

# BORALEX

*Beyond*  
RENEWABLE ENERGY™



## Loch Toftingall Battery Energy Storage System

### Pre-Consultation Application Report

September 2023



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## Table of Contents

	<b>Executive Summary</b>	<b>2</b>
<b>1.</b>	<b>Introduction</b>	<b>3</b>
<b>2.</b>	<b>Framework for pre-application consultation</b>	<b>3</b>
<b>3.</b>	<b>Boralex's approach to community involvement</b>	<b>3</b>
<b>4.</b>	<b>Consultation</b>	<b>4</b>
	4.1 Community Council engagement	
	4.2 Information Postcards	4
	4.3 Freephone	4
	4.4 Online Consultation Website	4
	4.5 Social Media	4
	4.6 Community Open Days	4
<b>5.</b>	<b>Consultation Feedback</b>	<b>6</b>
	5.1 Newsletter	6
	5.2 Online Consultation Website	6
	5.3 Community Open Days	6
	5.4 Issues	7
	5.5 Summary of Feedback	9
<b>6.</b>	<b>Response to Consultation Feedback</b>	<b>10</b>
<b>7.</b>	<b>Future Consultation and Community Liaison</b>	<b>11</b>
<b>8.</b>	<b>Appendices</b>	
	Appendix 1 Proposal of Application Notice	
	Appendix 2 Stakeholder Correspondence	
	Appendix 3 Community Open Day Invitation Postcards	
	Appendix 4 Community Open Day Information Panels	
	Appendix 5 Community Open Day Photographs	
	Appendix 6 Community Open Day Media Coverage	
	Appendix 7 Community Open Day Questionnaire Sample	
	Appendix 8 Community Open Day Enquiry Form	
	Appendix 9 Returned Community Open Day Questionnaires	
	Appendix 10 Planning Aid for Scotland's SP=EED framework	

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## Executive Summary

In line with both The Highland Council's advice, 'Pre-Application Consultation: A Guide for Communities', alongside Planning Advice Note 3/2010 which includes the National Standards for Community Engagement, and Planning Aid for Scotland's SP=EED framework, Boralex Limited ('Boralex') has undertaken two rounds of consultation for its Loch Toftingall Battery Energy Storage System proposal ('the Proposed Development').

In October 2022, a Pre-Application Consultation request was submitted to The Highland Council (Appendix 1). A first round of consultation was undertaken in January 2023, with a follow up round of consultation undertaken in March 2023.

Boralex expects consultation activity to continue throughout the planning application process.

Consultation activity so far has included:

- distribution of invitation postcards to local addresses;
- a dedicated project website with online consultation tool ([www.lochtoftingallwindfarm.co.uk](http://www.lochtoftingallwindfarm.co.uk));
- social media activity;
- a Freephone telephone number;
- community open days held on 31<sup>st</sup> January in Spittal Village Hall and 1<sup>st</sup> February in Watten Village Hall; and
- follow up community open days held on 14<sup>th</sup> March in Spittal Village Hall and 15<sup>th</sup> March in Watten Village Hall.

Local residents and other key stakeholders were invited to attend the open days. The first round was publicised via a postcard sent out to all addresses (415) within a 5km radius of the project and editorial coverage in the John O'Groat Journal, as well as promotion on social media. The second round was again publicised via a postcard mailing, this time increased to cover a 10km range which increased the address data to 1223 properties.

At the Community Open Days (CODs) members of the development team were on hand to explain the proposals, discuss the wider issues around onshore wind and battery development and demonstrate landscape and visual impact via photomontages. Those attending had the opportunity to discuss their views with the project team and also complete feedback questionnaires. Local residents also had the opportunity to air their views via the project website, social media sites and Freephone telephone number.

A total of 69 people attended the exhibitions (some to both rounds), 7 opinion forms were received, 4 following the first round and 3 following the second round.

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Of those who responded to the first round of public consultation asking how they felt about the Proposed Development, 1 person stated they were very supportive of the Proposed Development and 3 were very opposed.

Following the second round of consultation, one person was undecided and 2 were very opposed.

Boralex has written to all local residents who raised questions or concerns via the various feedback mechanisms. Consultation is on-going and will continue post submission.

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## 1. Introduction

Boralex embraces community consultation; it is at the heart of its approach to development. This report provides detailed information regarding the Proposed Development pre-application community consultation.

## 2. Framework for pre-application consultation, Loch Toftingall Battery Energy Storage System

Boralex's public consultation plans for the Proposed Development were influenced by the Highland Council's Statutory Advice, 'Pre-Application Consultation: A Guide for Communities' alongside PAN 3/2010 which includes the National Standards for Community Engagement and Planning Aid for Scotland's SP=EED framework (**Appendix 10**).

