

**24/00155/PPDM – BATTERY POINT ENERGY STORAGE PARK, NEWTON STREET,
STORNOWAY, ISLE OF LEWIS**

LIST OF REPRESENTATIONS RECEIVED

NO.	DATE RECEIVED	COMMENTS
1	27.05.2024	<p>Location</p> <p>In paragraph 2.1 of the Design and Access statement the applicant states their reason for selecting this location, and they conclude with the statement – ‘It was the only identifiable site with these attributes’.</p> <p>This statement is true only because, apart from land belonging to SSE, it is the only land available that is adjacent to the power station.</p> <p>It is however not true that the development must be adjacent to the power station. At a meeting held in Newton Community rooms on Wednesday 15th May, Calum Macdonald, Point and Sandwick CEO, stated that the site was chosen because SSE said, ‘the closer to the power station the better’. My understanding is that access to the main grid cable is the only essential.</p> <p>My objection to this location is not so much a case of ‘Not in My Back Yard’ but more ‘My Back Yard Is Full, Please Don’t Fill My Front Yard’.</p> <p>If you take this area of Stornoway South, surrounded by James St, Sandwick Rd, Seaforth Rd, Seaview Terrace and Newton Street, you will find that it is already completely saturated with Industrial and commercial premises. I think it’s fair to say that this community already contributes more than its fair share to the benefit of the wider town and island.</p> <p>This site, described by the applicant as an area of ‘empty grassland’ is the only remaining area of accessible green space in this community and I believe it would be better used to provide an enhanced social and community experience and to encourage and enhance the health and wellbeing for residents and the wider community. I go into this in more detail in the section titled ‘Alternative Usage’.</p> <p>This land is surrounded by residential homes (Newton St, Seaview Terrace, Battery Rd, Inaclete Rd, Cannery Rd, Millar Rd, Bulnacraig St) and not situated in an industrial area as suggested by the applicant. The Power Station is adjacent to some of the houses, but the area is predominantly residential.</p>

Emissions/Environmental Impact

The diesel power station in Stornoway only operates when the connection to the grid fails or is interrupted for maintenance.

Planned maintenance usually takes place over a two-week period in the summer months but can on occasion of major work be extended slightly. It will also be operational on the rare occasion of unplanned supply disruption, usually because of poor weather.

The Battery Storage Facility may slightly reduce output, but the power station will still have to be running at all times when connection to the grid is unavailable.

The applicant uses the ability to limit harmful emissions as one of the main factors for approving the application. To ascertain whether this development would have an overall positive impact on emissions I asked Calum Macdonald if he could tell me the carbon footprint of this development from start to finish (Mining of minerals, production of batteries and associated machinery, transportation, decommissioning and recycling etc), Mr Macdonald was unable or unwilling to answer.

I carried out some research myself but could only find references to EV batteries which are much smaller than those required in this project but use the same minerals etc.

producing one tonne of lithium (enough for ~100 car batteries) requires approximately 2 million tonnes of water. (Earth.org)

The carbon dioxide and other greenhouse emissions that come with the process of lithium mining, extraction and overall production are worse for the climate than the production of fossil fuel-powered vehicles.30 Oct 2023

To manufacture each EV battery, you must process 11 ton of brine for the lithium 13 ton of ore for the cobalt 2 ton of ore for the nickel, 11 ton of ore for copper. To achieve this amount of ore requires the removal of 223 ton of the earth's crust. (VitalMX)

The environmental fallout from lithium mining is clear and far-reaching. Massive quantities of fresh water, classified as a precious resource in these arid regions, are diverted for lithium mining operations, fuelling the salt flats brine. (Mining Technology.com)

lithium extraction inevitably harms the soil and also causes air contamination."20 Mar 2024 – Friends of the earth

