December 2024

Pre-Application Consultation Report

Bishops Dal Battery Energy Storage System

Contents

1 Introduction

This Pre-Application Consultation (PAC) Report outlines how Bishops Dal Energy Storage Limited (the Applicant) has engaged with the local community to inform them about the proposed Bishops Dal Battery Energy Storage System, hereinafter referred to as the Proposed Development.

The Report explains how and when the community was consulted before the application for Section 36 (S36) through the Electricity Act 1989 was submitted to Scottish Government's Energy Consents Unit (hereinafter referred to as ECU) and how this consultation has shaped the Proposed Development.

The PAC Report summarises those activities undertaken, details how comments received from the community were considered and sets out if any consequent changes or mitigating measures have been included in the proposal.

Albeit not a statutory requirement for S36 applications, nevertheless the Applicant is committed to effective community engagement and has applied the principles of the consultation process recommended for 'major' planning applications as set out in The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (as amended by the Town and Country Planning (Pre-Application Consultation) (Scotland) Amendment Regulations 2021) and Planning Circular 3:2022-Development Management Procedures.

The approach taken by the Applicant is also consistent with the approach advocated by the ECU in their Good Practice Guidance for Applications Under Section 36 and 37 of the Electricity Act 1989. This enables the local community and all those with an interest in the proposals a clear opportunity to view the proposals, and importantly comment and feedback.

1.1 Proposed Development

The Applicant is developing a 150MW battery energy storage system near Eccles Substation. The Proposed Development will consist of battery storage enclosures, power conversion systems, transformers, electrical infrastructure, foundations, access track, crane hardstanding, and spares storage containers. The grid connection will be via an onsite 132kV substation.

2. The applicant's commitment to consultation

The Applicant is committed to finding effective and appropriate ways of engaging with all its stakeholders, including local residents and community organisations, and believes that the views of local people are an integral part of the development process. The Applicant is also committed to developing long term relationships with the communities around its projects, proactively seeking ways in which it can support and encourage community involvement in social and environmental projects near its developments.

3. Statutory requirements and best practice

The Applicant recognises the value of engaging with and seeking to involve the local people in development proposals, both prior to and following the submission of any application and through to the construction and operation should the Applicant's proposals obtain consent.

Whilst there is no statutory requirement for pre-application consultation in relation to Section 36 applications, the Applicant has undertaken pre-application consultation for the Proposed Development in accordance with

the minimum best practice activity expected as set out in the Electricity Act 1989 – Section 36: applications guidance (Section 3. Pre-Application)[1].

Planning Advice Note (PAN) 3/2010 – Community Engagement is an update of PAN 81 which advises that in order for the community engagement to be successful, it is important that everyone interested in the future development of the community, village, town, or city they live in, should understand the planning process. Developers are advised to involve residents at the earliest opportunity so that they can feel confident that engagement in the process has been meaningful:

PAN 3/2010 highlights that the term 'consultation' is used to mean the:

"Dynamic process of dialogue between individuals or groups based on a genuine exchange of views and, normally, with the objective of influencing decisions, policies or programmes of action. The terms 'engagement' and 'involvement' are generally interchangeable and are taken to mean the establishment of effective relationships with individuals or groups. Participation is everything that enables people to influence the decisions and get involved in the actions that affect their lives. In the context of this document, engagement is, in effect, giving people a genuine opportunity to have a say on a development plan or proposal which affects them; listening to what they say and reaching a decision in an open and transparent way to ensure they are taking account of all views expressed (page 3, paragraph 1)."

National Planning Framework 4 (NPF4) (2023) also highlights the important role of effective engagement, stating:

"Throughout the planning system, opportunities are available to engage in development planning and decisions about future development. Such engagement, undertaken in line with statutory requirements, should be early, collaborative, meaningful and proportionate. Support or concern expressed on matters material to planning must be given careful consideration in the determination of development proposals."

The Applicant is committed to undertaking effective and early consultation methods in this way, including tailoring its strategies to suit individual communities. Residents' values and issues of importance vary, and the consultation programmes are designed to reflect that.

4. Consultation methodology

The purpose of pre-application consultation is to improve, where possible, the quality of the proposed S36 application by considering public opinions and addressing, wherever possible, any issues raised by stakeholders. It is also intended that any interested stakeholders have access to up-to-date and accurate information regarding the Proposed Development and the opportunity to provide feedback to be considered prior to the proposed S36 application being finalised and submitted.

4.1 Community and stakeholder mapping

This section details the key local stakeholders that the Applicant identified and consulted with during the pre-application consultation process. Prior to the start of the consultation, the Applicant undertook desktop research to develop a comprehensive understanding of the key stakeholders to engage with during pre-application consultation. This research involved identifying local stakeholders located around the site of the Proposed Development.

[1] https://www.gov.scot/publications/good-practice-guidance-applications-under-sections-36-37-electricity-act-1989/pages/3/

The stakeholder groups identified included:

- Leitholm, Eccles and Birgham Community Council
- Ward members for the Mid Berwickshire Ward of Scottish Borders Council
- Member of Scottish Parliament for the Ettrick, Roxburgh and Berwickshire Scottish parliamentary constituency
- Member of Parliament for the Berwickshire, Roxburgh and Selkirk Westminster constituency
- Residential properties within 3km of the Proposed Development

4.2 Consultation

The pre-application consultation began on 4 July 2024. A combination of methods was used to inform the stakeholders about the Proposed Development and, subsequently, to ascertain their views.

