

**Proposed 100,000 Tonnes per annum Malt Production Facility
Land at Greens of Rothes, Rothes, Moray**

Pre-application Consultation Event - 1 July 2021: Summary of Responses

Total Number of Attendees: 11

Members of the Public - 9
Community Council – 1

COMMENTS RECEIVED	APPLICANT / AGENT REPOSESES
Consultation	
<p>Why was the public event not held at a public hall in Rothes of Aberlour?</p>	<p>The virtual consultation event was arranged in accordance with Scottish Government good practice guidelines. The details were set out in our Proposal of Application Notice (PAN) submission (14/5/21) and were approved by Moray Council (3/6/21). It is acknowledged that there are some disadvantages to the online consultation approach, however there are also some advantages.</p> <p>When the PAN was submitted to Moray Council in May Moray was still in Level 3 of the Coronavirus (COVID-19) protection levels.</p> <p>Simpsons are keen to meet face to face with the community and this will be arranged as soon as COVID restrictions allow. There will be plenty of time to have this dialogue during preparation of the Planning Permission in Principle application which could last up to 6 months.</p>

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	Following this opportunity will exist to input into the detailed planning application that comes thereafter.
Fishing in The Spey should be protected.	Agreed.
Environmental Impact Assessment (EIA)	
Will hard copies of Environmental Impact Assessment Report (EIAR) be available?	<p>Currently the EIAR has to be viewed online via the Council's planning portal only given restrictions and emergency planning legislation in The Town and Country Planning (Emergency Period and Extended Period) (Coronavirus) (Scotland) Regulations 2020.</p> <p>Moray Council Planning Department has confirmed that if these restrictions change they would expect hard copies to be available for the public to read.</p> <p>At this point in time the Council access points in Moray remain closed.</p>
Site Selection	
<p>Why Rothes?</p> <p>What was the site selection process?</p>	<p>To select a site for a Malt Process Plant there are 5 key requirements:</p> <p><i>Water</i> – a reliable source of potable water. Groundwater investigations indicate an available source. The site at Rothes will be designed to recycle about 60% of this demand.</p>

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<p>Were sites at Lossiemouth considered?</p>	<p><i>Point of Discharge</i> – The process water will be treated before being discharged to a suitable receptor. At Rothes the discharge quality will be controlled by a permit (controlled by SEPA) and the discharge will enter the Spey.</p> <p><i>Electrical Capacity</i> – A maltings has a large electrical load and the site provides options to connect to a local distribution network or indeed be provided directly from The CoRDe or other local renewable energy generators.</p> <p><i>Heat Capacity</i> – Gas is not directly available on the site in quantities to provide the full heat requirements however Simpsons has made a commitment to be Carbon Neutral by 2030. The heat required for processing malt will be sourced from CoRDe , by using a green electrical supply or other alternative technologies</p> <p><i>Space</i> – The site is sufficiently large enough to allow the construction of a 100,000 tonnes per annum malting, which is the size required to provide a sustainable malting plant sufficient for the customer demand in the area. The land is flat, has limited flood risk (that can be mitigated) and was identified by Moray Council in the 2015 Local Development Plan as a mixed-use development site and initially in the 2020 LDP as a site suitable for industrial development.</p> <p>In addition to the key requirements the site at Rothes provides:</p> <p><i>Access to Customers</i> – The site at Rothes will allow Simpsons to distribute malt to our existing customers without the need to travel far, most of the malt produced at Rothes will be delivered to customers within 10 miles of the site. This will reduce our present road miles per annum by > 1.3 million miles.</p>

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	<p>Sites at Elgin and Buckie have also been considered. Sites at Lossiemouth have not been considered due to unsuitability.</p> <p>The EIAR will include a chapter on the Alternative Sites.</p>
Construction	
How long will it take to construct the malting facility?	<p>2 years once full planning has been received and once customer supply agreements are in place.</p> <p>It is Simpsons intention to use local contractors to complete the construction of the site for all aspects of the process plant where it is possible to do so.</p>
Employment	
How many jobs will be created and what will the jobs be?	<p>It is anticipated that the Maltings staff will consist of 40 directly employed personnel. The skills required will be varied and typically a malting will require a mix of:</p> <ul style="list-style-type: none"> • 20 Operational staff who are responsible for the process and include a team of engineers. They will be required to work shifts as the site runs 24 hours per day 365 days a year.

