

# **Pre-Application Consultation Report.**

## **Application for Battery Energy Storage System and Associated Infrastructure.**

On behalf of Braxbess Ltd.

Date: November 2023 | Pegasus Ref: P23-0094

Author: Rebecca Little

---



## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	November 2023	Rebecca Little – Planner	Chris Calvert – Executive Director	Peer review
2	November 2023	Rebecca Little – Planner	Chris Calvert – Executive Director	Peer review
3	November 2023	Rebecca Little – Planner	Chris Calvert – Executive Director	Client review



# Contents

Document Management.....	i
1. Introduction.....	1
2. Planning Policy Context .....	2
3. Pre-Application Consultation with the Energy Consents Unit (ECU) and East Lothian Council.....	3
4. The Community Consultation Process .....	4
5. Consultation Responses .....	23
6. Conclusion.....	28
Appendix.....	29

# 1. Introduction

1.1. This Pre-Application Consultation Report has been prepared by Pegasus Group on behalf of Braxbess Ltd. ("the Applicant") to accompany their full application for construction and operation of a Battery Energy Storage System (BESS), transformers, substations and associated infrastructure at land south of Barns Ness Terrace, Innerwick, East Lothian.

## 1.2. **Proposed Development**

1.3. This application seeks full planning permission for the following:

"Construction and operation of Battery Energy Storage System (BESS), transformers, substations and associated infrastructure."

1.4. As set out below, this statement is prepared pursuant to advice and guidance which encourages applicants to consult the local community in preparing development proposals, to provide local people with the opportunity to shape development in their area.

1.5. This statement therefore provides a full explanation of the pre-application consultation process and is accompanied by appendices that contain evidence of the consultation undertaken by the applicant. The outcome of the feedback will also be documented, and this statement will establish how the applicant intends to address these responses.

1.6. The role of pre-application discussions is not to seek to persuade or cajole people into supporting a project or application; rather it is to provide appropriate opportunities and environments within which people can communicate their concerns or aspirations about the proposed development. Those issues and aspirations are recorded and reported to those involved in the design of the project, or who are directly involved in the decision-making process.

1.7. This statement takes the following form:

**Section 2** looks at planning legislation, planning policy and guidance in relation to community engagement;

**Section 3** outlines the consultation process undertaken by the applicant; and

**Section 4** details a summary of the consultation responses received and how they have been considered.

## 2. Planning Policy Context

### Legislative Background

- 2.1. The importance of effective community engagement in the planning process has been emphasised through the introduction of the Community Empowerment (Scotland) Act 2015, which provided a greater focus on localism and strengthened local voices in decision-making processes.
- 2.2. Part 10 of the Act encourages Scottish public authorities to promote and facilitate the participation of members of the public in the decisions and activities of the authority, including matters of planning and development control.
- 2.3. By involving people and communities in local decision-making, the community itself becomes strengthened and empowered to express their needs to the local authority and therefore the authority itself can target its budgets more efficiently.
- 2.4. The Act also allows community bodies to submit participation requests to local authorities should they believe outcomes could be improved.

### Planning Advice Note 3/2010: Community Engagement

- 2.5. The Scottish Government produced a Planning Advice Note (PAN) on Community Engagement in 2010, which highlights the main purposes of community engagement:
  - Community engagement must be meaningful and proportionate;
  - Community engagement must happen at an early stage to influence the shape of plans and proposals.
- 2.6. The PAN also states that there is an onus on applicants and their agents to comply with the legal requirements to engage with the community before any application is made for a national or major development.

### Energy Consents Unit: Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989

- 2.7. When submitting an application to the Energy Consents Unit (ECU), there are expectations for pre-application consultation and engagement that have been established by the Scottish Government.
- 2.8. Carrying out pre-application consultation with the public is considered good practice and applicants should engage meaningfully with local communities who may be affected by the development proposals.
- 2.9. Applicants are expected to hold at least two public consultation events prior to submitting the application for their proposed development. These public events should give the local community the opportunity to make comments on the proposals and for their opinions to be voiced. The final consultation event should provide the public with feedback in light of their comments and how they have contributed to the process.

### **3. Pre-Application Consultation with the Energy Consents Unit (ECU) and East Lothian Council**

- 3.1. When submitting an application to the ECU, there are expectations for pre-application consultation and engagement that have been established by the Scottish Government.
- 3.2. The ECU have an established pre-application procedure for applications such as the proposals subject to this application. The ECU aim to write back within 21 days from when they receive the completed form. In most cases, once a case officer has been allocated to the project, they will have a look to have an initial meeting to discuss the project in further details as early as possible.
- 3.3. A request for pre-application advice was submitted to the ECU on 6<sup>th</sup> October 2023. An EIA screening request was submitted on the same day. An initial response was received on 6<sup>th</sup> October 2023. from the ECU advised the pre-application is currently pending while a screening opinion is sought from ECU. It is considered that the proposal is not EIA development.
- 3.4. East Lammermuir Energy Projects Stakeholder meetings have been organised. At the time of writing, one meeting has been held to date, prior to the submission of this application. This meeting was held on 25<sup>th</sup> October 2023, and a transport consultant from Pegasus Group attended this meeting on behalf of the applicant, where matters including cumulative impacts were discussed. A representative of Braxbess Ltd. attended a further stakeholder meeting on 29<sup>th</sup> November 2023.
- 3.5. Additionally, an Executive Director from Pegasus Group met virtually with the chair of East Lammermuir Community Council on the 6<sup>th</sup> November 2023. Another member of the project team met the chair in person on 16<sup>th</sup> November 2023, prior to the second public consultation exhibition. A meeting with the MSP took place on 20<sup>th</sup> November 2023.

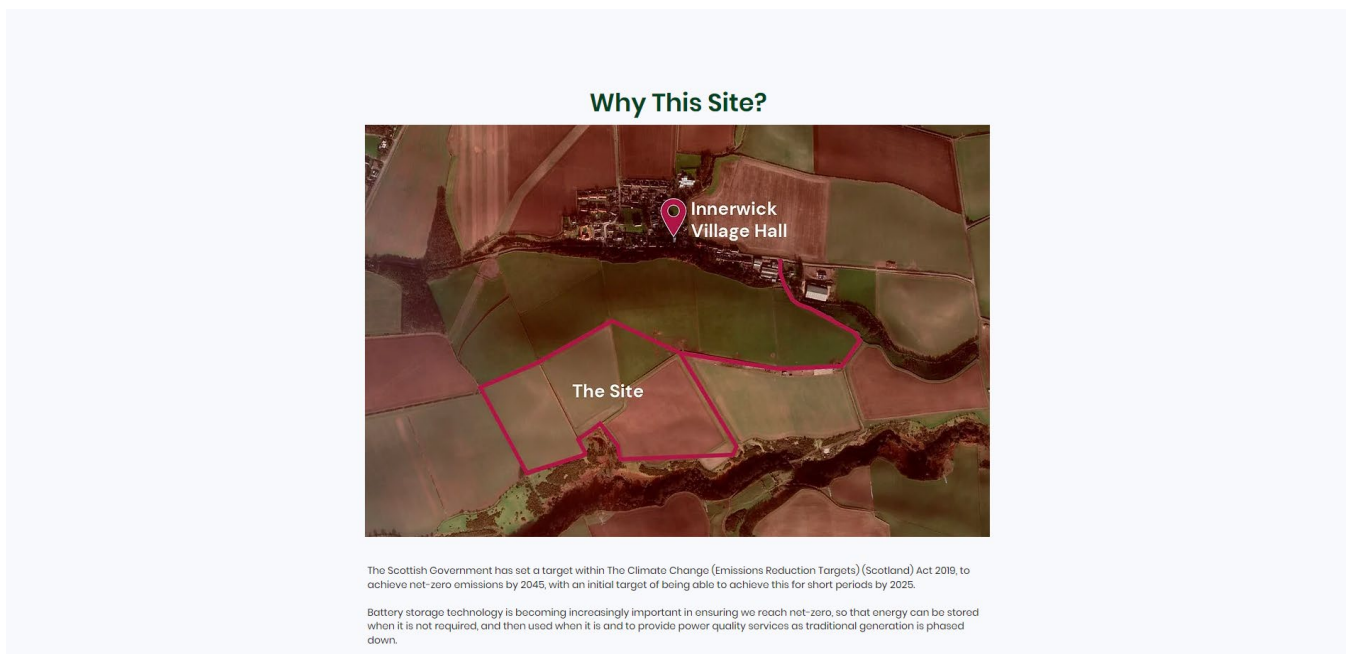
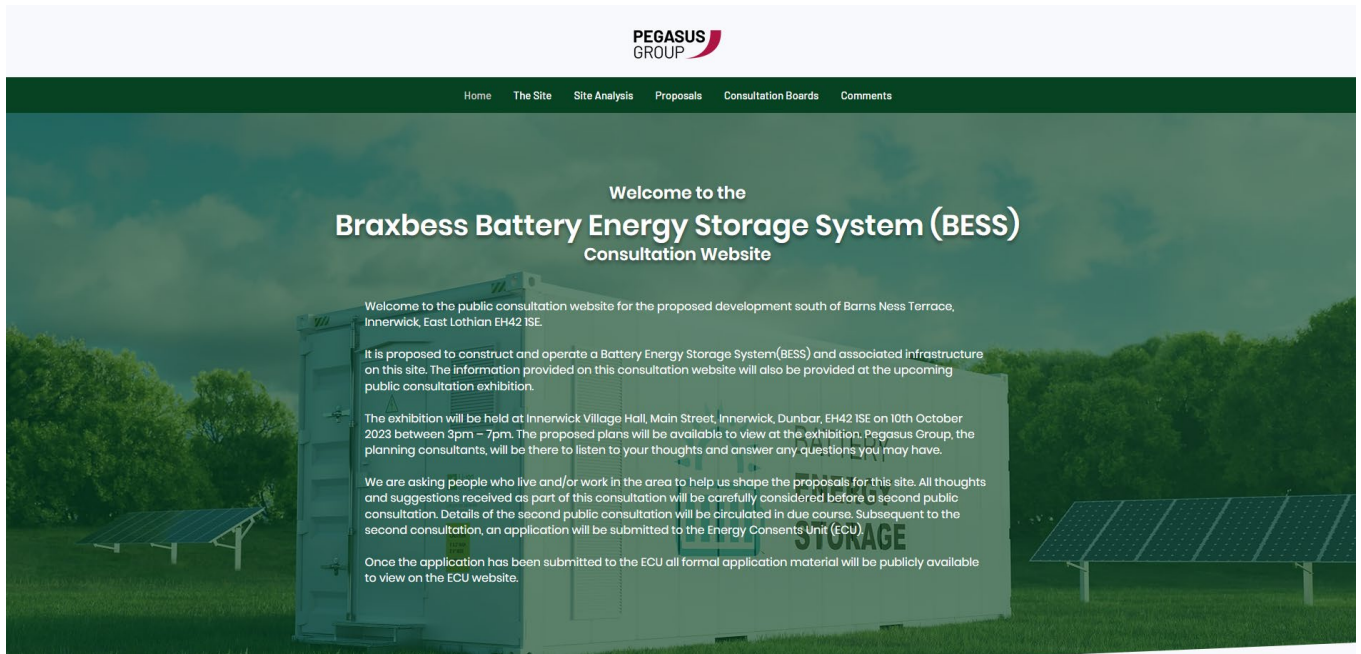
## 4. The Community Consultation Process