In line with the guidance, any public notices included a statement advising that comments made to the prospective Applicant were not representations to the determining authority and that if the Applicant submitted an application there would then be an opportunity to make representations on the application to the determining authority at that stage.

4.2.1 Letter emailed to locally elected representatives – 4 July 2024

The Applicant wrote to Leitholm, Eccles and Birgham Community Council and ward members for the Mid Berwickshire Ward of Scottish Borders Council to advise them that the Applicant was investigating the potential for a battery energy storage development at the site location and would commence a number of consultation activities shortly - including holding public exhibitions to gather people's feedback on the proposal.

The letter also invited these representatives to contact the Applicant if they wished to arrange a meeting to discuss the proposal. A copy of the letter can be found at **Appendix A**.

4.2.2 Project website – 4 July 2024

A project website was launched at **www.bishopsdal-energystorage.co.uk** containing information on the Proposed Development as well as contact details for the project team to facilitate direct engagement.

The project website remains live and will be updated when the application is validated, to include links to all S36 application documentation.

4.2.3 Pre-exhibition advertising (first consultation) – 11 July 2024

The Applicant placed an advertisement which appeared in the Southern Reporter to help raise awareness of the upcoming public exhibition event (first consultation). A copy of the advertisement can be found at **Appendix B**.

4.2.4 Newsletter emailed to locally elected representatives – 11 July 2024

The Applicant emailed a copy of the newsletter, advertising the upcoming public exhibition event (first consultation), to Leitholm, Eccles and Birgham Community Council and ward members for the Mid Berwickshire Ward of Scottish Borders Council.

4.2.5 Community pre-exhibition newsletter mailing (first consultation) – 12 July 2024

The Applicant sent a newsletter, advertising the upcoming public exhibition event (first consultation), to 419 properties identified within 3km of the Proposed Development. A copy of the newsletter can be found at **Appendix C**.

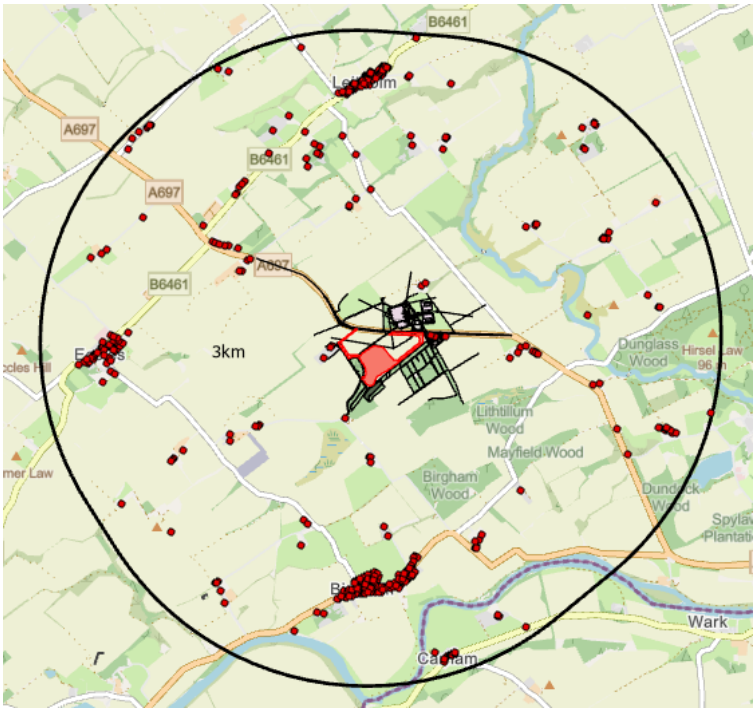


Figure 1- Community pre-exhibition newsletter mailing radius (3km)

4.2.6 Letter to political elected representatives – 22 July 2024

The Applicant sent letters to the MSP for the Ettrick, Roxburgh and Berwickshire Scottish parliamentary constituency and the MP for the Berwickshire, Roxburgh and Selkirk Westminster constituency to introduce the Proposed Development and provide further information on the upcoming public exhibition (first consultation). The letter also invited the representative to attend a meeting to discuss the proposal and the challenges and opportunities of the journey to net zero and decarbonisation. A copy of the letters can be found at **Appendix D**.

4.2.7 Meeting with members of Leitholm, Eccles and Birgham Community Council – 24 July 2024

The Applicant met with members of Leitholm, Eccles and Birgham Community Council to discuss the preliminary plans for the Proposed Development, answer any questions and listen to feedback. Presentation folders were provided to the community council members, a copy of which can be found at **Appendix E**.

4.2.8 Public exhibition (first consultation) – 24 July 2024

The public exhibition for the first consultation took place on 24 July 2024 between 3pm and 8pm at Birgham Village Hall, Birgham, Coldstream, TD12 4NG.

Figure 2 - Public exhibition (first consultation), Birgham Village Hall

Approximately 50 people attended the public exhibition, and a copy of the information boards presented at the public exhibition can be found at **Appendix F**.

All information provided on the information boards at the public exhibition was also published on the project website at **www.bishopsdal-energystorage.co.uk** from 24 July 2024.

For people without internet access, hard copies of the public exhibition material were made available upon request. No requests for hard copies were received.

