



Pre-Application Consultation Report

Drum Farm Energy Storage Facility

Ref 04872-3888320

Revision History

Issue	Date	Name	Latest changes
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Contents

1	Introduction	3
1.1	RES' Commitment to Consultation	3
1.2	PAC Requirements and Guidance	3
2	Consultation	5
2.1	Key Stakeholders	5
2.2	Publicity	5
2.2.1	Introduction to the Development	5
2.2.2	Proposal of Application Notice (PAN)	5
2.2.3	Publicity for the Public Exhibition	6
2.2.4	Online Public Exhibition	6
2.2.5	Closing the Consultation	7
2.2.6	Final Consultation	7
3	Consultation Responses	8
4	Conclusion	9
Appendix A	- Online Exhibition Advert	10
Appendix B	- Newspaper Advert for Online Exhibition	11
Appendix C	- Online Exhibition Material Samples	12
Appendix D	- Online Exhibition Follow-Up Poster	14

1 Introduction

This Pre-Application Consultation (PAC) Report is submitted in support of a full planning application made by Renewable Energy Systems Ltd (RES) for the Drum Farm Energy Storage Facility near Keith. The proposed development comprises the installation of an energy storage facility, including battery enclosures, power conversion units, transformers, substations, grid connection infrastructure, vehicular access and associated works.

The proposed development constitutes a ‘Major Development’ as the proposed capacity is, or exceeds, 20 megawatts. This requires the applicant to carry out Pre-Application Consultation (PAC) with the local community and submit a PAC report with the planning application. This document fulfils this requirement. As a prerequisite, an applicant must provide a Proposal of Application Notice (PAN) setting out how it intends to carry out consultation and engage with the community local to its proposed development. RES submitted a PAN to Moray Council on 4th November 2021 and received confirmation that this satisfied the relevant requirements on 16th November 2021. This document details and reports on the consultation process undertaken by the RES for the proposed development.

1.1 RES’ Commitment to Consultation

RES is committed to finding effective and appropriate ways of consulting 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. We want to be good neighbours to the communities that host our renewable energy projects and will listen to and address questions or concerns that interested parties might have. A comprehensive process that engages with local people and stakeholders at an early stage allows an informed debate that helps us identify issues of potential concern, explore solutions, and design a project that will be welcomed as a positive asset by the local community.

1.2 PAC Requirements and Guidance

The requirement for PAC to be undertaken is contained in sections 35A, 35B and 35C of the *Town and Country Planning (Scotland) Act 1997*, as amended. The detailed requirements are set out in the *Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013*. The basic PAC requirements are currently that the prospective applicant must:

- Serve a proposal of application notice (PAN) on the planning authority describing the proposal and location and indicating what consultation they intend carrying out as part of PAC.
- Consult the community councils in whose area the proposal site is located or whose area adjoins the proposal site.
- Hold a public event.
- Publish a notice in a local newspaper indicating: where information on the proposal can be obtained; how to make views known to the prospective applicant; and the details of the public event (the notice must be published at least 7 days prior to the public event).
- Carry out any further PAC measures required by the planning authority (the authority has 21 days from the receipt of the PAN to make such requirements).

The purpose of Pre-Application Consultation (PAC) as set out in *Circular 3/2013 (Development Management Procedures)* between prospective applicants and communities is to:

‘Ensure communities can be better informed about major and national development proposals and to have an opportunity to contribute their views before a formal planning application is submitted to the planning authority. This helps to improve the quality of planning applications; mitigate negative impacts where possible; address misunderstandings; and to air and to address where practicable, any community issues. Any adjustments made as a result of PAC should improve the proposals and assist the efficient consideration of applications once submitted.’

For this particular application, the COVID-19 emergency means that, during the period of Pre-Application Consultation, it has not been possible to hold public meetings without unacceptably posing a significant risk to public health. So that the development management system can continue to function and so that planning applications can continue to be submitted, the *Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020* has been put in place to temporarily suspend the requirement for a public event in relation to PAC during the emergency period.

No statutorily specified alternative to a public event during the emergency period has been provided, but prospective applicants must propose reasonable alternatives based on the information in the Scottish Government document *‘Coronavirus (COVID-19): planning guidance on pre-application consultations for public events’*. The guidance makes clear that there is a requirement for an alternative to a public event as well as the requirement to make information available for a longer period and while both are likely to be online, a distinction between the two should remain. There should be a period of at least 7 days where the public can submit questions and comments to which an applicant will respond. A one-off live event of 2-3 hours is suggested as appropriate within this emergency period.

