Points of Objection

Building a Battery Energy Storage System (BESS) next to a Site of Special Scientific Interest (SSSI) requires the careful consideration of several factors. SSSIs are designated to protect areas of significant ecological or geological importance, and any development nearby could potentially impact the local environment.

Key points to consider:

1. Environmental Impact Assessment (EIA): Conducting a thorough EIA is essential to evaluate the potential effects of the BESS on the SSSI. This includes but is not limited to, impacts on local wildlife, habitats, and ecosystems
2. Regulatory Compliance: Ensuring compliance with local and national regulations regarding developments near protected areas. Obtaining necessary permits and conducting consultations with environmental agencies will need to be considered.
3. Mitigation Measures: Should the BESS be deemed necessary, implementing mitigation measures to minimize any adverse effects on the SSSI is crucial such as, habitat restoration, monitoring programs or any other protective strategies required

In summary, while the possibility of building a BESS near an SSSI is understood, it is imperative to conduct thorough assessments and engage in responsible planning to protect the ecological integrity of the area.

1. EIA

The EIA Screening Opinion Response issued by ASC on July 8, 2024 (ref: ENQ/2024/0934). The response stated that an Environmental Impact Assessment (EIA) would not be necessary for the proposed development. However, considering the close proximity of the site to the Site of Special Scientific Interest (SSSI) Wartle Moss, I am deeply concerned that an EIA is not included in the planning application process. The lack of a comprehensive environmental assessment raises serious concerns regarding the potential negative impacts on the local ecosystem and biodiversity.

The EIA Screening Opinion Response document highlights several points that must be taken into account in the planning application –

Section 1 (b) – "There are not other consented Battery Energy Storage Systems in close proximity".

- There are currently other 5 sites, totalling over 750MW within 5km radius of the Rothienorman Substation. These are approved/in construction and in pre application status. These applications should be considered as a cumulative due to the industrialised nature on the village of Rothienorman and homesteads and residential housing.

Section 1 (c) – "There are no statutory designated sites for nature conservation of international importance (SAC, SPA, Ramsar) within a 15km buffer. Wartle Moss which is a site of specific scientific interest (SSSI), is locate 500 metres to the east of the proposed site. The area is designated for its basin fen habitat, which is one of the largest and least disturbed in northeast Scotland. Mitigation will be required to contain surface runoff through creation of attenuation features

- Surface runoff must be contained via attenuation features, this should be suitable for any contaminates or spillages on site. This design requires approval that burn south of the site is suitable for discharge. This should be agreed and have appropriate approval & licencing, currently this is listed as only a possible solution for developer and full design analysis has not taken place.

Section 1 (f) – "In case of thermal runaway, the proposal will be designed in line with the BESS guidance from National Fire Chiefs Council. The proposal will incorporate 2 separate access points to the battery infrastructure and an access network No capable of accommodating any vehicle without obstruction. Spacing of BESS containers will be approximately 6m subject to confirmation of final design. A sufficient water supply will also be provided within the proposed design."

- Only one access point to the site is provided, with road width of 4m. If access point is blocked from A920 road there is no secondary access point considered.

2. Water – SuDs & Drainage

The Public Consultation Boards at event 3 (Appendix X of PRE APPLICATION CONSULTATION REPORT-11556654) does not show any SuDs/attenuation pond.

SITE_PLAN-11586460 – Outfall from SuDS pond is identified South of the site.

The developers have designated this location as a suitable discharge point; however, the FLOOD_RISK_AND_DRAINAGE_STATEMENT-11556666 indicates that further investigation is required to determine if it can be utilized as an outfall. Consequently, there may be no established discharge rate or licensing agreements in place. It is essential that these agreements are finalized to ensure a controlled release that protects the existing local drainage system. Given the site's proximity to the SSSI Wartle Moss, it is crucial that these matters are resolved prior to granting planning consent to allow for thorough analysis.