The Applicant recognises that the public exhibition for the first consultation took place during the school holiday. The Applicant therefore also offered individual telephone or video appointments between 10am and 2pm, and 4pm and 8pm, on 30 July and 5 August 2024 for anyone wishing to discuss the proposal further or ask specific questions. One appointment was made for the individual telephone/video meetings on 30 July 2024.

A comment form was provided at the public exhibition as well as online, to encourage feedback from people about renewable energy and battery energy storage in general and the project design specifically. The comment form was made available as a hard copy to submit at the public exhibition as well as on the project website where it could be submitted online, by email or by post. A copy of the comment form can be found at **Appendix G**.

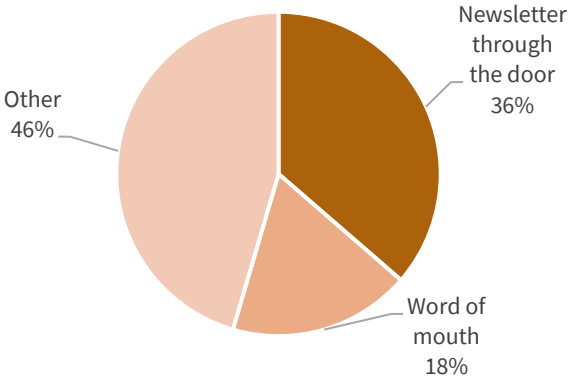
The consultation period for feedback on the proposal ran from 24 July 2024 to 9 August 2024. A total of 11 completed comment forms were received by the Applicant. Eight comment forms were completed and submitted during the public exhibition event, two comment forms were received via the online form and one comment form was received by post. A summary of the answers received to the closed questions on the comment form is provided in section 4.2.9.

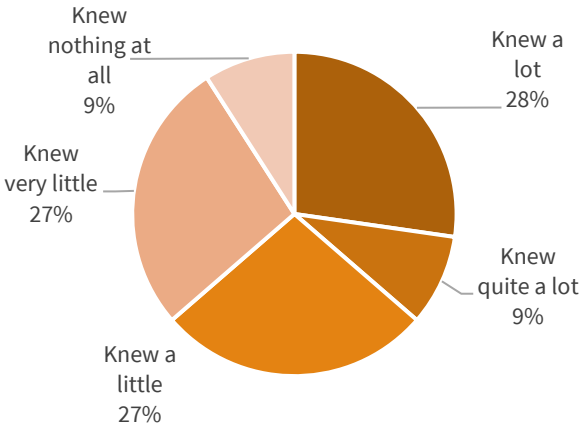
At all stages of the consultation process the Applicant set out clearly the purpose of the consultation and emphasised that comments made were not representations to the determining authority and that there would be the opportunity for representations to be made to the determining authority once the planning application was submitted.

4.2.9 Summary of responses to questions on submitted comment forms – 11 respondents (first consultation)

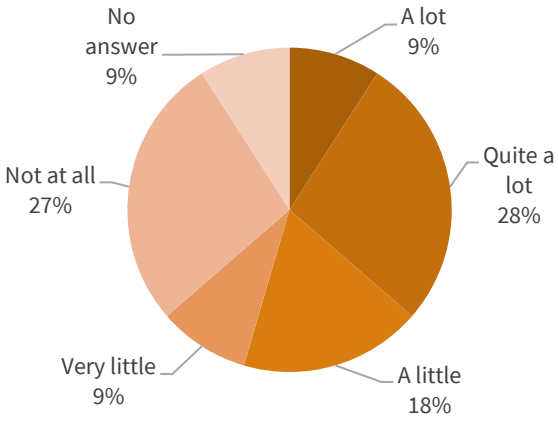
Q1.1 How did you find out about our public exhibition?

Q1.2 Before visiting the exhibition how would you describe your knowledge of the proposed Bishops Dal Battery Energy Storage System?

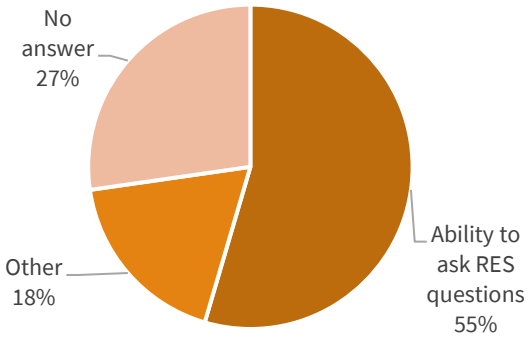




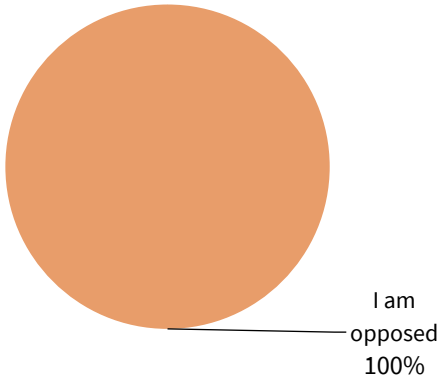
Q1.3 Having visited the exhibition, to what extent do you feel you have increased your understanding about the proposed Bishops Dal Battery Energy Storage System?