2 Consultation

2.1 Key Stakeholders

Prior to the start of the consultation, RES undertook detailed desk research to develop a comprehensive understanding of the key stakeholders in the local community to engage with during pre-application public consultation. This research involved identifying local stakeholders located around the site of the proposed development. The key stakeholder groups identified through this exercise include:

Community Councils

The proposed development sits within Strathisla Community Council area and borders Keith Community Council to the west. Consequently, both Community Councils have been updated throughout the pre-application stage of the proposed development.

Ward Councillors

The proposal is located in the Keith and Cullen ward of Moray Council. The following Ward Councillors were included as key stakeholders:

- Councillor Theresa Coull - SNP
- Councillor Donald Gatt - Conservative
- Councillor Laura Powell - Conservative

Following Local Government election on 5th May 2022, Councillor Tracy Colyer has replaced Councillor Laura Powell as Ward Councillor and will be included in all future correspondence.

Local Residents

All residential properties within a c.500m radius of the site have also been consulted as near neighbours. Approximately 10 residential properties have been identified within this area.

2.2 Publicity

2.2.1 Introduction to the Development

The pre-application public consultation began on 28th October 2021. This consisted of an email sent to both Strathisla and Keith Community Council, making them aware that RES was exploring the potential for an energy storage facility near Keith and that a Proposal for Application Notice (PAN) was being prepared for submission to Moray Council. The email welcomed members of both Community Councils to engage in a video or telephone call with RES in order for the project to be introduced and any initial questions answered. Unfortunately, this opportunity was not taken up by either of the Community Councils.

2.2.2 Proposal of Application Notice (PAN)

A PAN was submitted to Moray Council on 4th November 2021. A letter, via email, dated 3rd November 2021 was sent to both Strathisla and Keith Community Councils as well as the three Ward Councillors identified as key stakeholders, informing them that the PAN had been submitted.

2.2.3 Publicity for the Public Exhibition

Invitations

Over the 23rd - 24th November 2021, letters were sent to all key stakeholders identified in section 2.1 above, inviting them to attend an online public exhibition on Tuesday 30th November 2021. The letter also offered individual telephone or video call appointments between 10am - 2pm and 4pm - 8pm on the 30th November for anyone wishing to discuss the proposal or ask specific questions. Details as to how to book these appointments were included.

The letter also clarified that comment forms would be available on the website from the day of the exhibition, with the closing date for comments being 7th January 2022 - this has been considered as sufficient time for responses given the requirement of a period of at least 7 days where the public can submit questions and comments which must be responded to. It was also clarified that comments submitted to RES at the Online Public Exhibition would not be representations to the determining authority (Moray Council) but that the opportunity to submit formal representations to Moray Council would be available should a full planning application be submitted in the New Year.

A copy of the letter can be found in Appendix A.

Newspaper Advert

In order to maximise community awareness of, and attendance at, the online exhibition, RES placed a public notice advertisement containing details of the host website, date and timings of the exhibition in a local paper - the 'Northern Scot'. The advert ran in publications on the 19th and 26th November 2021. A copy of the advert can be seen Appendix B).

2.2.4 Online Public Exhibition

The online public exhibition took place on Tuesday 30th November 2021 between 10am - 2pm, and 4pm - 8pm. The host website was: www.drumfarm-energystorage.co.uk. The public exhibition was open between 10am - 2pm, and 4pm - 8pm to enable a wide cross section of the local community and stakeholders to attend, including people returning from work.

RES staff members were available during the public event to discuss the proposals with members of the community who booked slots, covering a range of specialisms, including technical, construction, environmental, development and community relations.

Presentation material on the website and available for the public exhibition included:

- A site location plan and address.
- A draft infrastructure layout plan of the proposal.
- An introduction to RES.
- The proposed electrical capacity of the project.
- The current stage of the project and the process moving forward.
- Information on the infrastructure to be installed on site and how the site will be accessed.
- Information about energy storage and its important role in the energy system.
- Detail on environmental considerations.
- Detail on landscape and visual aspects being considered.

- Contact details for relevant RES team members.

A feedback form was also provided on the host website to enable attendees to leave comments and provide contact details so that RES could provide updates during the course of the project to those interested. The form included a short questionnaire which asked how people had heard about the exhibition as well as a comment section which allowed them to address any concerns which they may have had about the proposal.

Hard copies of all exhibition material and the feedback form were available, on request.

Images from the online exhibition can be found in Appendix C.