	<p>The above statistics relate to EV batteries, those proposed for this project will be much larger so the quantities described will be greater and 144 are required.</p> <p>The applicant claims that the battery storage facility has a lifespan of 25 years. Because the batteries only have a life of 8 – 10 years they will have to be replaced 3 times in the 25-year period so the emissions for the lifespan of the proposed project will have to be multiplied by 3.</p> <p>Given the limited time that the power station runs each year and the serious quantity of emissions produced in the development of this project it is highly questionable if there will be any reduction in harmful emissions.</p> <p>It appears to me that the main purpose of this development is to maximise income for the applicant. They will be able to store their own generated power when the price is cheaper and sell it to the grid at times of greater demand when the price is higher. At times of no or little wind they could import and store electricity from the grid and sell it back at a higher price.</p> <p>I have no objection to the applicant doing this; indeed it makes commercial sense, however I do object to it being dressed up as some sort of environmental panacea considering the detrimental impact it will have to this area of town and its residents.</p> <p>Fire Safety</p> <p><i>‘The installation of BESS systems both in the UK and around the globe is increasing at an exponential rate. A number of high-profile incidents have taken place and learning from these incidents continues to emerge.’</i></p> <p>The above quotation is taken from the first paragraph of a document produced by the National Fire Chiefs Council entitled ‘Grid Scale Battery Energy Storage System planning – Guidance for FRS’</p> <p>This document has been compiled to include evidence-based guidance drawing on lessons learned from previous incidents. This document should be read by anyone involved in planning applications for these systems and I have attached a copy for your edification.</p> <p>While they acknowledge that it is not a statutory requirement they do encourage ‘early engagement with the local FRS, continuing</p>
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	<p>throughout the planning process'. There is no evidence that the applicant has engaged with FRS locally.</p> <p>I do not intend to discuss everything within the document, much of it can be addressed after the planning application process, but I would like to raise a few points that would be prudent to consider during the planning process.</p> <p>At the meeting of 15th May, the risk of fire was raised by some attendees, Calum Macdonald responded by indicating that this has been addressed by utilising a gas suppression system. The Suppression Systems section of this document on pages 5 and 6, states that this type of suppressant is not suitable and provides reasoning for that conclusion.</p> <p>The section titled Site Access (page 7) states, 'At least 2 separate access points to the site to account for opposite wind conditions/direction'.</p> <p>While the facility has 2 separate access points on the site boundary, they can only be accessed by the road into Goat Island so would not be suitable for FRS assets.</p> <p>On page 7 the section Access between BESS units and unit spacing they state, 'A standard minimum spacing between units of 6 metres is suggested unless suitable design features can be introduced to reduce that spacing. If reducing distances a clear, evidence based, case for the reduction should be shown'.</p> <p>It's not clear from the application documents if this spacing has been implemented.</p> <p>On page 7 the section Distance from BESS units to occupied buildings & site boundaries states 'Proposed distances should take into account risk and mitigation factors. However, an initial minimum distance of 25 metres is proposed prior to any mitigation such as blast walls.'</p> <p>Again, it is difficult to ascertain if this guidance has been implemented with regard to the Coastguard building, which is occupied permanently.</p> <p>Alternative Use</p> <p>I do not dispute the applicant's assertion that this land was once used to dump building material, however I have lived here for 56 years</p>
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	<p>and have no memory of it being anything other than a grass covered wasteland.</p> <p>I was on the local Residents Association committee for many years, and we did look into using this land for the community, however we were led to believe that it couldn't be used for anything because it was polluted by seepage from the old power station oil storage tanks. This application would suggest that is no longer the case.</p> <p>While the neighbouring properties, occupied by Scottish Water and HM Coastguard are well maintained and have their grass cut regularly, the current owner of the proposed site has always neglected it and recently started dumping fishing gear there.</p> <p>Despite its appearance it has been used on many occasions by the emergency services to hold their 'Open Days'</p> <p>This is the ideal location for this event with displays by RNLI taking place in the Newton Basin, Helicopter rescue displays to the rear of the Coastguard Station and vehicles from all the services, including the SAR helicopter parked in the grassed area.</p> <p>These events are very successful and provide an excellent public relations opportunity for these organisations. Organisations participating in these events include Police, FRS, Mountain Rescue, Ambulance Service, Airport Fire Service, Coastguard, RNLI, Coastguard Tug and SAR Helicopter. The last time this was held was in 2022, it had to be scaled down a bit after COVID but was still very well attended.</p> <p>If this application goes ahead this event will be lost to the island, this being the ideal location.</p> <p>In recent times the area around the proposed site has become very popular with locals and visitors alike for exercising of different types.</p> <p>The section of coastal path that runs along the perimeter of the Coastguard station and the power station was upgraded a few years ago and has led to a much increased usage by walkers, cyclists and runners. I use it myself every day and even in Winter it is unusual not to meet several other users.</p> <p>The path is part of the Wider Path Network and people can now use this network of coastal paths to travel from town to the lolaire Monument. The opening of the path from Lower Sandwick to the monument has led to a further increase in users and I am often stopped by visitors checking if they are going in the right direction.</p>
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		<p>These types of activity must be encouraged in an effort to increase the health, both physical and mental of everyone in our communities. If the community were able to take on ownership of this site, part of it could be used to provide a seated rest area that would encourage the less able-bodied, elderly, families with prams etc to participate in these activities.</p> <p>The completion of the Newton Marina and the new Deep-Water Port has also led to a much greater footfall on the Goat Island Causeway with people coming to view and take pictures of the various vessels as they arrive and depart. This seated area would benefit this activity and would be an excellent outdoor meeting place for locals and others providing a valuable social asset.</p> <p>The area of the site closest to the Coastguard station could be retained as a field enabling the continuation of the Emergency Service open days, discussed earlier, and would provide an area for the community to hold Fun Days and other outdoor activities. When not used for these purposes, it could be used as a general recreational facility where young and old could partake in various activities. I believe such a facility is not only welcome but vital for this community and its people to flourish.</p> <p>There are many houses in the Seaview Terrace, Battery Rd, Cannery Rd area that have no gardens or only very small drying greens. The Newton Community Association have for some time being looking for possible places to erect community polytunnels. This area of land could be used for this purpose. Such a facility would not only produce cheap, healthy food for our children but could also be used to provide people with valuable skills in growing their own produce.</p> <p>I have provided three possible uses for this site that would enhance the area and the Health, Wellbeing and Social experience for both residents and visitors alike. This is the only area of ground remaining in this community that could be utilised in this way, please consider this when making your decision.</p>
1A	21.06.2024	<p>Additional Comments by previous contributor</p> <p>Location</p> <p>It has been brought to my attention...[by an interested third party]... that he would be very concerned if this proposed development was granted permission in this location.</p>