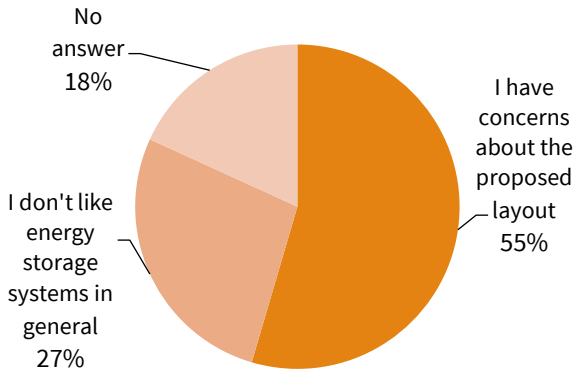
Q1.4 What part of the public exhibition did you find most useful?



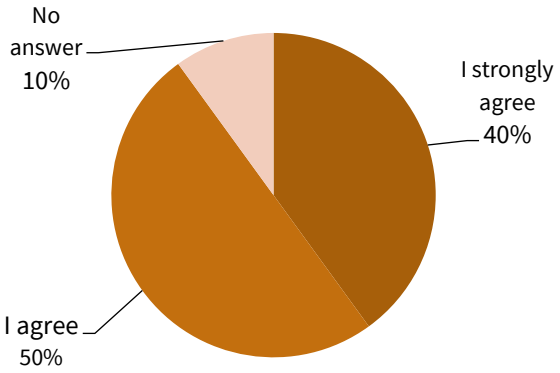
Q2.1 How do you feel in general about the Bishops Dal Battery Energy Storage System proposal?



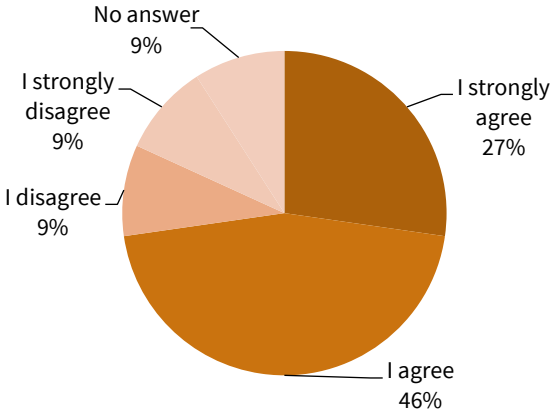
Q2.2 What do you think about the proposed preliminary design layout of Bishops Dal Battery Energy Storage System?



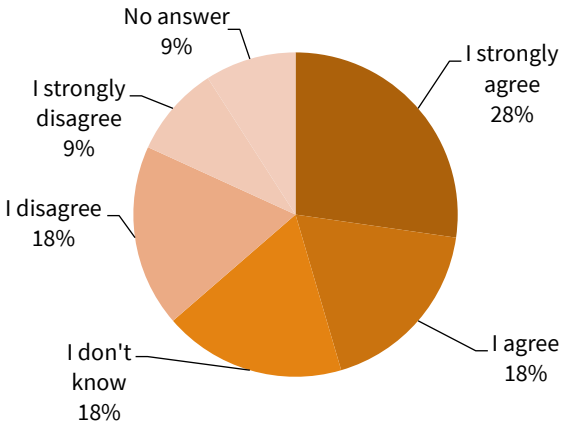
Q4.1 Do you agree that we are facing a global climate change emergency?



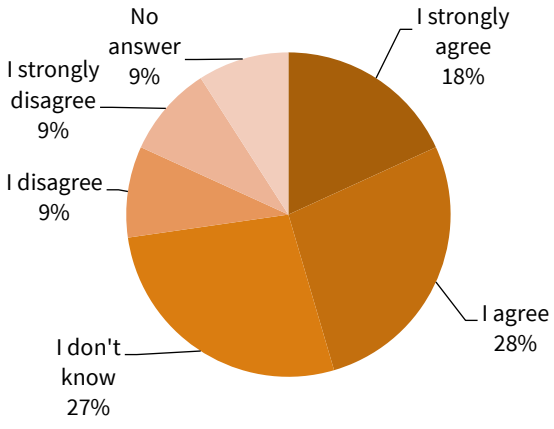
Q4.2 Do you agree that generating electricity from renewable sources, and reducing our reliance on fossil fuels, can help towards tackling the issue of climate change?



Q4.3. Do you agree that generating electricity from renewable sources will provide greater energy independence and security for Scotland?



Q4.4 Do you agree that we need to develop energy storage projects to create a more stable and secure electricity system, supporting the rollout of zero carbon energy?



4.2.10 Pre-exhibition advertising (second consultation) – 29 August 2024

The Applicant placed an advertisement which appeared in the Southern Reporter to help raise awareness of the upcoming public exhibition event (second consultation). A copy of the advertisement can be found at **Appendix H**.

4.2.11 Postcard emailed to locally elected representatives – 29 August 2024

The Applicant emailed a copy of the newsletter, advertising the upcoming public exhibition event (second consultation), to Leitholm, Eccles and Birgham Community Council, ward members for the Mid Berwickshire Ward of Scottish Borders Council, the MSP for the Ettrick, Roxburgh and Berwickshire Scottish parliamentary constituency and the MP for the Berwickshire, Roxburgh and Selkirk Westminster constituency.

4.2.12 Community pre-exhibition newsletter mailing (second consultation) – 29 August 2024

The Applicant sent a postcard, advertising the upcoming public exhibition event (second consultation), to 419 properties identified within 3km of the Proposed Development. A copy of the newsletter can be found at **Appendix I**.