### First Public Consultation

- 4.1. The first public consultation exhibition was held on Tuesday 10<sup>th</sup> October between 3pm and 7pm at Innerwick Village Hall, Main Street, Innerwick, Dunbar, EH42 1SE.
- 4.2. To advertise the consultation event, flyers were posted to approximately 100 properties and businesses within 900m around the proposed site. The area of distribution was defined having regard to those residents which we considered may have a direct interest in the proposed development.
- 4.3. In addition, emails enclosing the flyer were sent to the following parties:
- Kenneth Wright MacAskill MP (East Lothian);
  - Paul McLennan MSP (East Lothian);
  - Donna Collins (Ward Councillor – Dunbar and East Linton);
  - Norman Hampshire (Ward Councillor – Dunbar and East Linton);
  - Lyn Jardine (Ward Councillor – Dunbar and East Lothian);
  - Chris Bruce (Chair – East Lammermuir Community Council);
  - Colin Bloomfield (Treasurer – East Lammermuir Community Council)
  - Julia Harrison (Innerwick councillor – East Lammermuir Community Council)
  - Keith Dingwall (Head of Planning at East Lothian Council);
  - Marek Mackowiak (Planning Officer at East Lothian Council);
  - Paul Zochowski (Planning Officer at East Lothian Council);
  - East Lothian Environmental Health;
  - East Lothian Roads Services;
  - Nature Scot; and
  - Coal Authority.
- 4.4. The Energy Consents Unit and East Lothian Council were also advised of the public consultation.
- 4.5. The exhibition was also published in the local newspaper – the East Lothian Courier – on 28<sup>th</sup> September 2023. (Appendix 1) and upon their website.
- 4.6. A project website ([www.braxbessstorage.co.uk/](http://www.braxbessstorage.co.uk/)) was launched on 4<sup>th</sup> October 2023. The consultation boards which were displayed at the exhibition were added to the website on

9<sup>th</sup> October 2023, to coincide with the exhibition on the 10<sup>th</sup> October 2023. The website provided a comments facility for people to submit their feedback online. The online comments facility was open for a period of 20 days.

4.7. The below images depict the layout of the first consultation website.





The Scottish Government has set a target within The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, to achieve net-zero emissions by 2045, with an initial target of being able to achieve this for short periods by 2025.

Battery storage technology is becoming increasingly important in ensuring we reach net-zero, so that energy can be stored when it is not required, and then used when it is and to provide power quality services as traditional generation is phased down.

Policy PROP EGT3: Forth Coast Area of Co-ordinated Action supports the principle of electricity grid connections on the Forth coast from Cockenzie to Torness in order to facilitate off-shore energy generation, provided certain criteria are met. An **Eastern Link Project** is proposed by others and will unlock the rich renewable energy capacity of Scotland and support the drive toward our Net Zero targets in Scotland and across the rest of the UK and run from Torness in East Lothian, Scotland to Hawthorn Pit, County Durham, England. This proposal for battery storage is proposed to link into this.

The proposed site meets the criteria of Policy PROP EGT3 and as such, is considered to be suitable for battery energy storage use.

The BESS is proposed to connect to the nearby SPT planned Branxton substation, currently under consideration under ref. 23/00816/PM. This substation is at a point in the network where renewable generation, including battery storage, can provide this power quality and resilience. Locating the BESS nearby to the Branxton substation ensures a cost effective and viable connection at this important node of the network.

The proposed battery storage energy facility would provide a significant contribution to the energy storage targets in the timescales necessary to contribute to Scotland's progress in meeting its renewable energy targets. It would also provide rapid-response electrical backup to the Scottish Power Transmission, providing a flexible system to balance energy supply and demand.

## Relevant Planning History

In terms of the wider context, we are aware of other planning proposals submitted by others in relation to other battery schemes and major grid infrastructure. Our proposals shall consider the cumulative effect of these proposals. Further details about these applications are as follows.

- Application for a 400kV substation and associated works submitted to East Lothian Council (ELC) under ref. 21/01566/PM and subsequently withdrawn. These proposals were then submitted under a revised application subsequently submitted to ELC under ref. 23/00816/PM and validated on 11th September 2023 and is currently under consideration. This proposed substation is required to support and operate the wider Eastern Link 1 project which comprises a new subsea High Voltage Direct Current (HVDC) link between Torness in East Lothian, Scotland and Hawthorn Pit in County Durham, England. A separate application for the proposed cables and converter station (application reference 22/00852/PM) was recently granted planning permission in principle by ELC.
- Application for planning permission in principle for electricity transmission infrastructure (including substation or converter station, cable bridge and curried cable) and associated development, as part of the offshore Berwick Bank Wind Farm ref. 23/00162/PPM currently under consideration by ELC.
- An application for an eastern link 400kV overhead line diversion submitted to ECU under ref. ECU00003419 and is currently under consideration.
- Application for onshore electricity transmission infrastructure submitted to ECU under ref. ECU0004659 and is currently under consideration. The electricity export capacity of the development is yet to be confirmed, but is expected to exceed 50 MW. The site is located approximately 3.5km from the site this public consultation relates to.

The BESS is proposed to connect to the nearby SPT planned Branxton substation. A planning application for this substation has been submitted to East Lothian Council and is currently under consideration under ref. 23/00816/PM. The proposed site is in close proximity to this substation, which is a nationally significant proposal. Proximity to a substation is important, given the manner in which energy is transferred, short connection routes are highly desirable, ensuring efficiency and speed of transmission when required. The proposal for battery storage at this location will provide further benefits in the form of energy storage as part of the Eastern Link Project.

## Site Analysis

The following works will be undertaken to support any future planning application on this site, and inform the final design of the scheme:



### Flood Risk and Drainage

The site is identified as having no specific risk of flooding as per the Scottish Environment Protection Agency Flood Hazard and Flood Risk Information. As such, the proposals will not increase the risk of flooding on site or in the local area.