Unfortunately, the exhibition was attended by 0 people and no individual telephone or video call appointments were requested.

2.2.5 Closing the Consultation

On 13th December 2021, follow-up posters were sent to all key stakeholders advising them of the recent online exhibition. It also directing stakeholders to the website where all information remained available to view; the website remained live due to the requirement of Moray Council to keep a distinction between the public event and the opportunity to view information relevant to the proposal.

The letter advised that members of the public could make representations during the pre-application period to RES by 7th January 2022. Links to online forms were provided and a means to obtain a hard-copy form also provided. Again, it was reiterated that comments submitted to RES via this means would not be representations to the determining authority, but that the opportunity to do so would be available should a full application be submitted. A copy of the letter can be seen in Appendix D.

2.2.6 Final Consultation

Given the lack of engagement with consultation to date, an email was sent to both Strathisla and Keith Community Councils on 10th March 2022, offering the opportunity for any members interested to meet with representatives from RES on the 24th March 2022, either on site or at another agreed location. The email also advised that a full planning application submission would be forthcoming. Unfortunately, this opportunity was also not taken up by either Community Council.

3 Consultation Responses

Despite RES' continued attempts to consult and engage with all key stakeholders local to the application site, none of the opportunities offered were accepted. Attendance at the online public exhibition event was also zero. Consequently, no specific issues of potential concern to the public have been identified. RES has, however, utilised feedback from similar community events to inform the design of the project.

4 Conclusion

This PAC report sets out the consultation in respect of a full planning application for the Drum Farm Energy Storage Facility near Keith. The PAC report confirms that all necessary statutory pre-application consultation has been undertaken and that guidance contained in the '*Coronavirus (COVID-19): planning guidance on pre-application consultations for public events*' has been followed. It shows that RES engaged early with the local community to encourage a constructive consultation process. Unfortunately, however, no responses from the local community were received and therefore no specific concerns could be addressed.

RES is committed to being a good neighbour and has an 'open door' policy which means that anyone can contact the company about the development at any stage and RES will respond in a timely manner. The Development Project Manager's and Community Relations Team's contact details have been made available for this purpose via the project website.

The project website will be updated regularly to enable people to keep up to date with the latest news about the proposed development as it progresses.

Once the planning application has been validated by Moray Council, RES will write to stakeholders, to provide them with the planning reference number and contact details for Moray Council's Planning Department, should they wish to submit a formal representation.

Appendix A - Online Exhibition Advert



Renewable Energy Systems Limited
Beaufort Court, Egg Farm Lane, Kings Langley
Hertfordshire, WD4 8LR, England, UK
+44 (0)1923 299 200 | info@res-group.com

The Owner/Occupier

██████████
Keith,
Moray,
AB55 5NS

23rd November 2021

To the Owner/Occupier,

RE: Energy Storage Facility at Drum Farm, near Keith

I am writing to advise that RES is exploring the potential for an energy storage project on land off Drum Farm, near Keith in Moray (please see enclosed location plan).

RES is the world's largest independent renewable energy company and has been operating from offices in Glasgow since 1993, employing around 120 local people. At the forefront of the renewables industry for nearly 40 years, RES has delivered more than 21GW of renewable energy projects across the globe including the development, construction and asset management of Scotland's first utility-scale battery storage facility, the 20MW Broxburn Energy Storage facility in Broxburn, West Lothian.

Energy storage 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, thus creating a more stable and secure electricity system. Increasing the installed capacity of energy storage is essential to enabling and accelerating the rollout of zero carbon energy to support the UK's net-zero emissions target.

At this early stage of the project we have submitted a Proposal of Application Notice (PAN) to Moray Council. To initiate our consultation period, we will be holding an **Online Public Exhibition** on **Tuesday 30th November** at www.drumfarm-energystorage.co.uk to provide further information on the proposal and gather comments from local residents. Comment forms will be available on the website from the day of the exhibition, with the closing date for comments being **7 January 2022**.

RES will also be offering individual telephone or video call appointments between **10am - 2pm** and **4pm - 8pm**, on the day, for anyone wishing to discuss the proposal further or ask specific questions. Appointments should be booked in advance. To book an appointment, for further information or to submit comments on the proposal please contact RES using the details at the bottom of this letter.

Please note that comments submitted to RES at the Online Public Exhibition are not representations to the determining authority (Moray Council). There will be an opportunity to submit

Appendix B - Newspaper Advert for Online Exhibition

RES Ltd, Ms Paula Batchelor



DRUM FARM ENERGY STORAGE SYSTEM

Online Public Exhibition



RES is exploring the potential for an energy storage project on land off Drum Farm, near Keith in Moray.