4.2.13 Public exhibition (second consultation) – 11 September 2024

The public exhibition for the second consultation took place on 11 September 2024 between 3pm and 8pm at Leitholm Village Hall, Main Street, Leitholm, TD12 4JL.

Figure 3 - Public exhibition (second consultation), Leitholm Village Hall

Approximately 26 people attended the public exhibition, and a copy of the information boards presented at the public exhibition can be found at **Appendix J**.

Hard copies of a Report on Feedback were provided as part of the exhibition materials, which summarised the written feedback received from the community during the July 2024 public exhibition and subsequent consultation period. It also highlighted any changes that have been made to the preliminary design of the proposed development since then. A copy of the Report on Feedback can be found at **Appendix K**.

One comment form from the first consultation was received by post after the publication of the Report on Feedback, as such it was not included in the Report but is included in section 4.2.9 above.

All the information provided on the information boards at the second public exhibition and a digital copy of the Report on Feedback, was published on the project website at **www.bishopsdal-energystorage.co.uk** from 11 September 2024.

For people without internet access, hard copies of the public exhibition material were made available upon request. No requests for hard copies were received.

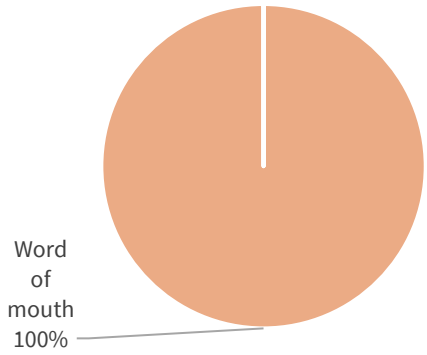
A comment form was provided at the public exhibition as well as online, to encourage feedback from people about renewable energy and battery energy storage in general and the updated project design specifically. The comment form was made available as a hard copy to submit at the public exhibition as well as on the project website where it could be submitted online, by email or by post. A copy of the comment form can be found at **Appendix L**.

The consultation period for feedback on the proposal ran from 11 September 2024 to 27 September 2024. A total of 1 completed comment forms were received by the Applicant. A summary of the answers received to the closed questions on the comment form is provided in section 4.2.14.

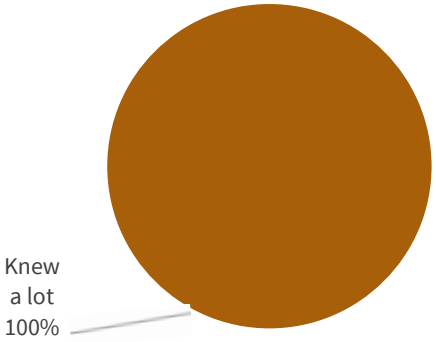
At all stages of the consultation process the Applicant set out clearly the purpose of the consultation and emphasised that comments made were not representations to the determining authority and that there would be the opportunity for representations to be made to the determining authority once the planning application was submitted.

4.2.14 Summary of responses to questions on submitted comment forms – 1 respondent (second consultation)

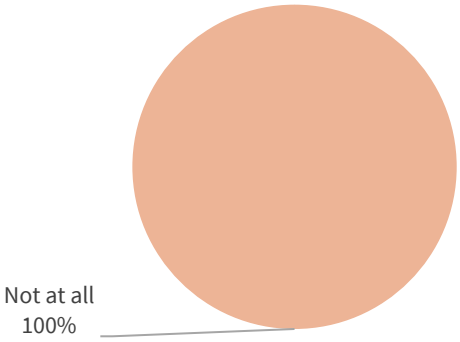
Q1.1 How did you find out about our public exhibition?



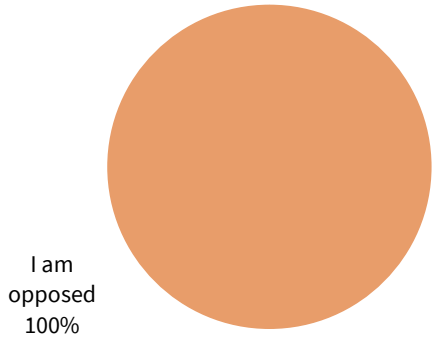
Q1.2 Before visiting the exhibition how would you describe your knowledge of the proposed Bishops Dal Battery Energy Storage System?



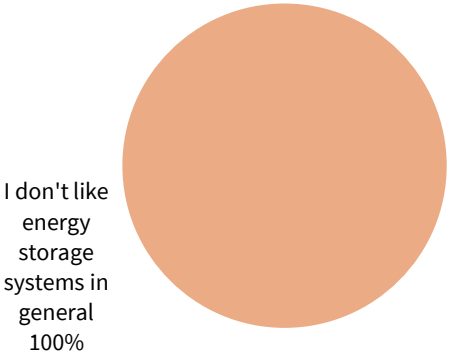
Q1.3 Having visited the exhibition, to what extent do you feel you have increased your understanding about the proposed Bishops Dal Battery Energy Storage System?



Q 2.1 How do you feel in general about the Bishops Dal Energy Storage System proposal?



Q2.2 What do you think about the proposed updated design layout of the Bishops Dal Energy Storage System?



4.2.15 Other consultation responses

In addition to the consultation activities outlined above, the Applicant responded to any queries received by email, in relation to the Proposed Development from the local community, stakeholders and statutory consultees throughout the pre-application period.