## What is Proposed?

The proposal consists of the construction and operation of a BESS and associated equipment. The applicants have grid agreement of up to 850 MW. This figure will be refined as part of the consultation process and comments received as part of this 1st round of consultation will influence the 2nd round of consultation.

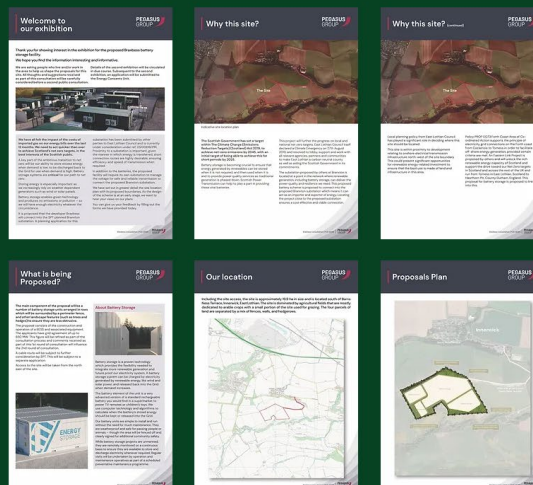
A cable route will be subject to further consideration by SPT. This will be subject to a separate application.

Access to the site will be taken from the north east of the site.

Further information regarding the proposal will be provided on the consultation boards.

## Consultation Boards

Consultation boards are available to download [here](#)



## Comments

We are asking people who live and/or work in the area to help us to shape the design proposals for this site prior to the submission of a planning application.

We would like to know your view on our proposals, what you think we should know about the surrounding area and how these points may influence our proposals.

If you want to share your thoughts about the project, you can type in comments within the comments box below and click 'Send Feedback'.

**All comments are gratefully received by 5:30pm on 24th October 2023**

Please indicate your gender: \*

☐ Male
 ☐ Female
 ☐ Prefer not to say

Please indicate your age: \*

☐ Under 18
 ☐ 18 - 35
 ☐ 36 - 55
 ☐ 56 - 70
 ☐ Over 70
 ☐ Prefer not to say

Post code: \*


☐ We are instructed by Braxbess in relation to development proposals at Braxton as part of a public consultation, with the objective of obtaining the views of people living or working in the area. All thoughts and suggestions received as part of this consultation will be carefully considered before an application is submitted to the Energy Consents Unit (and will be reported in a Pre-Application Consultation Report). The content of your responses (excluding any personal details) will be shared with the Energy Consents Unit.

Should you wish for your details to be deleted at any point please contact us via email at [leeds.admin.team@pegasusgroup.co.uk](mailto:leeds.admin.team@pegasusgroup.co.uk).

\*please visit [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk) to access our Privacy Notice.

**Thank you for taking the time to look at our proposals, we look forward to receiving your comments.**

Send Feedback



P23-0094

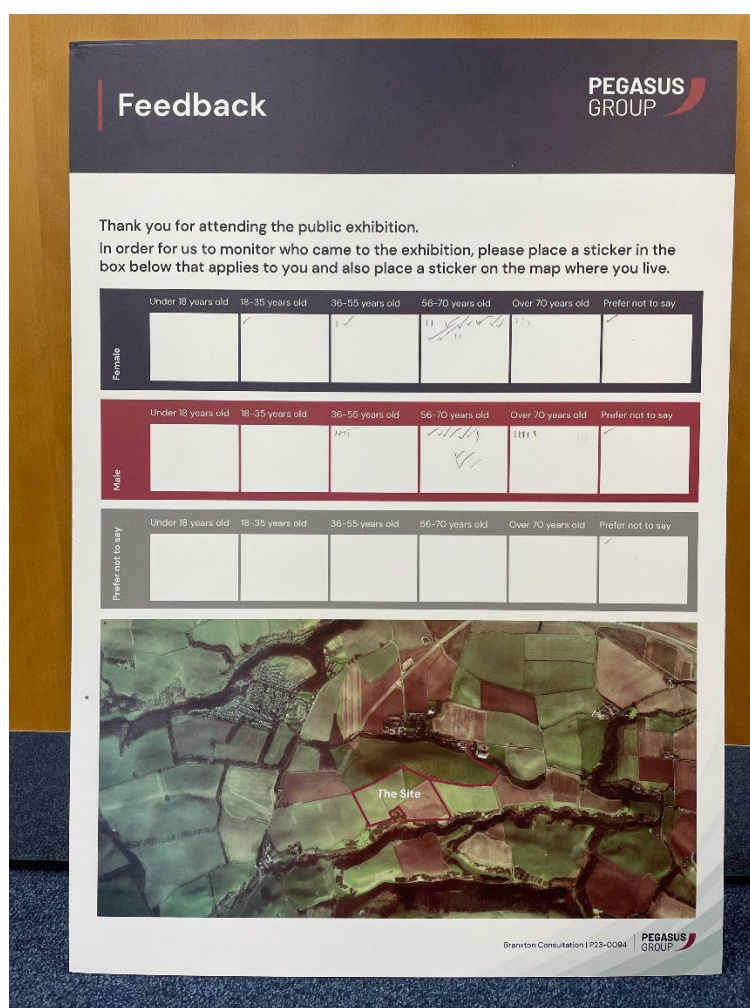
- 4.8. At the exhibition, information was made available that provided details of the proposals, including why the site was chosen, site analysis findings and the next steps for the proposals. Recognising the early stage in the design iteration process, the preliminary development proposals were set out on display boards at the exhibition. The material included a Site Location Plan, Initial Site Layout and Site Analysis which informed the attendants of the proposals and why the site was chosen. Representatives of the project team were in attendance throughout the exhibition and answered questions about the proposals, received feedback and answered queries.
- 4.9. Figure 1 overleaf shows the boards on display within Innerwick Village Hall, prior to the event starting,



Figure 1: Exhibition boards on display.

- 4.10. The actual attendance figure is estimated to be c50 participants, as not all attendees wished to provide details on the sign in board.
- 4.11. Those attending the event were invited to record their views on comment slips available at the event. This could be completed at the event or attendees had the option to submit their comments via the consultation website that was live in tandem with the event.
- 4.12. A monitoring exercise was undertaken at the exhibition to record gender, age and broad address details of attendees for an understanding of the demographics present. This was a useful exercise to understand the demographic profile of attendees, however it should be noted that participation in this was optional, and the data will not reflect every attendee.
- 4.13. An aerial map of the site and surrounding area was also provided on a board and attendees were invited to mark the location of their home or their work with a locator sticker. This illustrated to visitors and the project team the location profile of attendees (see Figure 2 overleaf). Again, this was not compulsory and therefore the data will not be reflective of every attendee.





**Feedback** **PEGASUS GROUP**

Thank you for attending the public exhibition.  
In order for us to monitor who came to the exhibition, please place a sticker in the box below that applies to you and also place a sticker on the map where you live.

	Under 18 years old	18-35 years old	36-55 years old	56-70 years old	Over 70 years old	Prefer not to say
Female						
Male						
Prefer not to say						

The Site

Branton Consultation | P23-0094 **PEGASUS GROUP**

Figure 2 : Registration board from 1<sup>st</sup> consultation event

### Website

- 4.14. The consultation website was visited by 71 unique visitors between 4<sup>th</sup> October and 24<sup>th</sup> October 2023<sup>1</sup>.

### Feedback

- 4.15. A total of 50 responses were received during the first consultation period, with 25 received as written comments during the exhibition and 21 received online. 4 comments were received via email.
- 4.16. The age profile of those who provided comment on the first public consultation has been compared against the age profile of the ward, Dunbar and East Linton. The charts below show that the respondents to the pre-application consultation were predominantly in the

<sup>1</sup> Please note, website traffic data can only be provided from respondents who accepted the website's cookie consent policy.

56–70 age group. However, the majority (37%) of respondents preferred not to state their age.