		<p>The safety of the current technology used in these Battery Electric Storage Systems is at best highly questionable with several high-profile incidents already recorded and reported on.</p> <p>If a fire was to occur in this location, then there would have to be an exclusion zone set up which would prevent SSEN employees from accessing the power station preventing any energy from being generated there.</p> <p>It would also mean that the Coastguard Station would have to be vacated putting lives at risk.</p> <p>Nobody would be allowed access to Macduff's factory, Macmillan engineering, Coastal Workboats, The Slipway or Marina.</p> <p>Rather than strengthening the resilience of the Island's power supply in the event of disconnection from the main grid, siting the BESS in this location could have exactly the opposite effect and leave the island with no electricity supply whatsoever for an extended period of time.</p>
2	27.05.2024	<p>I write with regard to the proposed Battery Point Energy Storage Park (24/00155/PPDM) at Newton, Stornoway.</p> <p>As a Newton resident since February 2022 I was very surprised to only be made aware of this major development when a leaflet from the Newton Community Association was received on 12 May.</p> <p>I apologise for the rushed nature of this response. As detailed below, the process and dates for feedback and objections has been confusing.</p> <p>I strongly object to the proposal for a number of reason:</p> <p>Inadequate community consultation.</p> <p>The letter dated 22 October 2022 from Morag Ferguson at CNES details 'required consultation.'</p> <p>Also, Section 1.4 of the Pre-Application Consultation (PAC) report states "Pre-application consultation with the community should inform communities and empower them to contribute to emerging development proposals. Consultation can help address community issues, mitigate negative impacts and address misunderstandings, resulting in a better-quality planning application. "</p> <p>In my professional and personal opinion, the consultation activities, as detailed in the Pre-Application Consultation (PAC) report and the manner in which they were advertised have not met the required definition of The Town and Country Planning</p>

(Development Management Procedure) (Scotland) Regulations 2013.