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	<ul style="list-style-type: none"> • 20 Support Staff who will be required to run a laboratory, customer support, site administration, quality, safety and provide a transportation team to deliver to local customers these workers will be operating Mon-Fri normal office hours. <p>Simpsons are committed to developing their employees and will offer training and apprenticeships to maintain a local employment base for the future.</p>
Traffic and Transport	
<p>The Malting is going to increase traffic in town.</p> <p>As part of the joint community council there is a sub-group looking at the volume and speed of traffic.</p> <p>Accessibility is the major problem given residential streets (High St/New St).</p>	<p>The Malting is being designed to produce 100,000 tonne of malt per annum and this will be distributed to our customers within Speyside and nearby. There will be a redistribution of our current delivery fleet removing the need to travel from Berwick Upon Tweed and there is an almost 50/50 split of vehicles travelling North and West from the site and those that will need to travel South through Rothes. It is anticipated that a daily average of six deliveries to the South of Rothes will be required and these will be during normal working hours Monday to Friday. Most of the barley required for the site will be delivered from the sites located in Keith and Stracathro formerly owned by WN Lindsay, who Simpsons Malt acquired in February 2021 .</p> <p>A Traffic Risk Assessment is being carried out with Moray Council and WSP Transport Consultants. The assessment will assess the site in relation to traffic and transport matters for all modes of transport and will include an assessment of the potential impact of the proposed development on the local road network. This will include for example potential impacts of traffic (HGV) generation on the local road network and matters around road safety etc. Should the results of the assessment show that the proposed development has a significant adverse</p>

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	<p>impact on the operation of the road network, this would be appropriately mitigated against if required, with any measures agreed with the local authority.</p> <p>Simpsons are investigating an extension of the existing 30mph speed limit along the site frontage.</p> <p>The current proposals are for a simple priority junction arrangement. This would either be a single point of access or alternatively two simple priority junctions operating as an in / out arrangement. This will be assessed as part of the Transport Assessment, with the agreement agreed with Moray Council. Furthermore, as part of the design process road safety audits would be undertaken at the appropriate stages to ensure the design of the junction arrangement was designed to the appropriate standards and shown to operate in a safe and efficient manner.</p> <p>Simpsons are aware that there are already concerns regarding traffic using the main thoroughfare of Rothes and the comments raised at the consultation and posted on Facebook are noted. (Noise, Vibration, Speed, Congestion and Road Crossings) Simpsons have already asked for additional traffic and road safety assessments in conjunction with Moray Council and our transport consultant WSP. Simpsons will make any changes within their control to reduce traffic related issues discovered and will also support reasonable third party proposals that do not fall within their responsibility to effect. Simpsons Malt Ltd vehicles are all clearly marked with our company livery and drivers are already instructed to drive considerately. We always welcome any feedback regarding our driver's performance.</p>
Landscape and Visual Impact	

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<p>The site will be an eyesore.</p> <p>There will be a closed and industrial entrance to Rothes.</p> <p>Will there be more viewpoints shown on the website?</p> <p>Impact on view from the river for fishermen, for whom the setting forms an important part of the whole fishing experience.</p>	<p>As part of the planning process, we have employed landscape specialists to assess the visual impact of the proposed development from several viewpoints agreed with Moray Council.</p> <p>Six viewpoints have been selected to inform the Landscape and Visual Impact Assessment and are being agreed with Moray Council.</p> <ul style="list-style-type: none"> • Viewpoint 1 B9015 • Viewpoint 2 southwest of Crofts Farm • Viewpoint 3 Green Street (Core Path SP17) • Viewpoint 4 Greenfield lane • Viewpoint 5 Land street (Core Path SP17 & 18) • Viewpoint 6 Golf Course (Core Path SP01) <p>These visual interpretations will be used to determine how best to mitigate any impact and in fact to improve the visual impact on the approaches to Rothes. The site will be landscaped and planted to improve the outlook of those living close to the site and other areas will be developed to provide ecological habitats for a wide and varied species.</p> <p>The site layout has been designed to site taller structures further from the road to use perspective to reduce their visual impact and to ensure that noise levels at residences do not exceed the existing background noise level.</p>