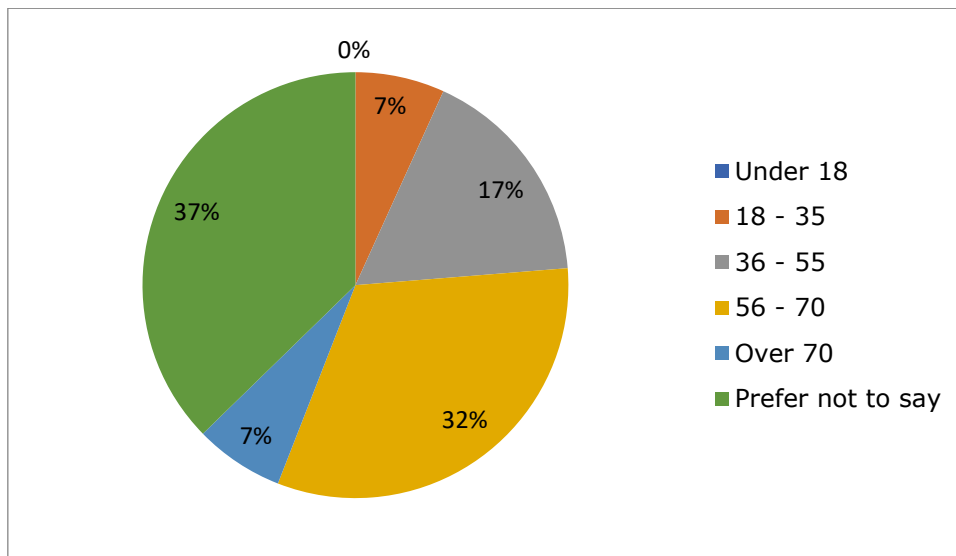


Figure 3: Age profile of respondents to first public consultation

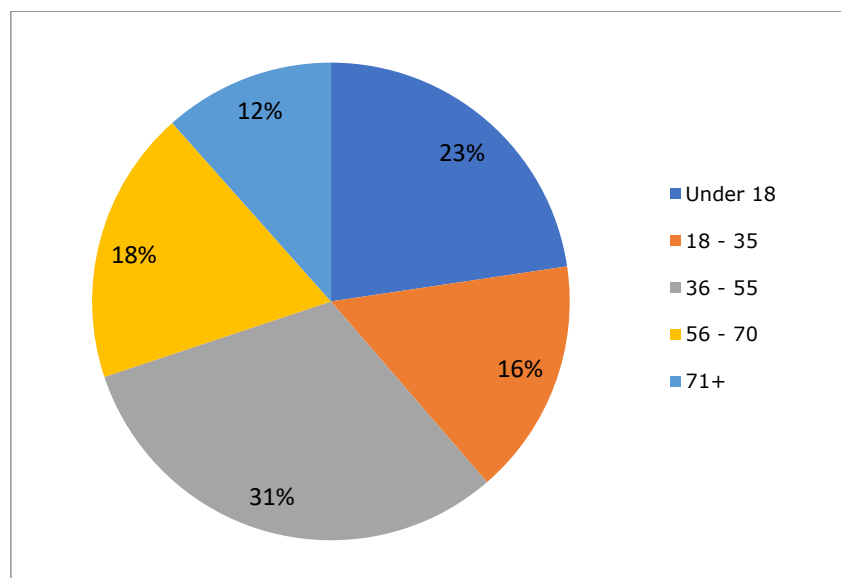


Figure 4: Age profile of Dunbar and East Linton ward

### **Second Public Consultation**

- 4.17. Further to the first round of public consultation, a second public consultation exhibition was held on 16<sup>th</sup> November 2023 between 3pm and 7pm at Innerwick Village Hall, Main Street, Innerwick, Dunbar, EH42 1SE.
- 4.18. Details of the second exhibition were also published in the local newspaper – the East Lothian Courier – on 9<sup>th</sup> November 2023 (Appendix 2) and upon their website. We are aware of a typo on the date. ECU was informed of this; dialogue was held with the East Lammermuir Community Council and the newspapers website version was corrected. The

wider flyer which was posted approximately 546 properties and business within 5km around the proposed site had the correct date on.

- 4.19. Further to comments received as part of the first consultation regarding the number of flyers posted out and local residents' preference for direct consultation, as opposed to the press advert, the consultation area was extended for the second round of public consultation. Flyers were posted to approximately 546 properties and business within 5km around the proposed site.
- 4.20. In addition, flyers and information was sent to the following parties:
- Kenneth Wright MacAskill MP (East Lothian);
  - Paul McLennan MSP (East Lothian);
  - Donna Collins (Ward Councillor – Dunbar and East Linton);
  - Norman Hampshire (Ward Councillor – Dunbar and East Linton);
  - Lyn Jardine (Ward Councillor – Dunbar and East Lothian);
  - Chris Bruce (Chair – East Lammermuir Community Council);
  - Colin Bloomfield (Treasurer – East Lammermuir Community Council)
  - Julia Harrison (Innerwick councillor – East Lammermuir Community Council)
  - Keith Dingwall (Head of Planning at East Lothian Council);
  - Marek Mackowiak (Planning Officer at East Lothian Council);
  - Paul Zochowski (Planning Officer at East Lothian Council);
  - East Lothian Environmental Health;
  - East Lothian Roads Services;
  - Nature Scot; and
  - Coal Authority.
- 4.21. Prior to the second exhibition opening, revisions were made to the proposals. Consultation boards were prepared for the second exhibition and uploaded to the consultation website, which re-opened on 9<sup>th</sup> November 2023.
- 4.22. It was noted that comments were received from the first round of consultation that more details about the proposals would have been appreciated. At the time of the first consultation, the project was still at an initial stage, with the plans still evolving. By the time of the second round of public consultation, the project had been through a number of design reviews and iterations, therefore extensive boards were able to be shown which provided considerable details about the project.



## Why This Site?

The Scottish Government has set a target within The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, to achieve net-zero emissions by 2045, with an initial target of being able to achieve this for short periods by 2025.

Battery storage technology is becoming increasingly important in ensuring we reach net-zero, so that energy can be stored when it is not required, and then used when it is and to provide power quality services as traditional generation is phased down.

Policy PROP EGT3: Forth Coast Area of Co-ordinated Action supports the principle of electricity grid connections on the Forth coast from Cockenzie to Torness in order to facilitate off-shore energy generation, provided certain criteria are met.

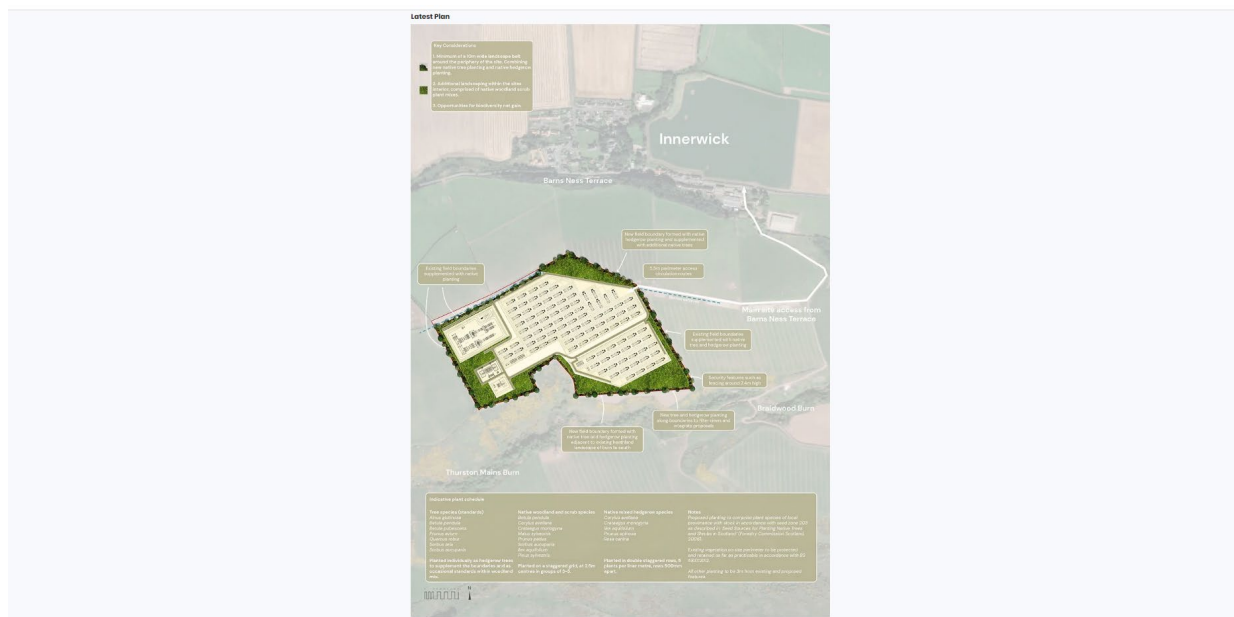
An [Eastern Link Project](#) is proposed by others and will unlock the rich renewable energy capacity of Scotland and support the drive toward our Net Zero targets in Scotland and across the rest of the UK and run from Torness in East Lothian, Scotland to Hawthorn Pit, County Durham, England. This proposal for battery storage is proposed to link into this.

The proposed site meets the criteria of Policy PROP EGT3 and as such, is considered to be suitable for battery energy storage use.