Whilst some communication and engagement activities were carried out, the manner in which these were executed and advertised would seem to indicate at best incompetence and at worse, a deliberate strategy to minimise the opportunity for the affected local community to engage.

The ineffectiveness to date is clearly demonstrated by the relatively high number (approximately 20) of local residents who attended the 15 May 2024 meeting as opposed to the number who attended, a poorly advertised, meeting in November 2022 (2 according to the consultation report). This clearly demonstrates the consultation gap and communication void that has developed around this proposal.

At the 15 May meeting, which was advertised by a good old-fashioned letterbox drop, the majority of vocal attendees spoke out against the proposal. These opinions, which clearly existed previously, are not reflected or captured in the consultation report.

Specifically lacking in effectiveness are the placing of notices on the Point and Sandwick Bay Trust social media channels (Twitter, LinkedIn and Facebook). These are not relevant or appropriate for two reasons:

- 1) This development is not in the Point and Sandwick Bay Trust area and as such very few, if any, Newton residents would have reason to be 'following' these channels. The inclusion of posts on Twitter and LinkedIn as examples of 'community consultation' is almost laughable - except this situation is not funny.
- 2) It is not best practice to rely on social media as a communication channel, even for followers, as the loading of notices into feeds is not guaranteed.
- 3) Many Newton residents are not online and do not use social media channels at all.

I am a regular user of social media and receive feeds from the two, now three, established Facebook groups for Stornoway/Island events. These were not used and as detailed above, the first knowledge I had, as a resident, was a leaflet through my letter week beginning 12 May 2024, after the planning application had been submitted.

Surprisingly, there was no publicity on the relevant Newton Community social media pages. Advertisements on Isles FM are not