We are holding an **Online Public Exhibition on Tuesday 30th November**, to inform the local community about the project and gather comments on the proposal. Hard copies of materials will be available upon request.

The online event will be hosted on the Drum Farm Energy Storage System project website at www.drumfarm-energystorage.co.uk. Comments forms will be available on the website from the day of the exhibition. The online exhibition initiates a consultation period being run by RES to gather comments on the proposal. The closing date for comments is **7 January 2022**.

RES will be offering individual telephone or video call appointments between **10am-2pm & 4pm-8pm**, on the day, for anyone wishing to discuss the proposal further or askspecific questions. Appointments should be booked in advance.

To book an appointment, for further information or to submit comments on the proposal please contact Jenna Folkard at jenna.folkard@res-group.com or by calling **07823 340304**.



Please note that comments submitted to RES at the Online Public Exhibition are not representations to the determining authority (Moray Council). There will be an opportunity to submit representations to the determining authority should a planning application be submitted.

In line with current Government guidance, the Public Exhibition is being held online due to the current Covid-19 pandemic.

Appearance Date: Fri, 26/11/2021

Appendix C - Online Exhibition Material Samples

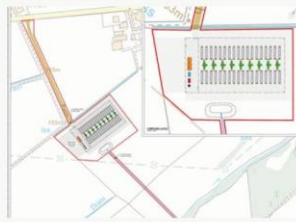
The screenshot shows a web browser displaying the 'DRUM FARM ENERGY STORAGE SYSTEM' website. The page is titled 'Online Public Exhibition' and includes a navigation menu with 'THE PROJECT', 'CONSULTATION', 'CONTACT US', and 'ABOUT RES'. A video player is embedded, showing a 'Drum Farm Welcome Video' with the text 'Welcome to the Drum Farm Energy Storage System Online Public Exhibition'. Below the video, there is text explaining the purpose of the exhibition and providing contact information for comments and appointments. The 'About the Project' section features a map of the site location and key details:

- Located on land off Drum Road
- Located 270m east of Keith Electrical Substation and approximately 1.2km east of the centre of Keith
- Located within an agricultural field and covers an area of approximately 1.2ha
- The project would have a capacity of 49.9MW
- There are no nationally important heritage designations in the immediate vicinity
- The site lies outside of any international, national or local environmental designations

Design Layout and Infrastructure

The proposed system is a containerised scheme, involving proven lithium ion battery technology which RES has deployed at multiple projects around the world

Access to the site would be via the existing grass track, which connects the site with Drum Road to the north. The track would be up upgraded to compacted stone



The infrastructure would include:

- Battery Containers
- Power Conversion Systems and Transformers
- Customer Substation
- Auxiliary Transformer
- Grid Compliance Equipment
- Security System

Why Energy Storage?

Our energy system is in a transitional period.

Ageing infrastructure is being replaced and greater flexibility introduced into our networks via technological advances, such as energy storage, to manage the increasingly complex supply and demand needs of the 21st Century

Energy storage is crucial in enabling the rollout of zero carbon energy and supporting the UK's net-zero emissions target



Click on image to enlarge

Renewable energy technologies are needed to replace electricity generation from fossil fuels, however, they generate electricity intermittently depending on weather conditions, which can cause imbalances in the electricity network

Energy Storage works by storing energy at times when generation exceeds demand and then releases electricity back to the national grid network when demand exceeds generation

Electricity is not physically generated on site

Environmental Considerations

RES will design the energy storage system so that it will fit sensitively in the surrounding landscape

A number of assessments will be carried out to ensure any potential impact upon the environment, landscape, heritage and local residents is appropriately assessed and mitigated



The assessments to be carried out will include:

- Noise & Vibration
- Ecology
- Heritage & Archaeology
- Flood Risk & Surface Water Management
- Cumulative Impacts

Landscape and Visual

The project is not located within any designated landscape areas

Care has been taken to avoid siting the project within the Countryside Around Towns (CATs) area

The project is located in an area with an existing industrial landscape



Views from Keith will be limited by residential properties and the existing electrical infrastructure