The BESS is proposed to connect to the nearby SPT planned Branxton Substation, currently under consideration under ref. 23/00616/PM. This substation is at a point in the network where renewable generation, including battery storage, can provide this power quality and resilience. Locating the BESS nearby to the Branxton Substation ensures a cost effective and viable connection at this important node of the network.

The proposed battery storage energy facility would provide a significant contribution to the energy storage targets in the timescales necessary to contribute to Scotland's progress in meeting its renewable energy targets. It would also provide rapid-response electrical backup, providing a flexible system to balance energy supply and demand.



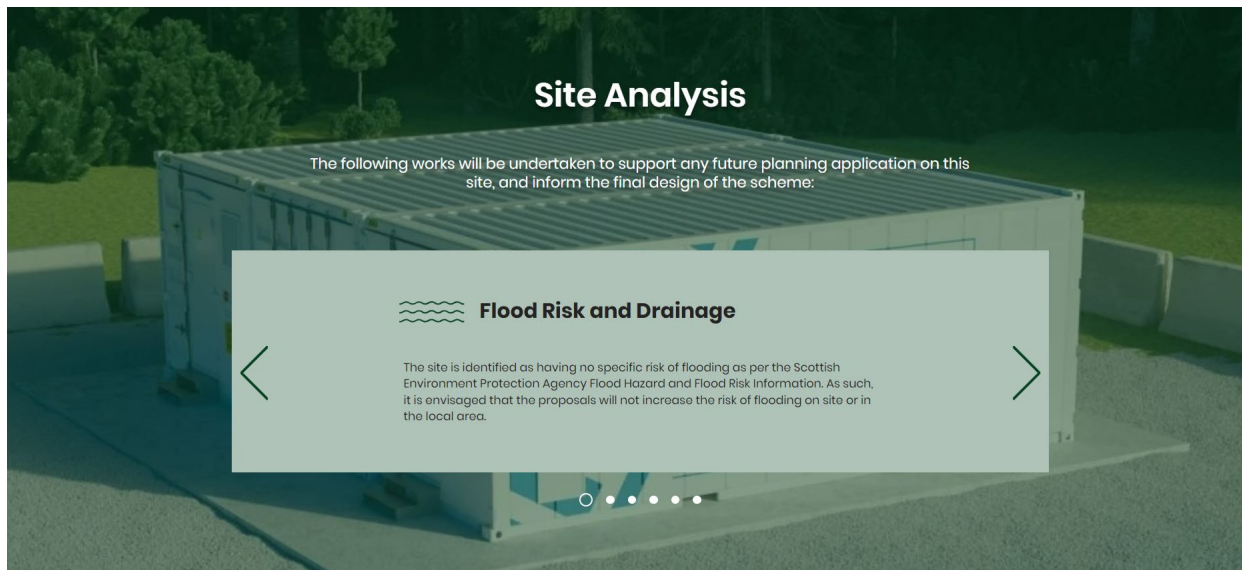


## Relevant Planning History

In terms of the wider context, we are aware of other planning proposals submitted by others in relation to other battery schemes and major grid infrastructure. Our proposals shall consider the cumulative effect of these proposals. Further details about these applications are as follows. Please let us know if there are any other applications you think we should be aware of and take into account.

- Application for a 400kV substation and associated works submitted to East Lothian Council (ELC) under ref. 21/01569/PM and subsequently withdrawn. These proposals were then submitted under a revised application subsequently submitted to ELC under ref. 23/00618/PM and validated on 11th September 2023 and is currently under consideration. This proposed substation is required to support and operate the wider Eastern Link 1 project which comprises a new subsea High Voltage Direct Current (HVDC) link between Torness in East Lothian, Scotland and Hawthorn Pit in County Durham, England. A separate application for the proposed cables and converter station (application reference 22/00852/PPM) was recently granted planning permission in principle by ELC.
- Application for planning permission in principle for electricity transmission infrastructure (including substation or converter station, cable bridge and curried cable) and associated development, as part of the offshore Berwick Bank Wind Farm ref. 23/00182/PPM currently under consideration by ELC.
- An application for an eastern link 400kV overhead line diversion submitted to ECU under ref. ECU00003419 and is currently under consideration.
- Application for onshore electricity transmission infrastructure submitted to ECU under ref. ECU0004659 and is currently under consideration. The electricity export capacity of the development is yet to be confirmed, but is expected to exceed 50 MW. The site is located approximately 3.5km from the site this public consultation relates to.

The BESS is proposed to connect to the nearby SPT planned Branxton substation. A planning application for this substation has been submitted to East Lothian Council and is currently under consideration under ref. 23/00618/PM. The proposed site is in close proximity to this substation, which is a nationally significant proposal. Proximity to a substation is important, given the manner in which energy is transferred, short connection routes are highly desirable, ensuring efficiency and speed of transmission when required. The proposal for battery storage at this location will provide further benefits in the form of energy storage as part of the Eastern Link Project.



## What is Proposed?

The proposal consists of the construction and operation of a Battery Energy Storage System (BESS), transformers, substations and associated infrastructure. The main component of the proposal will be 400 battery storage units arranged in rows which will be surrounded by a perimeter fence, and other landscape features (such as trees and hedges) to ensure they are less obtrusive.

The applicants have grid agreement of up to 650 MW. This figure will be refined as part of the consultation process and comments received as part of this second round of consultation will influence any future application.

A cable route will be subject to further consideration by SPT and will be subject to a separate application.

Access to the site will be taken from the north east of the site from Barns Ness Terrace. Including the site access, the site is approximately 19.4 ha in size.

The site is to be decommissioned after 40 years when it is no longer operational and restored to its former status.

The associated equipment would comprise:

### Battery Site

- 400 battery storage units – battery units arranged in rows around 7.5m in length, around 2.8m wide and around 3.1m in height;
- Switchgear containers – around 20m in length, 3.5m wide and around 3.1m in height;
- Inverters and transformers local to the batteries will be around 2.8m in length, 2.3m wide and 2.9m in height; and
- 3 substations and substation equipment, with some elements being in the region of 11m in height. Further details are as follows:

### Substation 1 (132kV)

- Control room – around 11.4m in length, around 3.3m wide and around 3m in height;
- 132kV transformers – around 11m in length, around 9m wide and around 5.7m in height;
- Removable panels;
- 132kV switch house enclosure – around 11m in length, around 15m wide and around 8.2m in height;
- Auxiliary transformer – around 2.6m in length, around 2.5m wide and around 2.8m in height; and
- Around 2.4m high palisade fence with secured access gate.

### Substation 2 (132kV)

- Control room – around 15.5m in length, around 3.3m wide and around 3m in height;
- 132kV transformers – around 12m in length, around 9m wide and around 5.7m in height;
- Removable panels;
- 132kV switch house enclosure – around 19m in length, around 15m wide and around 8.7m in height;
- Auxiliary transformer – around 2.6m in length, around 2.5m wide and around 2.8m in height; and
- Around 2.4m high palisade fence with secured access gate.

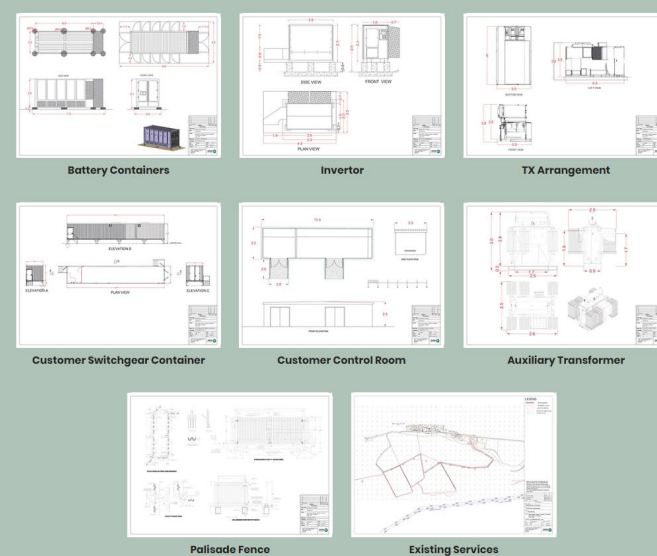
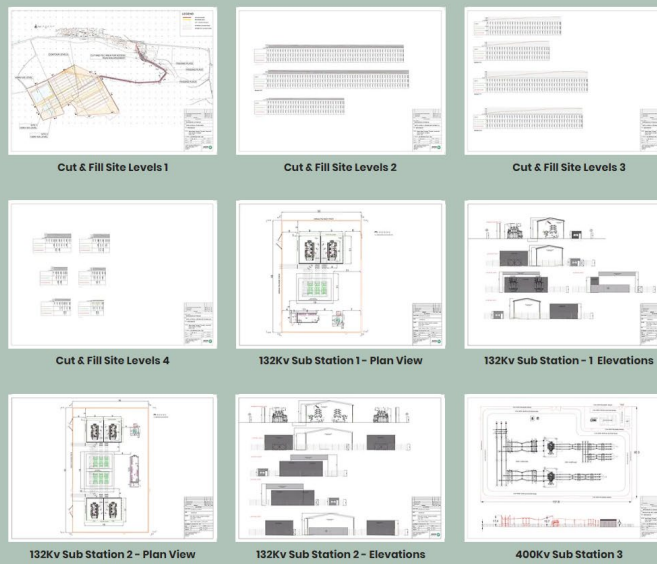
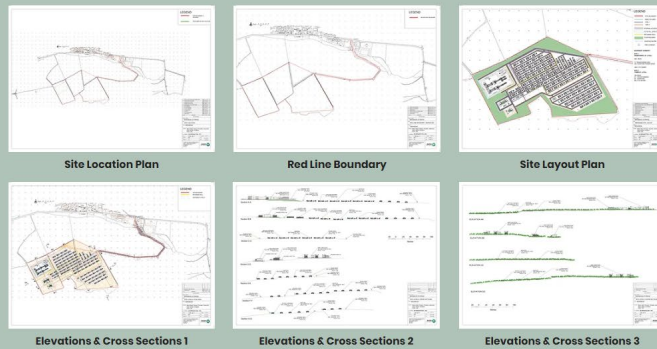
### Substation 3 (400kV) to be developed by SPT