	<p>useful as this station has very low, almost negligible, audience numbers.</p> <p>The 21 November 2022 event was poorly advertised. An event at which there were more project representatives than members of the public is clearly not effective consultation. As mentioned, please note the much higher attendees at the 15 May 2024 meeting.</p> <p>The summary of the consultation event of 15 December 2022, as detailed in the Pre-Application Consultation (PAC) report, is slanted and unrepresentative of the discussion that took place. At the recent meeting it was noted that Mr MacDonald had publicly stated at the 15 Dec meeting that 'if there were objections it would not go ahead'. When challenged he clarified this to mean '<i>if the majority objected</i>'.</p> <p>There was no communication with residents until a notice was posted through my letterbox in the week beginning 12 May informing me of a community meeting on May 15. This meeting was called after a resident requested a 'community meeting' to gather the community response. What transpired was a presentation from the Point and Sandwick Bay Trust on the merits of the plan not a community meeting.</p> <p>At the above meeting, there were 7 people raising objections to the development. No minutes were taken from the meeting. Objections were; safety, location breaching guidelines on the situation of battery plants with regard to prevailing wind and residential development, aesthetic impact, lack of consultation with residents, lack of consultation with Fire Services, suitability of location in terms of proximity to the power station, community benefits and future proofing.</p> <p>Consultation fails to meet its purpose</p> <p>The stated purpose of pre-application consultation is 'to improve the quality of applications, mitigate negative impacts where possible, address misunderstandings, and air and deal with any community issues that can be tackled.'</p> <p>To date these requirements have not been met:</p> <p>The discussion at the 15 May 2024 meeting demonstrated an outstanding requirement to;</p> <p>Mitigate negative impacts - noise, visual amenity, location and construction.</p> <p>Address misunderstandings - fire risk, input/consultation with Fire Service, location of the facility in relation to residential developments and the prevailing wind.</p>
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	<p>Community issues - lack of effective community consultation, the option to locate the facility on land even closer to the power station and potential community benefit.</p> <p>Other issues relating to inadequate consultation</p> <p>The date for the close of objections was confusing with multiple dates being offered by both the Newton Trust staff and the Point and Sandwick Bay Trust at the 15 May meeting, including the offering of an 'extension' if required.</p> <p>After the meeting I emailed Point and Sandwick Bay Trust and asked for a contact as I had some questions. No response was received.</p> <p>Late last week after asking for minutes from the 15 May community meeting (none were taken) I was directed to the Greenspan agency. That is too late to provide any meaningful engagement.</p> <p>I note from the 31 October 2022 letter sent by CNES, it is stated that a planning application must be received within 18 months of the Proposal of Application Notice. Has that deadline been met?</p> <p>I worked for a number of years in New Zealand as a communications consultant and led the stakeholder engagement and communications on a number of large infrastructure projects. The planning regulations and their requirement for true 'consultation' are similar in both countries.</p> <p>Effective and robust community engagement, as defined by Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. would have looked like:</p> <ol style="list-style-type: none">1. A press release and follow up article(s) in the Stornoway Gazette - on more than one occasion over the 18 month period from October 2022 to May 2024..2. For a development classed as 'major' a permanent display in the Newton Community Centre with information on the project and representatives available at a number of different times e.g. Saturday morning, daytime and evening, and on a number of days, e.g. once per month, to ensure that people with differing commitments can attend at a time that suits.3. Notices/information on the high traffic Lewis/Stornoway facebook pages.4. Notice/discussion on local BBC radio station - on more than one occasion over the 18 month period from October 2022 to May 2024.5. Notice/discussion on local Gaelic news and current affairs programmes - on more than one occasion over the 18 month period from October 2022 to May 2024.
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		<p>6. Letterbox drop to inform residents, not on social media/online, on a number of occasions over the 18 month period.</p> <p>In summary the consultation has been, at best inadequate and at worse, deliberately designed to present a falsely positive view of community feedback and thwart true community consultation.</p> <p>Taking the above into consideration, planning permission should be declined.</p>
3	28.05.2024	<p>We strongly object to the above Planning Application Proposal on the following grounds.</p> <p>Safety Aspect – Fires at similar sites to this have been well documented. Eg. Arizona and Liverpool BESS. If a Thermal Runway/Fire/Explosion incident occurs the Toxic Plume Smoke/Toxic Gasses would be detrimental to health due to the close proximity to Residential Housing, bearing in mind the prevailing weather conditions are Southerly/South-Westerly on this island. The National Fire Chief Council have advised BESS should be located upwind where possible. The location is also entirely unsuitable due to there being only one access road to the proposed site.</p> <p>Human Impact – An incident at this development could hamper immediate life-saving operations in the surrounding area, one of the nearest defibrillators is situated inside the Coastguard Station.</p> <p>Visual Impact – The proposed height of the fencing and the acoustics barrier is going to be quite intrusive on what is currently an open viewpoint. There are a significant number of properties located close to the development which will adversely impacted by the proposed visual appearance of this site. The public footpath is regularly used and having this development will be a blot on the landscape.</p> <p>Community Wealth – This development will not directly benefit the residents of Newton Ward or the users of Newton Basin Marina/Goat Island facilities. This will not provide any long-term employment opportunities which does not support the Sustainable Population Plan or encourage people or tourists to the area.</p> <p>The ground available could be better utilised for the Health and Well-being of the Newton Ward Residents as this is the only significant green space left in the area. We would fully support additional car-parking space be made available to the Coastguard.</p> <p>This kind of development should not be sited anywhere near a residential area.</p>
4	05.07.2024	<p>Stornoway Community Council considered this major planning proposal at its meeting of Thursday 27 June 2024.</p>