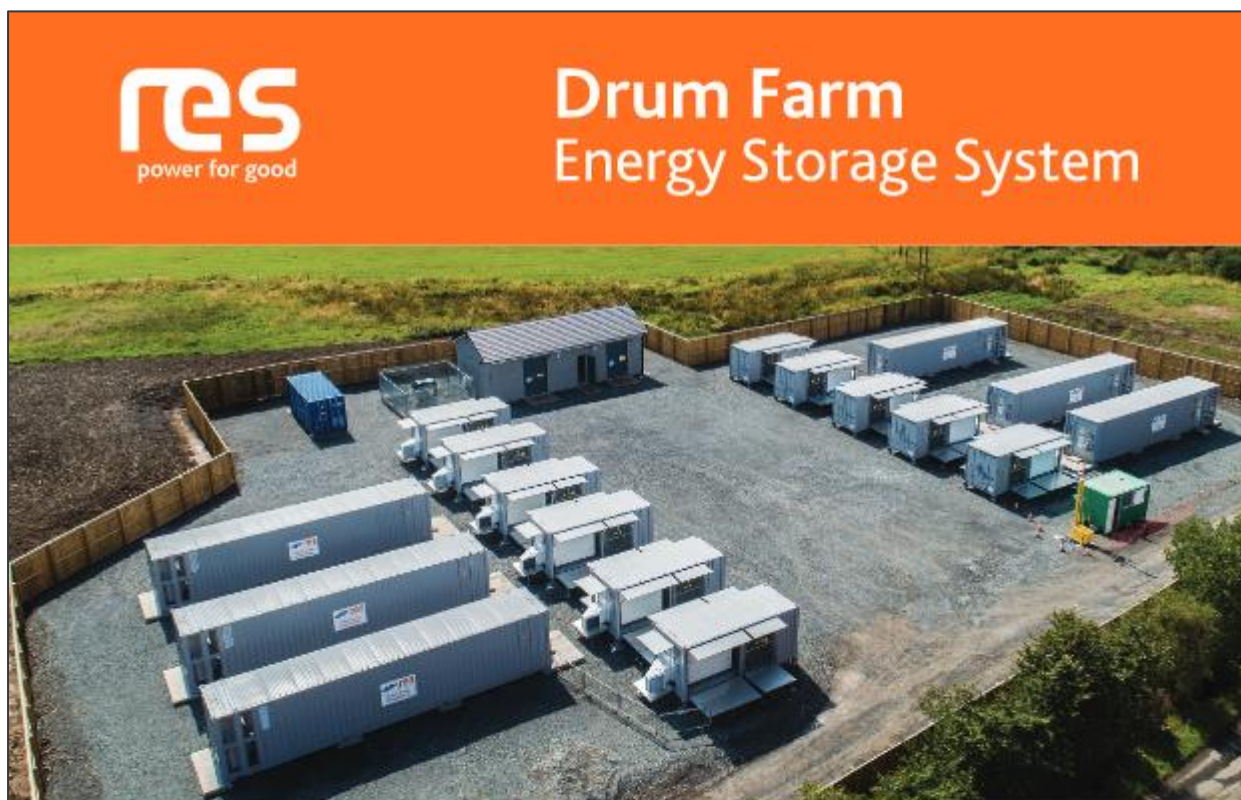
Landscaping and tree planting is proposed to reduce any potential visual impact from the Keith KT07 Green Roadies Path

Commenting on the Proposal

Comments on the proposal should be provided in writing. If you would like to make a comment on the proposal please complete the comments form [here](#). You can also download a copy of the comments form by clicking [here](#). If you would like a hard copy of the comments form please contact us.

Please note that comments submitted to RES at this time are not representations to the determining authority (Moray Council). There will be an opportunity to submit representations to the determining authority should an application be made.

Appendix D - Online Exhibition Follow-Up Poster



Drum Farm Energy Storage System

RES is exploring the potential for an energy storage project on land off Drum Farm, near Keith in Moray.

We are keen to engage with the local community and as part of our pre-application consultation, we recently held an online public exhibition to enable people to find out more about the proposal and provide us with their views. If you missed the exhibition, you can still view all of the information on our website at:

www.drumfarm-energystorage.co.uk/consultation

The exhibition initiated a consultation period being run by RES to gather comments on the proposal. Comments can still be submitted to RES – **the closing date for comments is 7 January 2022.**

Comments on the proposal should be provided in writing. Comments forms can be downloaded from the project website.

Hard copies of all exhibition material and the comments form are available on request. Please contact jenna.folkard@res-group.com for more information.

Please note that comments submitted to RES at this time are not representations to the determining authority (Moray council) There will be an opportunity to submit representations to the determining authority should an application be made.