Both documents outline how applicants of major infrastructure projects should undertake pre-application consultation with the community. The aim of this procedure is to make sure that communities are made aware of, and have an opportunity to comment on, these types of development proposals before a formal application is made. This allows community views to be reflected early in the process and gives the developer the opportunity to incorporate them into the proposals before making a formal application, as was the case with the Proposed Development, where the project changed significantly following the initial consultation process.

The Guide outlines the consultation and involvement activities:

- Community Council consultation;
- Adverts and press releases in local media; and
- Public Events (at least one).

## 3. Boralex's approach to community involvement

Boralex's general approach to community involvement in projects includes the following:

- Consultations with community councils and interested community groups;
- Establishment of a dedicated project website;
- Production and circulation of printed information material for local residents;
- Information and dialogue via social media platforms; and

- Hosting of community open days prior to submission of the planning application, when the development is at draft design stage.

## 4. Consultation

Consultation that has taken place so far in this pre-application stage has enabled Boralex to take forward its commitment to developing a constructive relationship with residents and local representatives within the local community as well as make changes to the project in line with feedback received.

To consult on the proposal with the local community, Boralex undertook the following activities:

### 4.1 Key Stakeholder Engagement

Boralex wrote to the Chair of Watten Community Council (CC) in May 2019 to advise that plans for a wind energy development at Loch Toffingall were being considered by the Company. A number of factors including the Covid-19 pandemic, delayed the process until 2022. Further correspondence was had with Watten CC as the host community regarding the emerging proposals and asking for feedback on the locations proposed for community consultation events.

On the submission of the Proposal of Application Notice (PoAN) (**Appendix 1**), Boralex wrote to the host CC as well as the neighbouring CC's of Halkirk and Bower with the PoAN and associated documents advising of the Community Open Day (COD) details and providing contact information for any questions at that stage.

In addition to the CCs, Boralex wrote to each of THC's Ward Members, the local MSP and also MP advising of the PoAN and of the consultation events.

This correspondence can be found in **Appendix 2**.

### 4.2 Information Postcard

In January 2023, Boralex distributed 415 information postcards (**Appendix 3**) to the local community within a 5km radius of the project. The postcards were posted via Royal Mail (1<sup>st</sup> class), using a specifically sourced database to reduce the risk of non-delivery. The postcard provided an invitation to the in-person CODs as well as details of the online consultation page, overview/update of the project including site suitability and information promoting other contact methods.

Following the first round of consultation, Boralex increased the radius covered to 10km and sent a further postcard detailing changes to the project and the second round of

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CODs which would present those changes in March 2023. This list covered 1223 properties, and again the postcards were posted via Royal Mail (1<sup>st</sup> class).

#### 4.3 Freephone

The Freephone telephone number launched at that time for specific enquiries relating to the proposal continues to be in use (0800 980 4299), enabling residents to speak to members of the project team and receive additional information.

#### 4.4 Online Consultation Website

In January 2023 Boralex launched a new project website [www.lochtoftingallwindfarm.co.uk](http://www.lochtoftingallwindfarm.co.uk) to provide information for residents and their representatives about the proposal for a two-turbine plus battery storage energy scheme and allow them to give feedback by completing an online questionnaire or asking specific questions via [info@lochtoftingallwindfarm.co.uk](mailto:info@lochtoftingallwindfarm.co.uk) - the dedicated email facility.

The dedicated project consultation page provided:

- introduction to the consultation;
- information panels (**Appendix 4**);
- link to feedback form; and
- details of dedicated email address and freephone number.

#### 4.5 Social Media

Boralex used Facebook to promote the upcoming CODs, and the same promotion was posted on the Watten Community Facebook page (452 members). (**Appendix 6**)

#### 4.6 In-person Community Open Days

Two rounds of in-person CODs outlining the draft proposal and presenting the revised proposals were held. The first round on 31st January in Spittal Village Hall and 1st February in Watten Village Hall between 1.30pm and 7.30pm with follow up community open days held on 14th March in Spittal Village Hall (1.30pm – 7.00pm) and 15th March in Watten Village Hall (1.30pm – 6.30pm). Copies of the exhibition information panels can be found in **Appendix 4** and photographs taken at the exhibition in **Appendix 5**.

As well as being able to discuss the Proposed Development, alongside the wider issue of climate change, energy security etc., members of the development team were able to offer visitors the chance to view specific landscape and visual impact by utilising a 3D computer modeling programme able to generate views from any given view point, thus allowing residents to see just how the development of turbines and battery storage units would look from their own homes.

Feedback from the first round resulted in the removal of the two turbines from the proposal and increasing the battery storage slightly.

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### *Publicity*

Invitations to the public exhibitions were sent by postcard to all households within a 5/10km radius of the project, see **Appendix 3**.