- Auxiliary transformer around 15.1m in length, around 9.2m width and around 11.4m in height;
- Customer control room around 2.5m in height; and
- Around 3m high palisade fence.

### Other Details

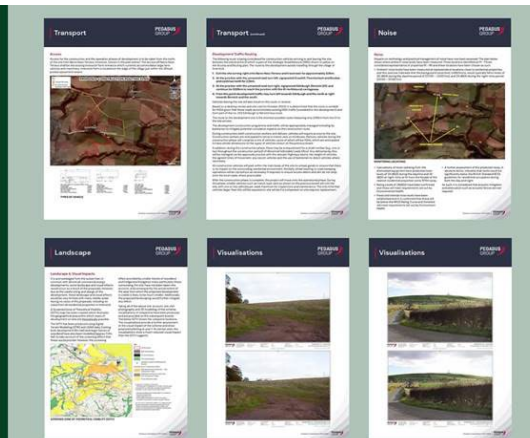
- Landscape features around the site will include native trees and hedgerow planting; and
- CCTV and light poles to be around 5m high.

## Technical Plans



## Consultation Boards

The consultation boards can be downloaded in pdf format [here](#)





## Comments

We are asking people who live and/or work in the area to help us to shape the design proposals for this site prior to the submission of a planning application.

We would like to know your view on our proposals, what you think we should know about the surrounding area and how these points may influence our proposals.

If you want to share your thoughts about the project, you can type in comments within the comments box below and click 'Send Feedback'.

**All comments are gratefully received by 5:30pm on 30th November 2023.**

Please indicate your gender: \*

☐ Male
 ☐ Female
 ☐ Prefer not to say

Please indicate your age: \*

☐ Under 18
 ☐ 18 - 35
 ☐ 36 - 55
 ☐ 56 - 70
 ☐ Over 70
 ☐ Prefer not to say

Post code: \*

Comments

☐ We are instructed by Braxbess Ltd in relation to development proposals for Braxbess Storage as part of a public consultation, with the objective of obtaining the views of people living or working in the area. All thoughts and suggestions received as part of this consultation will be carefully considered before an application is submitted to the Energy Consents Unit (and will be reported in a Pre-Application Consultation Report). The content of your responses (excluding any personal details) will be shared with the Energy Consents Unit.

Should you wish for your details to be deleted at any point please contact us via email at [leeds.admin.team@pegasusgroup.co.uk](mailto:leeds.admin.team@pegasusgroup.co.uk)

\*please visit [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk) to access our Privacy Notice.

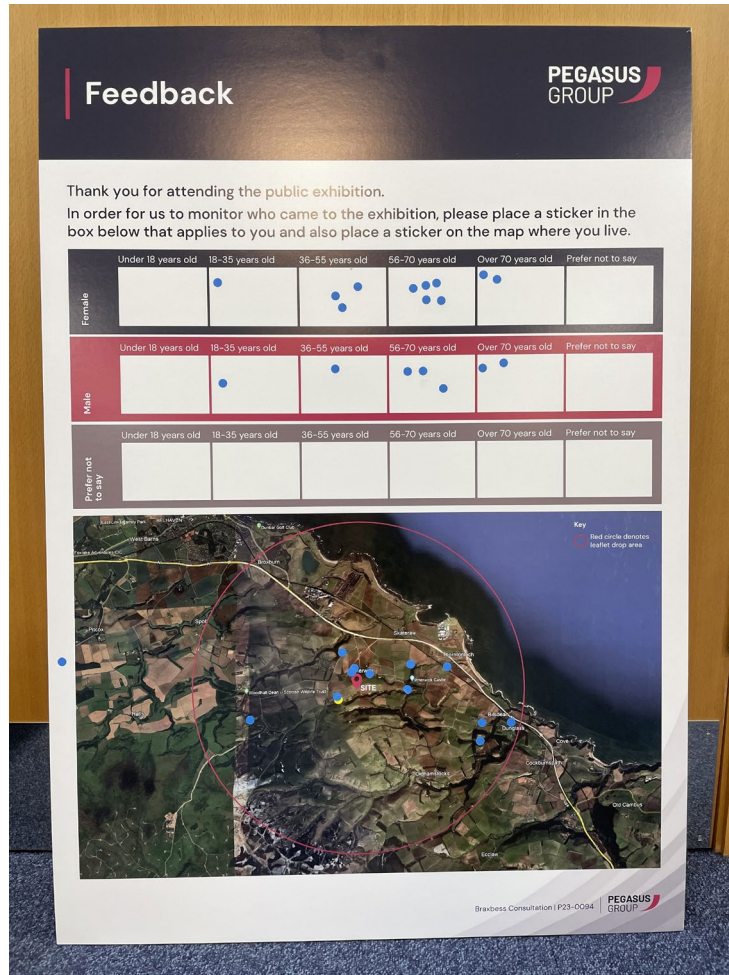
**Thank you for taking the time to look at our proposals, we look forward to receiving your comments.**

Send Feedback

- 4.23. The second public exhibition was attended by approximately 33 participants.
- 4.24. As with the first public exhibition, a monitoring exercise was undertaken at the exhibition to record gender, age and broad address details of attendees for an understanding of the demographics present. This was a useful exercise to understand the demographic profile of attendees, however it should be noted that participation in this was optional, and the data will not reflect every attendee.



- 4.25. An aerial map of the site and surrounding area was also provided on a board and attendees were invited to mark the location of their home or their work with a locator sticker. This illustrated to visitors and the project team the location profile of attendees (see below Figure 5).



**Feedback**

**PEGASUS GROUP**

Thank you for attending the public exhibition.

In order for us to monitor who came to the exhibition, please place a sticker in the box below that applies to you and also place a sticker on the map where you live.

	Under 18 years old	18-35 years old	36-55 years old	56-70 years old	Over 70 years old	Prefer not to say
<b>Female</b>		1	3	4	1	
<b>Male</b>		1	1	2	1	
<b>Prefer not to say</b>						

**Key**

- Red circle denotes leaflet drop area

**FIGURE 5: ATTENDANCE BOARD FROM SECOND PUBLIC EXHIBITION.**

Brexit Consultation | P23-0094

**PEGASUS GROUP**

Figure 5: Attendance board from second public exhibition.

- 4.26. Figures 6 and 7 overleaf shows the exhibition boards in situ for the second public exhibition, in Innerwick Village Hall.



Figure 6: Exhibition boards within Innerwick Village Hall.



Figure 7: Exhibition boards within Innerwick Village Hall.

#### Website

- 4.27. The updated consultation website launched on 9<sup>th</sup> November 2023, and comments were gratefully received until 30<sup>th</sup> November 2023.

4.28. As the above screenshots of the website show, information was made available on the website that provided revised and more in-depth details of the proposals and how the design iteration has evolved since the previous consultation. The material included a Site Location Plan, Latest Plan for Consultation, site analysis, what is being proposed, details on transport, noise, landscape and visual impacts, fire safety, heritage and drainage. Site cross sections, BESS elevations, and next steps were also provided on the boards, along with the applicant's responses to common queries that arose during the first public consultation. Technical plans were also provided on the consultation website.