3. Road Access/Transport

- To access the proposed development, a newly constructed access junction is required along the A920. However, no detailed images or specifications have been provided for this entrance, which will need to be built over the existing burn running alongside the A920.
- There is no detailed construction plan for visibility along the A920; only top-level drawings and bird's-eye views are available for the location. A comprehensive construction plan for the road connection is expected.
- The creation of this entrance will necessitate the felling of eleven trees, which will increase the visual impact to the south of the site and for users of the A920.
- If access point is blocked from A920 road there is no secondary access point considered.
- The transport report indicates that data was collected over a 7-day period in November 2024, revealing an average daily flow of 2,244 vehicles. During peak construction, the site is expected to generate an additional 52 vehicle trips per day. It is important to note that the survey was conducted at the end of November to December 2024, a time when icy and wintry conditions likely reduced traffic flow; this road tends to be busier during the summer months.

- Personal Injury Accident data from 2019 to 2023 indicates that three accidents have occurred, two of which involved heavy goods vehicles (HGVs). This development is projected to result in 34 HGV visits per day at the peak of construction.

4. No grid connection plan

The site is situated 5 km from the Rothienorman Substation. However, this planning application does not specify how the site will be connected to the grid. This lack of clarity may lead to the installation of 5 km of overhead cabling at a later stage, and currently, there are no wayleave agreements in place with the surrounding landowners. Given the scale of this development, it is essential that this issue is addressed as a key consideration in the construction planning process.

5. Tree Felling

Document - TREE_SURVEY-11556676:-

The total quantity of trees to clear area for the access road or for site visibility cannot be determined from the document TREE_SURVEY-11556676. The conflicting information which trees should be felled from the 'Trees to be felled" section and the Appendix A where the detail of each tree is given.

States tree 43 is to be felled, however in Appendix A this tree is shown to be retained.

Tree 50 is shown in Appendix A to be retained however is listed below to be felled.

Trees to be felled

The following trees will be felled for the proposed access road:

43	Beech	44	Beech	46	Beech	47	Beech
48	Scots Pine	49	Beech	50	Beech	52	Scots Pine
58	Beech	60	Beech	Group A (part)			

The following trees will be felled for woodland management or health and safety:

2	Beech	45	Beech	85	Beech	92	Beech
97	Beech	100	Scots Pine				

The tree schedule with details of each tree is given in Appendix A

		1.5m (cm)	N	S	E	W	(m)	(m)				
30	Scots Pine	36, 46, 26	5	7	3	5	12	7.5	M	B	Three stems from 1.5m.	Retain
31	Scots Pine	75	5	7	4	4	11	9.0	M	B	Multi-stemmed from 1.6. South limb dominant.	Lift south canopy within visibility splay
32	Beech	36, 46, 22	8	5	3	4	12	7.2	M	B	Three stems from 1m. Wound at base. Sapling to southeast within visibility splay.	Remove stem within visibility splay.
33	Beech	41	7	6	4	4	14	4.9	M	B	Canopy at height with rookery.	Retain
34	Beech	39	6	7	6	3	13	4.7	M	B	Canopy at height with rookery.	Retain
35	Beech	60	9	3	5	5	13	7.2	M	B	Twin-stemmed from 3m. Canopy at height. Basal stem to south.	Remove basal stem to south.
36	Beech	52	7	5	3	3	13	6.2	M	B	Lower limbs within visibility splay.	Remove limbs within visibility splay
37	Beech	52	6	5	5	2	14	6.2	M	B	Suppressed by neighbouring trees west.	Retain
38	Beech	56	3	5	6	5	12	6.7	M	B	Sapling to south within visibility splay.	Remove sapling to south.
39	Beech	58	7	5	3	4	12	7.0	M	B	Deadwood in crown.	Remove south branches within visibility splay
40	Beech	46	6	7	5	5	12	5.5	M	B	Twin-stemmed from 3.5m.	Remove south branches within visibility splay
41	Beech	62	7	7	4	4	12	7.4	M	C	Twin-stemmed from 3m. Wounds apparent.	Retain
42	Beech	59	7	7	5	4	10	7.1	M	B	Multi-stemmed from 4m.	Remove south branch at 2.5m
43	Beech	82	6	7	4	5	13	9.8	M	B	Tree appears healthy.	Retain
44	Beech	65	3	8	5	4	12	7.8	M	B	Wound to south at base	Fell for development