In order to publicise the exhibition to the wider community, adverts were placed on Boralex and local community social media sites and shared with other relevant stakeholders, including the local Community Councils and local Members. See **Appendix 6**.

### *Media*

Press coverage of the first round of CODs was included in the local paper, the John O’Groat Journal along with paid advertisements for both rounds (see **Appendix 6**):

### *Attendance*

Based on the open day register, 34 people attended the first round of CODs over the two days, where they had the opportunity to inspect the draft proposal, discuss issues with the project team, provide feedback directly and complete a questionnaire (**Appendix 7**) and/or enquiry request form (**Appendix 8**) for return on the day or via FREEPOST.

35 people (some of whom had attended the first round) attended the second round of CODs where the revised proposals were presented.



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## 5. Consultation Feedback

Throughout the community consultation programme Boralex received qualitative and quantitative feedback and listed below is a summary of the key findings obtained and the subsequent changes made to the project.

### 5.1 Postcard

In addition to inviting recipients to the CODs, the postcard directed them to the dedicated consultation page on the project website and also provided a range of contact methods including Freepost, Freephone and email address.

The first-round postcard generated one enquiry (by email) from a local landowner prior to the first round of CODs regarding site access arrangements.

### 5.2 Online Consultation Website

The Loch Toftingall online consultation page has been live since January 2023, providing an overview of the project, and hosting an online consultation facility. To date, no online consultation feedback forms have been submitted.

### 5.3 Community Open Days

Discussion with visitors to the first round of CODs identified an overall view that while the two proposed turbines sat well with the existing Halsary windfarm, more turbines of any sort in this area were not acceptable from local residents' perspectives. This view was strengthened by the fact that the Halsary windfarm has suffered from regular curtailment due to lack of capacity on the grid network elsewhere.

Having taken on board the feedback received, a review of the project was undertaken and it was decided to remove the two turbines and replace them with further battery storage units. This change was then presented to the community at the second round of open days.

Open day opinion forms were completed by 7 attendees, 6 of whom live within 10km of the project.

5 of the opinion forms were completed at the events and two were returned via freepost following the first round of open days. These questionnaires are taken into account in the overall results of the public consultation exercise. Copies of all returned open day questionnaires can be found in **Appendix 9**.

All the completed forms provided the following results on whether or not respondents support the Proposed Development:

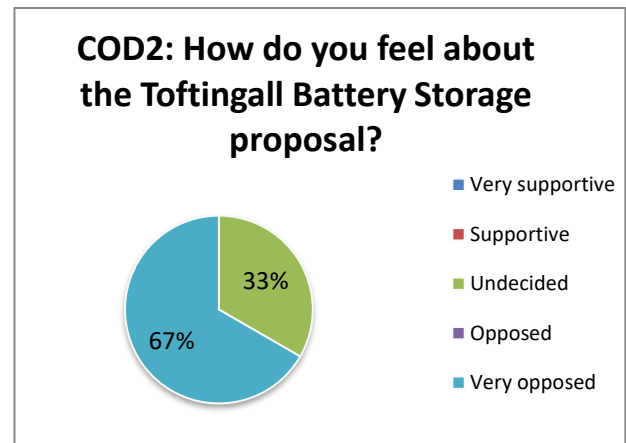
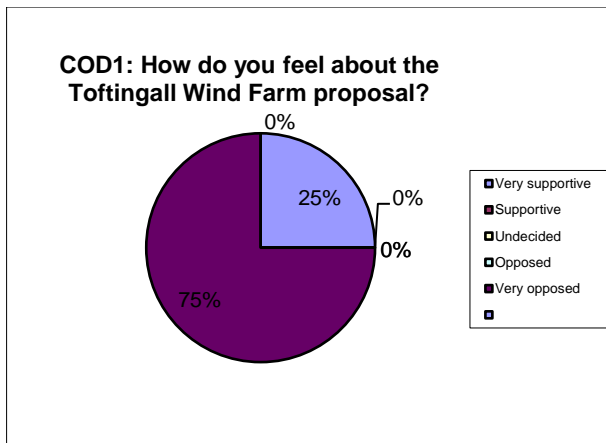
**First Round**

Very supportive	1	(25%)
Supportive	0	(0%)
Undecided	0	(0%)
Opposed	0	(0%)
Very opposed	3	(75%)
No comment	0	(0%)

**Second Round**

Very supportive	0	(0%)
Supportive	0	(0%)
Undecided	1	(33%)
Opposed	0	(0%)
Very opposed	2	(67%)
No comment	0	(0%)

**Total 7 (100%)**



**5.4 Issues**

Feedback questionnaires asked respondents if they had any specific issues or concerns about the proposal and a list of possible issues was provided. In addition, the overriding feeling was that the area in question was already at capacity with turbines and that while the project was well designed to fit with the neighbouring Halsary Wind Farm, they were still two too many, particularly when Halsary is so often constrained by grid issues elsewhere.