4.29. The consultation website was visited by 31 unique visitors between 9<sup>th</sup> November and 30<sup>th</sup> November 2023<sup>2</sup>.

#### Feedback

4.30. A total of 30 responses were received during the second consultation period, with 21 received via the online comment form, 7 comments received on physical comment forms during the public exhibition. 2 comments were received via email.

4.31. Following the close of the second consultation, the demographics of the respondents was also compared against the age profile of the ward, Dunbar and East Linton.

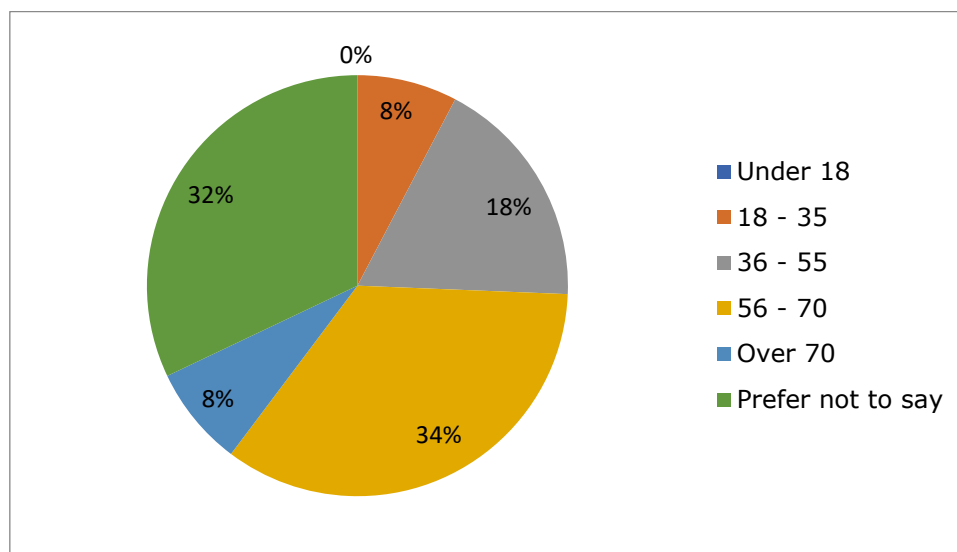


Figure: Age profile of respondents following second consultation.

<sup>2</sup> Please note, website traffic data can only be provided from respondents who accepted the website's cookie consent policy.



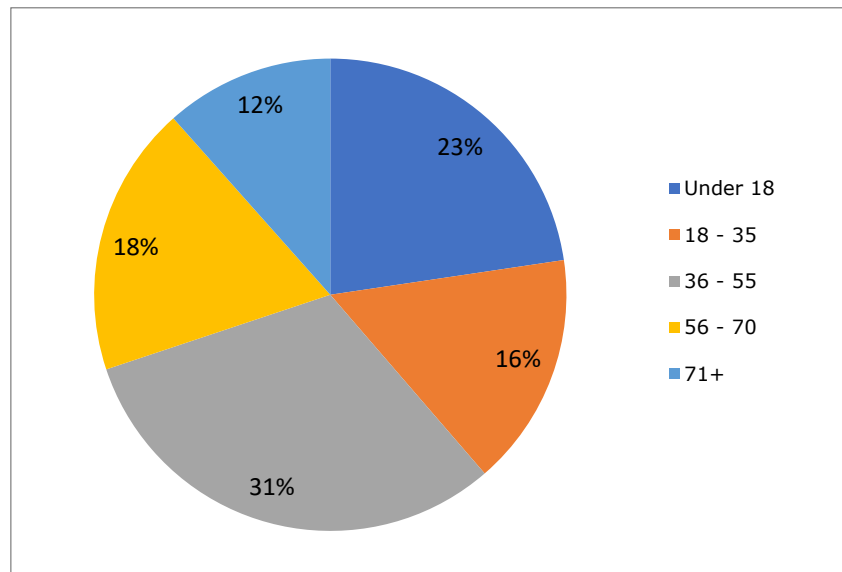


Figure: Age profile of Dunbar and East Linton.

- 4.32. It was noted that comments were received from the second round of consultation relating to the location of the tallest element (approx. 11.4m) which was located towards the north west of the site. This was shown as part of the consultation on the technical plans and a Screened Zone of Theoretical Visibility. Visualisations were also prepared at year 1 and provided as part of the second consultation.
- 4.33. Further to these comments, the design was reviewed and through this, it was concluded that this tallest element should be moved towards the south west of the site. Subsequently, an updated SZTV has been prepared and this shows that areas where “additional site element visibly only – 11.4m development height” (shown in brown) have substantially reduced and the scheme re-drawn as a result, with the final assessments drawing their conclusions from that amended scheme.
- 4.34. Through design iterations, it was also established that the proposal keeps away from Thurston Main Burn, located south of the site. Additionally, further to the visualisations at year 1 which were prepared for the second round of consultation, it was determined that a bund with mitigation planting should be added to the layout. This would mean that no parts of the proposal would be seen from outside the site.

## 5. Consultation Responses

- 5.1. The aims of the two public consultations were to provide local residents and stakeholders with the opportunity to comment on the development proposals, to establish their general views on the proposals, to raise any concerns that might have otherwise been missed and to make further suggestions to improve the scheme.
- 5.2. A number of attendees at the public consultations raised a number of matters to the applicant team, the main themes of which can be summarised as:
- Safety of batteries, including fire risk;
  - Construction traffic;
  - Noise levels;
  - Community benefit;
  - Ecological and landscape mitigation;
  - Visual impact; and
  - Location of cabling.
- 5.3. The responses received before, during and following the two consultation events have been considered as the application proposals have been finalised. The below table provides a summary of the most common matters raised and the applicant's response. Comment forms are available in full upon request.
- 5.4. It is acknowledged that pre-application consultation will not always change the views of those who wish to object to a development proposal, but it ensures that there is an opportunity to openly review and discuss the proposals with the developers and their consultant team and help shape the development.
- 5.5. Where possible, the concerns raised have been considered and where appropriate addressed through the application revisions since the undertaking of the public consultation event and detailed within the supporting documentation.
- 5.6. The below table details the nature of the comments received and the applicant's response.

Comment	Respondent ref.	Applicant's Response
<b><i>Principle of Development</i></b>		
Support the aspects of the proposal that contributes towards net-zero.	1, 3, 7, 8, 58.	Thank you for your support for the proposal.

Comments providing factual information.	2, 6, 9, 10, 12, 17, 20, 21, 22, 24, 25, 26, 27, 32, 34, 35, 36, 38, 39, 41, 42, 43, 44, 45, 51, 52, 56, 57, 59, 61, 64, 67, 68, 69, 70, 74, 77.	Thank you for your comments.
Object to the proposals.	4, 5, 11, 13, 14, 15, 16, 18, 23, 24, 26, 28, 29, 30, 31, 33, 37, 40, 46, 47, 48, 49, 50, 53, 54, 55, 60, 62, 63, 65, 66, 71, 72, 73, 75, 76, 80.	Thank you for your comments.
Concerns with timing of consultation events.	9, 21.	Thank you for your comments. Both consultation exhibitions were held between 3pm–7pm to allow as many people to attend as possible. For those who were unable to attend the exhibitions, all the information, including the consultation boards were provided on the consultation website where detailed information about the proposal could be found. Comments could also be submitted online via the consultation website.
Concerned that cumulative impacts being felt from other schemes.	13, 24, 35, 43, 45, 57, 63, 66, 72, 75, 76, 78, 79.	<p>Thank you for your comments. We acknowledge the existence of other proposals in the nearby area, and we are attending meetings with representatives of East Lammermuir Community Council to address stakeholder concerns.</p> <p>The reports submitted as part of this application considers and assesses cumulative impacts.</p>
<b>Residential Amenity</b>		
Concerns about proximity of development to residents.	29, 43, 60, 62, 66, 70, 80.	Thank you for your comments. The design has considered the area surrounding the proposed site. A landscape masterplan has been prepared which proposes a