No	Species	Dia at 1.5m (cm)	Canopy Radius (m)				Height (m)	RPA (m)	Age	Class	Description	Action
			N	S	E	W						
45	Beech	69	4	6	4	4	12	8.3	M	U	Limb removed at 5m to east. Bark damage in main stem.	Fell for health and safety.
46	Beech	41	5	4	4	3	9	4.9	M	C	North limb dead at 7m. Remainder of tree appears healthy.	Fell for development
47	Beech	50	5	5	4	6	11	6.0	M	B	Tree appears healthy.	Fell for development
48	Scots Pine	53	5	5	5	5	16	6.4	M	A	Canopy at height.	Fell for development
49	Beech	42	3	5	3	3	10	5.0	M	C	Deadwood and snags apparent. Tree appears healthy.	Fell for development
50	Beech	69	6	5	5	3	12	8.3	M	C	Wound to south from 2m to 4m, branch ripped off, no rot.	Retain
51	Beech	34	1	3	2	2	9	4.1	M	C	Suppressed by neighbouring trees. Slight lean south. Tree appears healthy.	Retain
52	Scots Pine	52	1	5	3	3	14	6.2	M	B	Tree appears healthy.	Fell for visibility
53	Beech	60	8	4	4	4	11	7.2	M	B	Tree appears healthy.	Retain
54	Beech	68	7	4	4	2	13	8.2	M	B	Suppressed by neighbouring trees west. Fallen branch from tree opposite burn to east.	Remove dead limb to south at 1.8m
55	Beech	43	6	5	4	3	13	5.2	M	B	Tree appears healthy.	Retain
56	Beech	45	2	5	3	2	11	5.4	M	B	Twin-stemmed from 3m. Slight lean south. Tree appears healthy.	Retain
57	Beech	50	6	5	5	4	13	6.0	M	B	Slight lean north. Tree appears healthy.	Retain
58	Beech	52	4	6	5	6	12	6.2	M	B	Twin-stemmed from 2.5m. within visibility splay	Fell for visibility
59	Scots Pine	47	4	3	4	4	10	5.6	M	C	Substantial deadwood and snags. Canopy mainly to north.	Retain
60	Beech	73	7	7	5	5	14	8.8	M	A	Wide spreading canopy. Tree is within visibility splay	Fell for visibility

6. Noise

- No acoustic sound panelling is provided within the planning application; no additional measures are taken to reduce the noise from the site.
- Noise impact assessment models the site with “Sungrow MVS5140-LS” and “PowerTitan 2.0” in calculations. There is no confirmation this is the equipment the site deloper will use.

