*Cut and paste the text below into an email and send this to:*

[*representations@gov.scot*](mailto:representations@gov.scot) *and* [*Representations\_Mailbox@gov.scot*](mailto:Representations_Mailbox@gov.scot)

*Please feel free to add your own opening or closing statement.*

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**Subject line: ECU00006121 Rothienorman 500MW Blackford Renewables Ltd.**

Dear Sir/Madam

Please find this email as an objection to the proposal for a 500MW battery energy storage system (BESS) at Middleton of Blackford, Rothienorman, AB51 8YN, ref: ECU00006121

Including this proposal, there are now six BESS sites in proposal to be constructed in this localised area, without any overview of the cumulative effects of these projects. There has been no Environmental Impact Assessment carried out, despite Aberdeenshire Council recommending that this be done, due to the cumulative effects.

My main points of objection are:

1. Landscape and Visual Impact: This site is 16.3Ha (equivalent to 23 football fields) and has a 25m drop across it – it is steeply sloped – the developers propose 6 terraces to deal with the height difference. There will be 470 20-foot shipping containers (332 battery containers and 138 power converters), 4608 Solar PV Panels and three 12m tall Super Grid Transformers, plus other associated equipment. Despite the 4m high fences and 8m high earth bunds proposed – this scale of equipment will be highly visible on the sloping site.
2. Noise: The noise report submitted by the developers is missing significant amounts of detailed information on sound sources, site layout, and receptors. The proposal is likely to increase background noise levels by 3 times the current levels. Two noise experts have reviewed this and advise that whilst it may be possible to make changes to the design of the site to make the sound emissions acceptable, this currently seems unlikely. The sloping nature of the site will make it very difficult to stop noise pollution escaping from the site, both during the construction and operation. The lack of detail regarding the specific equipment and the lack of comprehensive assessment for the cumulative impact means that it is more likely that the noise level would have a significant adverse impact on the locality.
3. Fire: It is not possible to extinguish a lithium-ion battery fire. Scottish Fire & Rescue have not been consulted on the plans for this site. The developer has not followed all of the National Fire Chiefs Council guidance for BESS sites. An emergency response plan is required for the site and for the area as a whole – including evacuation of residential properties and livestock, currently some residents would have to drive towards the site as their only evacuation route.
4. Water source, for fire containment: Huge volumes of water are required to be stored on site for potential fire suppression. Where will this water be sourced? Will it be trucked in? (adding to the construction traffic). What chemicals will be used to prevent stagnation and freezing?
5. Drainage, Private Water Supply, Fire water run-off and containment: The terracing of the slope and introduction of an impermeable membrane have not been properly modelled with respect to drainage, infiltration from SuDS to the environment, potential impact on private water supplies in terms of contamination and volume and potential pollution of river courses. There simply has not been sufficient, peer reviewed work undertaken on the impact of this project on groundwater.
6. Infrastructure: During construction, there will be major disruption on single track roads from both the 100+ construction workers arriving and leaving each day, along with the heavy goods vehicle deliveries for all of the concrete and the equipment. The table of vehicle movements provided within their CMTP document only accounts for a very limited amount of required traffic that would need to access the site.

The welfare units; the solar panels and related housing; the water tanks; the impermeable layer; the removal of waste from the 100+ workers; the water required on site; the fencing panels both palisade

deer fencing and acoustic fencing; the landscaping to be planted; all of these vehicle movements have not been accounted for in the planning document.

1. Biodiversity: As there has been no Environmental Impact Assessment carried out, then there is no proper oversight into the effect on habitats for the known badgers and bats in the adjoining designated Ancient Woodland, or for the other protected species such as the ground nesting birds. Disruption from construction, huge groundworks and 100’s of meters of 4m high fencing are going to impact the wildlife. If there is a fire, then the contamination of local habitat, and the contamination of water flowing into the Black Burn and into the Ythan will have a significant effect.
2. Rehabilitation: Where are the guarantees that the land will be restored at the end of the 25-years of the project – for example, how is the impermeable membrane and the concrete going to be removed from the ground? What are the plans to demolish the 8m high berm that has been planted with the by then mature shrubs and trees?
3. Community Wealth: The 'Community Wealth Building Plan' gives absolutely no commitment to the use of local workforce and offers zero community benefit. The document says that there are opportunities for local companies, but does not set out any obligation that they will give preference to local companies.

The Scottish Governments “Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments” document promotes community benefits of the value equivalent to £5,000 per installed megawatt per annum, index linked for the operational lifetime of the project. £5000 x 500 would equate to £2.5million annually to the community – this has been ignored by the developer.

National Planning Framework 4 Policy 11 encourages renewable energy projects, but only where the landscape and visual impact is minimised and where there are local and community benefits – this site will have a significant visual impact on the landscape, and there is no commitment for local opportunities, or community benefit. The proposed project does not meet the policy requirement, and therefore should be rejected.

Yours sincerely

Your Name (IN CAPITAL LETTERS)

Your Address

Street

Town

Postcode