4.3 Summary of consultation

In summary, a range of engagement and communication activity was undertaken as part of the pre-application community consultation - reaching both local stakeholders as well as audiences in the wider area. This activity included:

- Letters to locally elected representatives;
- Letters to politically elected representatives
- Advertisements for the public exhibitions in the local press;
- Newsletters informing local residents and elected representatives about the public exhibitions;
- Two public exhibitions; and
- A dedicated project website.

All feedback received during the pre-application consultation period has been considered by the Applicant throughout the design iteration and pre-planning stages of the Proposed Development. A summary of feedback, issues and concerns raised, together with the Applicant's response to each can be found in section 5.

5. Feedback and applicant's response

The Applicant believes in meaningful and effective consultation, to facilitate constructive dialogue with stakeholders and the community. All feedback received through the pre-application consultation activities has been considered, as part of the iterative design process.

A summary of the feedback received from both the completed comment forms and any additional feedback received verbally, by email or post, are summarised below together with the Applicant's response.

Sample of comments received	**Applicant's response to issue/concern**
<u>Need for the development</u> *"We've had enough BESS projects coming into the area."* *"Green energy is fab - we're doing our bit. Where does it end!?"*	The way in which we use, and generate, electricity is changing. Our electricity system is in a transitionary period to manage the increasingly complex supply and demand needs of the 21st Century, and battery energy storage systems (BESS) provide an important role in this. BESS technology supports the variable generation of renewable energy technologies by playing an important balancing and grid stability role. BESS helps support National Grid by storing energy at times when generation exceeds demand and releasing electricity

	back to the national grid network when demand exceeds generation. BESS is considered the fastest technology for responding to a sudden spike in demand or an abrupt loss of supply. BESS can also provide grid stability (frequency of the grid) services on a second-by-second basis as well as providing additional network capacity, particularly at times of network stress. BESS is essential to enabling and accelerating the rollout of zero carbon energy. Increasing its installed capacity will be vital to support Scotland's net-zero emissions target and help to deliver a reliable, resilient, decarbonised electricity system for the future. In October 2024, BESS helped the energy system recover after the NSL interconnector, which connects the UK and Norway, suddenly stopped exporting power to the UK. Exported power dropped from 1.4GW to zero, with frequency on the network falling as low as 49.59Hz in two seconds—well below the operational limits of 49.8 – 50.2Hz. The energy system recovered within two minutes thanks to fast-acting frequency services, particularly BESS operations. BESS also has a key role in cost-effectively decarbonising the power sector by 2030. They help to balance the electricity system at a lower cost by maximising the output of variable generation as well as minimising both network upgrades and the need for new infrastructure. Short-duration flexibility offered by technologies such as BESS, could reduce energy system costs by up to £10bn per year by 2050[2] through minimising the need for new peaking generation, such as expensive gas, and network assets.
<u>Cumulative impact</u> *"Stop cluster development"* *"I have concerns about another energy storage system, we have enough in our area"* *"I am opposed to more storage systems in general however the proposed layout seems well considered"* *"We have agreed to 3 BESS sites in our area, and you don't seem to comprehend the 'non-proliferation' situation"* *"It is too much for one area."*	The Applicant understands and is mindful of concerns amongst the local community regarding the number of developments in the area. Due to the limited grid capacity across Scotland, it is common to see developments focus on areas where there is grid capacity. Potential cumulative impact from other operational, consented and in-planning developments has been carefully considered and assessed in the following reports which accompany the S36 application; • Landscape and Visual Appraisal • Acoustic Assessment

2 https://assets.publishing.service.gov.uk/media/60f57aade90e0764cd98a0a3/smart-systems-appendix-i-electricity-system-flexibility-modelling.pdf

"Green energy is fab - we're doing our bit. Where does it end!?"	• Construction Traffic Management Plan BESS needs to be able to both import and export energy and whilst the availability of sites with sufficient import and export capacity is extremely limited, the development is situated in an area with sufficient capacity. The Proposed Development has been specifically located adjacent to the existing Eccles electricity substation where the Proposed Development will connect to the wider grid network via an underground connection. BESS need to be located as close as possible to the substation from which its grid connection is provided in order to limit electrical losses and ensure efficiency of the system. By locating the Proposed Development here, there is also minimum requirement for additional overhead and/or underground cables to connect the Proposed Development to the grid network, therefore limiting any environmental impacts.
Location *"Brown field sites please!"* *"These types of storage facilities should be placed at or close to the generation such as in wind farms where the space is already available."* "*Despite the comments/objections you have not re-shaped the project to be re-site elsewhere on more suitable "brownfield" land"* *"At the last consultation you were advised to approach a nearby resident who would be willing to sell property/land as a brownfield option."*	The Proposed Development has been specifically located adjacent to the existing Eccles electricity substation where it will connect to the wider grid network via an underground connection. BESS need to be located as close as possible to the substation from which its grid connection is provided in order to limit electrical losses and ensure efficiency of the system. Like most BESS of this size, the Proposed Development would not be directly linked to an electricity generating station. The Proposed Development would be connected directly to the wider grid network and the frequency and timing of when the system charges and discharges is dictated by the status of the grid network. The Proposed Development will be utilised by National Grid to balance peaks and troughs in energy demand and generation. The Applicant considered the land formerly used as a sawmill, as advised, however, the available land was not of sufficient size for the project and was located too close to receptors.
Property values *"People can't sell up or move. House values have dropped"*	The Applicant has sought to develop a project which will sit sensitively within the landscape whilst minimising any potential impact on local residents.