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	<p>In response to the initial consultation and public comments on Facebook the flat storage sheds have been relocated further from the site boundary to reduce their impact and improve outlook from the cottages at the Western corner of the site.</p> <p>Options to maintain an outlook from the river in keeping with the current environment will be explored and solutions incorporated into the plan.</p>
Ecology	
Osprey are nesting at Delfur Farm	Our appointed ecological consultants are addressing birds in their ecological survey.
Cumulative Impact	
What will be the cumulative impact with CoRDE and existing distilleries?	The EIAR will address cumulative impact in a specific chapter.
Drainage	
Will there be effluent and where does it go?	The malting process starts by steeping the barley for two days. The water drained from the steeps is the primary process water that will be treated at our plant on site. The other wastewater stream on site is condensate from the germination and drying phases of the process (we will hope to reuse the collected condensate for cleaning). All process water will be treated using best available technology. 60% of the treated water will be cleaned

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	<p>sufficiently to allow its reuse within the malting process. The water discharge from our treatment plant will potentially receive a second treatment process such as a wetland or reedbed solution to ensure that the ecological environment at the discharge is maintained or improved by our site discharge. Treated effluent will eventually flow into the Spey and all processes will be scrutinised and agreed by SEPA. Simpsons Malt have extensive experience of operating water treatment processes, including being the first to reuse treated water in malting and discharging into Sites of Special Scientific Interest (SSSIs)</p> <p>Waste from the staff welfare facilities will be treated separately using suitable technology agreed with SEPA.</p> <p>Surface water run-off will be managed on site and designed to contain flood water using a Sustainable Drainage System (SuDS). This will also be scrutinised and agreed with SEPA.</p>
Energy	
<p>Will you be taking power from CoRDE as their output is not reliable?</p> <p>Do your lorries run on HVO and will there be a manufacturing of HVO?</p>	<p>Electricity direct from CoRDE is being considered, along with other local generators as well as a connection from the SSE grid.</p> <p>Our aim is to be carbon neutral by 2030, so the design will be guided by this ambition.</p> <p>Our transport fleet uses HVO and a refuelling facility will be available on site, we will not be producing/manufacturing HVO on site.</p>

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Noise	
What will be the noise impact?	<p>Moray Council approved the Scope of the Noise Assessment methodology.</p> <p>The detailed assessment compares the proposal against good baseline data (CoRDE).</p> <p>Currently the design is being finalised with the aim is to make noise impacts negligible and ideally neutral, against current background noise levels.</p> <p>Moray Council will agree the design and noise assessment to ensure regulations are met.</p> <p><u>Mitigation</u> The site layout has been designed to locate noisy plant away from residential receptors. Some site plan changes have already been made to minimise sound migration beyond the site boundary. As the design continues to evolve, we will continue to model any impacts and design measures to ensure that no nuisance is caused to residents.</p> <p>The Simpsons site at Berwick operates under a licence managed by the Environment Agency and we have had 10 + years of noise abatement techniques within the malting process. Our existing noise management plan ensures that we use of experience of where noise is created within our process and how to ensure it does not impact our neighbours. Accordingly, sound attenuation measures introduced at Berwick will be incorporated within the Rothes design from the beginning.</p>
Odour	
Will the site smell?	<p>Making malt creates odours during only a few hours of the germinating process and a few hours of the drying process, these smells are found to be pleasant to most people. However, as the sources of these odours will be positioned away from the site boundary it is highly</p>

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	<p>unlikely that anyone except employees or visitors will be at a point on site where they will be able to experience this smell.</p> <p>Simpsons will not be producing either Peated Malt or Roasted Malt at Rothes, processes that can create odour and currently take place at Berwick and Tivetshall, Norfolk respectively. The company has invested heavily to undertake these processes at these sites and has no intention of moving these activities</p> <p>The Odour Assessment will evaluate the risk of potential odour impacts during operation and identify any requirement for mitigation.</p> <p>Consideration will also be made to the 'Odour guidance 2010' produced by SEPA throughout the assessment.</p> <p>Emissions, including odour, will be regulated by SEPA under the Pollution, Prevention and Control (PPC) regulations.</p>