This feedback prompted a review of the project and resulted in the two turbines being replaced by additional battery storage, which was presented to the community at the second round of open days.

*Open day questionnaires*

In question 5a respondents of the open day questionnaire were informed that Boralex had conducted a range of surveys that assess the current situation on site and the potential impact of the Proposed Development, both in its original form and the revised proposal. Respondents were asked to indicate which of the following elements of the proposal they were interested in and would like to be kept updated about (note: total responses rather than individual respondees):

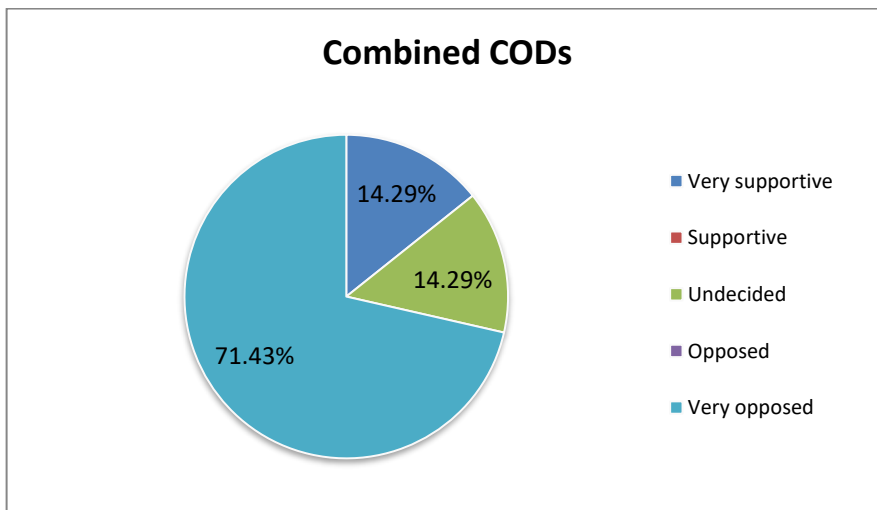
How the wind farm might look*	4	
Local wildlife	5	
Potential noise	3	
Tourism	3	
Electricity output	3	
Site traffic during construction	4	
Local archaeology	3	
Other (safety/peat)	3	*COD1 only

### 5.5 Summary of Feedback

Overall feedback for the Proposed Development, taking into account all consultation methods can be summarised as follows:

#### Proposed Development Overall Results

	Website	Exhibitions	Total	
Very Supportive	0	1	1	14.3%
Supportive	0	0	0	0%
Undecided	0	1	1	14.3%
Opposed	0	0	0	0%
Very Opposed	0	5	5	71.4%
No Comment	0	0	0	0%
<b>Total</b>	<b>0</b>	<b>7</b>	<b>7</b>	<b>100%</b>



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## 6. Response to Consultation Feedback

Further to the consultation process outlined in this statement, a number of activities have or are being undertaken in order to respond to feedback received. These are detailed as follows:

### *Letters*

Following the open days, individual letters (by email) were sent to those who raised issues or questions via the exhibition, online feedback forms or by email directly and this will continue throughout the planning process.

### *Web/email*

Everyone who submits a question or query either via the website questionnaire or by email direct will also be responded to electronically.

## 7. Future Consultation and Community Liaison

### *Next Steps – Pre and Post Submission*

Boralex is committed to the continued involvement of and consultation with the local community and other stakeholders throughout the planning process.

Even though the pre-application consultation has been completed, this does not mean that the consultation will end. Boralex is committed to further consultation during the planning determination period, ensuring that local residents and stakeholders continue to be involved in the process and are kept informed of the proposal's progress.

### *Newsletters*

Following the newsletter distributed in October 2021, a further newsletter encouraging feedback and directing comments to the appropriate planning body will be distributed following submission of the application has been submitted.

### *Stakeholder/Interest group briefings*

Members of the Highland Council engaged with the consultation process by email and members of surrounding Community Councils attended the open days.

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### *Media relations*

Media relations activity will be ongoing. Once the application has been submitted, a news release detailing the submitted proposal and consultation outcomes will be issued to the media. Boralex will respond to media enquiries and requests for information throughout the determination time period.

### *Ongoing response to queries*

Boralex will continue to respond to queries that are received via the various consultation channels i.e. Freephone telephone number, freepost address, dedicated email address, website and newsletter.

### *Community Liaison*

On submission of the application, Boralex will inform the appropriate community groups along with those individuals who have already engaged with Boralex and offer to attend future meetings in order to keep the community appraised of the project during development.