"You openly declared that you have no responsibility towards compensating people who live close to the site. They are already traumatised by the local site already agreed and your site would just add to their pain and suffering. They will have no chance of ever selling their property so your 'so what' attitude seems to represent the general uncaring and undesirable stance of your company"	Feedback from the local community and stakeholders was considered throughout the iterative design process and a host of environmental and technical surveys and assessments, which accompany the S36 application have been undertaken. These assess the potential impacts of the Proposed Development and where any adverse impacts on local residents have been identified, appropriate mitigation measures are proposed. BESS is crucial in enabling the rollout of zero carbon energy and supporting Scotland's net-zero carbon emissions. BESS will also help create a more stable and secure electricity system for all. Property value is subjective and can be affected by a range of factors. At this time, there is no firm evidence on whether BESS do or do not affect house prices.
Use of agricultural land *"They should not be placed on agricultural land"* *"I am concerned about the use of prime agriculture land for energy storage"* *"This is not essential infrastructure and should not therefore be sited on prime agricultural land"* *"At the last consultation you were advised to "double up" with another developer to minimise overall landtake."*	The compound area containing the battery containers, substation and associated infrastructure, does not exceed 2.4 hectares and the Proposed Development has been specifically designed to minimise the amount of protected land which is required. Land take has also been minimised as much as possible so that the remaining areas of the field can continue to be farmed. The Applicant will always seek to develop on lower grade land. In the case of the Proposed Development there is specific locational need, close to Eccles substation. Development on prime agricultural land can also be supported where related to national scale energy projects, such as the Proposed Development, and where there will be secure provision for restoration which is the case for the Proposed Development. The Applicant recognises BESS technology is moving at pace, and this may result in more compact developments in the future. However, at this time developments need to be designed on the technology currently available.
Decommissioning *"You offered no solution towards returning the site to its original condition"*	The Applicant has proven experience in the decommissioning of BESS, returning the site to its original use in a safe and efficient manner. It is anticipated that the Proposed Development would be returned to its original use at the end of its life. Once all materials and components have been removed, topsoil which will be retained following construction,

	will be reseeded, according to the landowner's requirements. During the decommissioning and restoration of two recent BESS, the Applicant was able to achieve a 98% waste-free process and returned the sites to their original use. By demonstrating the feasibility of a nearly waste-free decommissioning process and meeting their goal of recycling 98% of all materials of the project, the Applicant hopes to set a precedent for sustainable practices in the industry. This aligns with the Applicant's commitment to environmental stewardship but also serves as a blueprint for future decommissioning projects, paving the way towards a more sustainable energy landscape.
Acoustics *"Give realistic assessment of the generated noise including the pulsating tonal effects from the combined effects of fans etc."*	An **Acoustic Assessment** accompanies the planning application and considers the Proposed Development as well as any potential cumulative impact from neighbouring sites. The results of the Acoustic Assessment show that the predicted external noise levels resulting from the introduction of the Proposed Development in isolation, at the nearest neighbouring properties, remain below the derived noise level limits for all receptors and can be considered acceptable in terms of the condition provided by Scottish Borders Council. A cumulative assessment considered the cumulative predicted noise levels from the Proposed Development and the three neighbouring sites in planning. It was concluded that the Proposed Development could be considered insignificant in terms of its cumulative contribution and would not be a significant contributor to the predicted cumulative levels. A 3 m high acoustic fence surrounding the battery storage facilities has been included within the assessment
Pollution *"What happens to contaminated water run-off in the event of a fire?"* *"Will the land be contaminated by the development?"*	To minimise any potential pollution risk related to the construction activities of the Proposed Development a **Construction Environmental Management Plan (CEMP)** has been developed and forms part of the planning application. The CEMP includes how noise, vibration, dust and other airborne pollutants, smoke and odour from construction work will be controlled and mitigated. The CEMP also

	sets out monitoring, recording and reporting requirements. A detailed battery safety management plan will be developed in conjunction with the Fire and Rescue Service. If the agreed strategy includes use of water to directly cool a battery fire, the drainage system would be suitably detailed to allow management of potentially contaminated run off. This would be achieved by lining the drainage network and attenuation pond with impermeable materials and by inclusion of a cut-off valve on the pond outfall. In the unlikely event of a fire, and if water were needed to cool equipment, the outfall cut-off valve would be closed, enabling fire water to be safely captured and preventing any contaminate from leaching or transferring to soils. The captured fire water would then be tested and disposed of offsite as necessary in the appropriate manner.
<u>Flood risk and surface water management</u> *"The area is prone to flooding"* *"The development could impact on the River Tweed"*	A **Flood Risk Assessment and Surface Water Management Plan** accompanies the planning application. The Proposed Development has been designed in accordance with SuDS manual hierarchy to avoid flooding in the area with water discharge flows limited to the pre-development discharge flows. Infiltration testing within the site boundary has been conducted to assess the soil's infiltration capacity and the results demonstrate that the soil's infiltration capacity is poor. Compliance with pre-development discharge flows will be achieved by collecting surface water flows in a series of filter drains before discharging into an above ground attenuation basin which has been sized to allow for a 1 in 200-year storm plus an allowance for climate change. Flows discharging out of the attenuation basin will be restricted by means of a flow control device, and restricted flows will discharge to the existing field drain, as per the pre-development hydrological regime.
<u>Fire safety</u> *"There is only one fire appliance for the area, and it is not a retained station"* *"My concern is for the safety of local residents. Having discussed this with your team, it seems that little work has been*	For the Applicant, safety is of the utmost importance. The Proposed Development has been developed to address and mitigate against the risk of fire ignition and propagation, in a number of ways. The proposed battery technology for the Proposed Development is anticipated to be lithium iron phosphate (LFP). LFP has better stability against thermal runaway