		<p>minimum of a 10m wide landscape belt around the periphery of the site, combining new native tree planting and native hedgerow planting. Additional landscaping within the sites interior is also proposed, comprised of native woodland scrub plant mixes.</p> <p>Visualisations have also been prepared which shows the different viewpoints looking towards the site.</p> <p>Further to the public consultations, the design of the proposal has been reconsidered, with the tallest structure of the proposal moved to a different location within the site, so it is better screened and less visible from outside the site. The SZTV submitted as part of the proposal is based on the updated heights of the proposal and shows that the elements will be less visible.</p>
<b>Highways Impacts</b>		
Concerns about road safety with construction traffic.	1, 2, 23, 24, 29, 30, 31, 34, 36, 39, 43, 55, 57, 65, 67, 69, 70, 72, 73, 74, 80.	Thank you for your comments. A draft Construction Traffic Management Plan has been prepared in support of the application to the Energy Consents Unit. This report considers that the proposed access arrangement and the construction route are suitable to accommodate the low number of construction and operation trips associated with the proposed BESS.
Concerns about the site access.	1, 34, 67.	
<b>Fire Safety</b>		
Concerns about how events of fire may be dealt with and their impacts.	4, 19, 21, 23, 43, 45, 47, 50, 57, 62, 72, 77, 80.	<p>Thank you for your comments.</p> <p>The applicant has implements a number of design details to improve the safety of the proposal. This includes:</p> <ul style="list-style-type: none"> <li>- Fire walls; and</li> <li>- Batteries space out for fire breaks so that any potential fire cannot escape on rack.</li> </ul>

		Once permissions are granted, the applicant will have conversations with the fire safety officer to discuss this further. Matters relating to fire safety will be discussed as part of the separate consent process.
<b>Noise Impacts</b>		
Concern about level of noise that could be emitted.	28, 36, 60 62, 66, 77.	Thank you for your comments. The indicative plans and consultation boards showed the potential for noise attenuation on the site. The Noise Assessment that has been submitted as part of the application to the ECU demonstrates that the scheme is acceptable in noise terms, with acoustic attenuation.
<b>Benefits to local community</b>		
Concerns about whether the facility will store power generated locally and will be transmitted into the local network.	11, 14, 15, 32, 38, 56.	<p>The proposed battery storage energy facility would provide a significant contribution to the energy storage targets in the timescales necessary to contribute to Scotland's progress in meeting its renewable energy targets. It would also provide rapid-response electrical backup, providing a flexible system to balance energy supply and demand.</p> <p>The applicant is in discussions with the Community Council regarding potential community benefits and a developers charter.</p>
<b>Ecological Impacts</b>		
Development is in close proximity to valued ecological sites.	28, 38, 48, 54, 63, 66, 64, 70, 74.	<p>Thank you for your comments. A Habitat Regulations Assessment (HRA) and Ecological Impact Assessment (EclA) are submitted as part of this application.</p> <p>The EclA sets out that an extended phase 1 habitat survey was undertaken and identified protected species groups which could be present on site and impacted by the proposed development.</p>

		<p>The HRA has been prepared to provide the necessary information to enable East Lothian Council to assess potential impacts of the proposal on Internationally Important Wildlife Sites (IIWS).</p> <p>Opportunities for a net gain in biodiversity terms is also accounted for within the submission.</p>
<b>Visual Impact</b>		
Concern about the visual impact of the proposals.	38, 42, 47, 49, 62, 67.	<p>Thank you for your comments. The design has considered the area surrounding the proposed site. A detailed landscape masterplan and Landscape Visual Assessment is submitted alongside the proposals to the Energy Consents Unit.</p> <p>As part of the consultation events and landscaping for the scheme, a 10m wide landscape belt around the periphery of the site was proposed, combining new native tree planting and native hedgerow planting. Additional landscaping within the sites interior is also proposed, comprised of native woodland scrub plant mixes.</p> <p>Visualisations had also been prepared which show the different viewpoints looking towards the site.</p> <p>Further to the public consultations, the design of the proposal has been fundamentally reconsidered, with the tallest structure of the proposal moved to a different location within the site, so it is better screened and less visible from outside the site. The SZTV submitted as part of the proposal is based on the updated heights of the proposal and shows that the elements will be less visible.</p> <p>The applicant welcomed and has responded positively to the feedback received on this topic matter.</p>

## 6. Conclusion

- 6.1. The purpose of the pre-application public consultation undertaken by the applicant was to build an understanding and awareness of the project by local people and the local planning authority and to seek feedback to be used to shape the scheme.
- 6.2. The applicant has also worked proactively to engage the local community in advance of the application submission. Local people have had the opportunity to engage with the proposals through the distribution of response forms at the consultation event and physical flyers delivered via post and email.
- 6.3. The comments and feedback received during the pre-application consultation with the local community have been reviewed and the applicant has responded to the comments, suggestions and questions raised. Where possible, feasible changes have been made and additional information supplied to address comments and suggestions the public provided.
- 6.4. In summary, the applicant considers that pre-application consultation undertaken with the local community and stakeholders has been timely, meaningful and effective.

## Appendix 1 – Newspaper Notice of First Consultation

**Public Consultation Exhibition for a Battery Energy Storage System (BESS) transformers, and associated infrastructure at land south of Barns Ness Terrace, Innerwick, East Lothian, EH42 1SE.**

You are invited to attend a public exhibition being held at Innerwick Village Hall, Main Street, Innerwick, Dunbar, EH42 1SE on

**Tuesday 10th October 2023.**

Drop-in anytime between 3pm – 7pm.

The proposed plans will be available to view at the exhibition. Members of the project team and Pegasus Group, the planning consultants, will be there to listen to your thoughts and answer any questions you may have.

[www.braxbessstorage.co.uk](http://www.braxbessstorage.co.uk), the project website is accessible to view with all of the information and will be available on the day for those that cannot attend in person.

A second consultation will be held prior to an application being submitted to the Energy Consents Unit and details will be circulated in due course.



## Appendix 2 – Flyer Notice of First Consultation

Development at:

**Land South of Barns Ness Terrace,  
Innerwick, East Lothian, EH42 1SE**





It is proposed to construct and operate a Battery Energy Storage System (BESS), transformers and associated infrastructure on Land South of Barns Ness Terrace, Innerwick, East Lothian, EH42 1SE



You are invited to visit a public exhibition which will be held at Innerwick Village Hall, Main Street, Innerwick, Dunbar, EH42 1SE on:

**Tuesday 10<sup>th</sup> October 2023**  
**Drop-in anytime between 3pm – 7pm**

The proposed plans will be available to view at the exhibition. Members of the project team and Pegasus Group, the planning consultants, will be there to listen to your thoughts and answer any questions you may have.

[www.braxbessstorage.co.uk](http://www.braxbessstorage.co.uk), the project website is accessible to view with all of the information and will be available on the day for those that cannot attend in person.

A second consultation will be held prior to an application being submitted to the Energy Consents Unit and details will be circulated in due course.

**We look forward to hearing from you!**

## Appendix 3 – Newspaper Notice of Second Consultation



### What is planned?

#### Public Consultation Exhibition for a Battery Energy Storage System (BESS)

##### Transformers, Substations and Associated Infrastructure at Land South of Barns Ness Terrace, Innerwick, East Lothian, EH42 1SE

You are invited to attend a public exhibition being held at Innerwick Village Hall, Main Street, Innerwick, Dunbar, EH42 1SE on Thursday 16th November 2023.

Drop in anytime between 3pm–7pm.

The proposed plans will be available to view at the exhibition.

Members of the project team and Pegasus Group, the planning consultants, will be there to listen to your thoughts and answer any questions you may have.

[www.braxbessstorage.co.uk](http://www.braxbessstorage.co.uk), the project website is accessible to view with all of the information and will be available on the day for those that cannot attend in person.

An initial consultation exhibition was held on 10th October 2023.

Following this second round of public consultation, the application will be prepared and submitted to the Energy Consents Unit.

## Appendix 4 – Flyer Notice of Second Consultation

Development at:

**Land South of Barns Ness Terrace,  
Innerwick, East Lothian, EH42 1SE**





It is proposed to construct and operate a Battery Energy Storage System (BESS), transformers, substations, and associated infrastructure on Land South of Barns Ness Terrace, Innerwick, East Lothian, EH42 1SE



You are invited to visit a public exhibition which will be held at Innerwick Village Hall, Main Street, Innerwick, Dunbar, EH42 1SE on:

**Thursday 16<sup>th</sup> November 2023**  
**Drop-in anytime between 3pm – 7pm**

The proposed plans will be available to view at the exhibition. Members of the project team and Pegasus Group, the planning consultants, will be there to listen to your thoughts and answer any questions you may have.

[www.braxbessstorage.co.uk](http://www.braxbessstorage.co.uk), the project website is accessible to view with all of the information and will be available on the day for those that cannot attend in person.

An initial consultation exhibition was held on 10th October 2023. This second consultation is now being held prior to an application being submitted to the Energy Consents Unit.

**We look forward to hearing from you!**

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

## Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: 33 Sheep Street, Cirencester, GL7 1RQ

We are ISO certified 9001, 14001, 45001



Pegasus\_Group



pegasusgroup



Pegasus\_Group

**PEGASUSGROUP.CO.UK**