7. Fire / Fire Safety

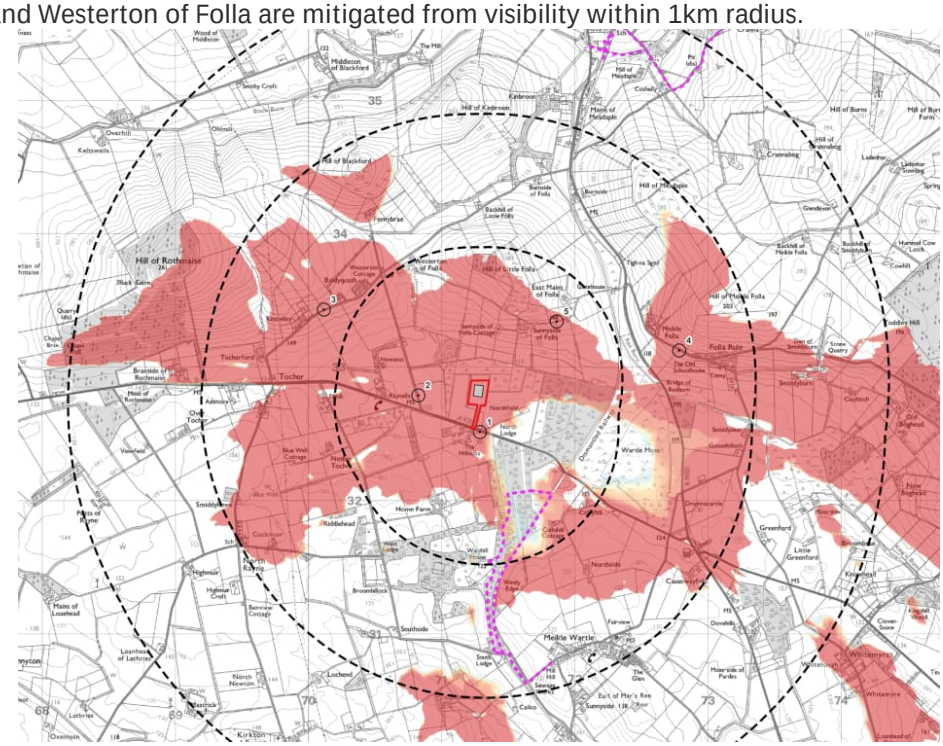
The risks of fire associated with a Battery Energy Storage System (BESS) located near a Site of Special Scientific Interest (SSSI) include:

- Fire Spread: In the event of a fire, there is a risk that flames could spread to the nearby SSSI, potentially damaging sensitive habitats and wildlife.
- Toxic Emissions: Fires involving batteries can release toxic gases and particulates, which could adversely affect air quality and harm any living organisms within the SSSI.
- Thermal Runaway: Lithium-ion batteries, commonly used in BESS, can experience thermal runaway, leading to overheating and potential fires. If a fire occurs, it may be difficult to control, especially if it spreads to surrounding vegetation.
- Environmental Contamination: Fire suppression efforts may involve the use of chemicals that could contaminate soil and water sources in the SSSI, impacting local ecosystems.
- Increased Fire Risk: The presence of electrical equipment and batteries can increase the overall fire risk in the area, particularly in dry conditions or during periods of high temperatures.
- Impact on Emergency Response: If a fire occurs, the proximity to the SSSI may complicate emergency response efforts, making it more challenging to contain the fire and protect both the BESS and the surrounding environment.

While the site is planned to store water for emergency fire response, the planning application does not include risk assessment or consultation from emergency services. Additionally, conducting a thorough risk assessment and engaging with fire safety experts can help ensure that potential hazards are adequately addressed.

8. View Points/Affected Area

- View Point 1 is incorrect as it mitigates the tree removal along the A920. The removal of the trees will increase the visibility of the site.
- Site Boundary Fencing – While the site equipment is protected by fencing, there is no fencing around the screening planting. This will be open to farm animals using the remainder of the field. This leads to damage of the plantation of mixed species hedge & woodland edge planting be protected. If this is damaged, it increases the residents view of the site.
- Drawing: - BARE_EARTH_ZONE_OF_THEORETICAL_VISIBILITY-11556671
  Below shows range of residents affected. Only castle, and home farm estate, Easy Mains of Folla and Westerton of Folla are mitigated from visibility within 1km radius.



9. Decommissioning

Section 1 (c) of EIA screening document - "BESS schemes can be easily decommissioned and land restored to its previous use. This will be confirmed through a decommissioning strategy."

- No decommissioning strategy is included within planning application.

- All structures should be temporary for the 40 year life cycle.

- Site images of DNO Control room show structure to be made of red brick material sitting on solid base. No information is given on the material of the base, are foundations required for this structure? Customer switch room also appears to be sitting on grey foundation block with no details of material.

- Use of materials such as concrete should be minimal and avoided. To remove ambiguity this material should be listed within the application as a consideration to how it will be decommissioned and returned to original condition after 40 years. During consultations no foundations were shown in planned views of the site.