conducted on fire safety and health and safety issues."	at higher temperatures compared to some other battery chemistries. Batteries will be specified to be tested and certified to UL 9540A, demonstrating resistance to thermal runaway. A number of control measures will also be implemented to further reduce risk from fire. These include: • Equipment spacing – the design allows for adequate spacing between the battery storage enclosures to mitigate against the risk of fire spread. • Protection systems - comprising flammable gas detection and venting, fire detection and alarm, and an automatic fire suppression system. • Access to battery enclosure – all battery enclosures will be accessed via external doors only. • Access for emergency services – the design incorporates wide access routes around the perimeter as well as through the corridors running northeast to southwest of the fenced compound, allowing the fire service to access the Proposed Development in the unlikely event of an incident. In addition, two access points are proposed to the compound from the highway. • Emergency Response Plan - taking into account remote services in the area. An **Outline Battery Safety Management Plan** accompanies the planning application. If consented, a full Battery Safety Management Plan will be developed in liaison with all relevant parties including the local fire and rescue services.
<u>Consultation and exhibitions</u> *"Could you clarify what you mean by post cards to local area please? How many properties, which postcodes, do you have a distribution map to share?"* *"I presume you have a wider comms plan to alert folk to the event with local press, emails to other Berwickshire Community Councils etc?"*	Whilst there is no statutory requirement for pre-application consultation in relation to Section 36 applications, the Applicant has undertaken pre-application consultation for the Proposed Development beyond the minimum best practice activity expected as set out in the Electricity Act 1989. To promote the two consultation events, invitations were sent to 418 properties within 3km of the Proposed Development, as shown in figure 1 and advertisements were placed in the Southern Reporter. In addition, Leitholm, Eccles and Birgham Community Council, ward members for the Mid Berwickshire Ward of Scottish

"Map of ALL 6 proposed sites for battery storage [required]" *"Have true pictural representation of how it will look"* *"Ensure that all staff are ready/willing to point out other BESS sites. I was shown all but the adjacent site!"* *"No comment other than an attempt has been made to "polish the turd" (apologies for being crude, but that is how I view this development)."*	Borders Council, the MSP for the Ettrick, Roxburgh and Berwickshire Scottish parliamentary constituency and the MP for the Berwickshire, Roxburgh and Selkirk Westminster constituency were kept updated by the Applicant. The project website was also updated accordingly. The Applicant carefully considered the feedback received from the first consultation event and sought to respond to and address it as the design was refined, and within the materials presented at the second consultation event. As part of the second consultation event, the Applicant produced a comprehensive Report on Feedback (**Appendix K**) which summarised the feedback received from the first consultation and how they had responded to it. The Applicant acknowledges that some of the illustrative imagery used on the exhibition material at the first consultation was not wholly representative of the Proposed Development. The Applicant endeavoured to use illustrative imagery which better reflected the Proposed Development in materials for the second consultation. In response to comments on the need for pictural representation, the Applicant included a Zone of Theoretical Visibility and photomontages from three viewpoints as part of the exhibition materials for the second consultation. The Applicant also included a plan showing all consented and proposed developments in the area, as discussed with a number of visitors at the first consultation.

6. Summary

The Applicant believes that consultation and effective communication is extremely important when developing a battery energy storage project.

The Applicant has engaged proactively on the proposal in order to facilitate an early and constructive consultation process and used a variety of methods to communicate and engage with the local community, stakeholders and other interested parties in order to facilitate a strong public understanding of the potential impacts and benefits of the Proposed Development.

This PAC Report sets out the consultation in respect of a the S36 application for the Proposed Development. It confirms that pre-application consultation has been undertaken in accordance with expected and good

practice standards and shows that the Applicant engaged early with the local community to encourage a constructive consultation process.

The Applicant has considered feedback received during the consultation periods and, along with the results of site surveys and assessments, fed this into the iterative design process for the Proposed Development, wherever possible. An example of taking on board feedback included minimising land take as much as possible so that the remaining areas of the field can continue to be farmed and ensuring topsoil removed as part of the construction works is retained. The topsoil would be used for the earth bunds which form part of the Applicant's landscaping proposal. Retaining the topsoil will reduce traffic movements and support the site's restoration at the end of its life.

The Applicant also carefully considered both written and verbal feedback from the first consultation when planning materials to be presented at the second consultation. This ensured as much information as was available at the time was provided to the community, and was meaningful and proportionate.

The Applicant is committed to continuing the open dialogue it has established with the local community during pre-application community consultation and as the planning process continues.

The Proposed Development's website at **www.bishopsdal-energystorage.co.uk** has been and will continue to be updated regularly to enable people to keep up to date with the latest news about the Proposed Development as it progresses. Once the application has been validated by the ECU, the Applicant will write to stakeholders and members of the community who have asked to be kept updated on the Proposed Development, to provide them with the planning reference number and contact details for the ECU, should they wish to submit a formal representation.