	<p>Stornoway Community Council became established part-way through the planning process for this project. This resulted in the Community Council only being given two weeks to consider the project, starting on Monday 24 June. It was not thought realistic in this limited timeframe to carry out the thorough community consultation which such a major project deserved. This should naturally include a full opportunity for Point & Sandwick Trust (PST) to present its case to the Community Council. If we had invited PST to our 27 June meeting, they would have had barely three days notice, which would have been unreasonable.</p> <p>It was agreed that it had been sensible for CNES to treat this complicated £14 million Battery Energy Storage System (BESS) project as a 'major development', despite the relatively small area involved.</p> <p>The Community Council accepted that PST's proposal for a BESS at Newton could potentially generate significant profits for PST and other community windfarms, if a facility was created to allow the variable energy flows from windfarms to be utilised when the existing diesel-fired Power Station is in operation. It was also accepted that the BESS would allow power to be restored almost instantaneously to the island when the grid suffers an outage, instead of having parts of the island wait up to two hours for the existing diesel-fired generators to come into operation. The offer of community benefit was understood to be modest, only £5,000 a year to the Newton Ward Community Association and the possibility to apply to PST for grants. It was noted that a number of Newton residents had expressed concerns about the safety of the proposed BESS at a consultation meeting held in the Newton Ward Community Rooms on 15 May 2024. It was understood that none of the approximately fifteen Newton residents present at that meeting expressed support for the project. The concerns raised at that meeting included mention of the fire at a BESS in Liverpool in September 2020. Curiously, no minute seems to have been taken of that meeting.</p> <p>Online research uncovered the Significant Incident Report by Merseyside Fire & Rescue Service (attached). On 15 September 2020, firefighters had arrived to find that a 'Thermal Runaway' (an internal chemical reaction) had occurred within the electrical batteries, with an explosion so severe that a container door was blown six metres. The fire took over fifty hours to be extinguished. While very large quantities of water were used, fortunately the geography of the site was such that while the firefighting water run-off would inevitably contain acid from the batteries, there was a vast gravel run-off under the BESS, which had a fine coating of cement/lime, with the result that the acid contamination was neutralised. Housing seems to have been at some distance and the firefighters assessed that the plume of smoke with toxic</p>
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	<p>contaminants required advice to residents to close windows and doors.</p> <p>By comparison, Newton is a heavily built-up area, with residential buildings only a matter of yards from the proposed BESS. If that were to go on fire, there was a strong possibility that toxic smoke would be blown towards nearby houses by the prevailing wind. Also there is a risk of explosions carrying debris. As the proposed BESS is in a small area very close to the harbour, and since the experience of the Liverpool incident shows that significant quantities of water would be required to extinguish any fire, it is very likely as a result that a substantial amount of poisonous liquids would flow from the BESS into the harbour, killing any wildlife in their way. In short, any significant fire at the BESS will probably be a serious risk to human life and an environmental catastrophe.</p> <p>Also attached is the National Fire Chiefs Council document - "Grid Scale Battery Energy Storage System planning – Guidance for FRS". Amongst much useful guidance, the recommendation is that prevailing wind direction should be taken into account at the project design stage. The prevailing wind direction at the Battery is from the South West, meaning that in the event of a fire, the wind would most likely take the smoke directly across into nearby houses. Also the recommendation is that there should be at least two separate access points for Fire & Rescue Services vehicles to the site to account for opposite wind conditions/direction. It does not immediately seem that the BESS Newton site complies with this recommendation.</p> <p>It was further noted that on Sunday 23 June 2024 another serious fire broke out at an Electric Battery Recycling facility in Linwood, near Paisley. This resulted in residents being asked to stay inside their houses until the toxic smoke dissipated.</p> <p>Stornoway Community Council is well aware that Newton, in addition to being heavily built-up, has the Gas Works near Seaforth Road and the Oil Depot near Tesco's – both developments that would never be permitted now. Significantly, CNES has a definite plan, once offshore windfarm developments come on stream, that a facility producing green hydrogen shall be established near Arnish, and that Stornoway's small mains gas network will be converted to be run on hydrogen, allowing the closure of the existing gas works. Establishing a new, risky, development at Newton would seem to run counter to the stated CNES intention to move potentially dangerous facilities away from residential areas.</p> <p>It was noted that the 200-year old retaining wall at Newton Street, built on shingle, was in no condition to take heavy traffic. Also that</p>
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	<p>Goat Island itself is a major industrial estate, with hundreds of jobs in a seafood facility and at the shipworks there. And that already vehicles regularly have to queue up to access Goat Island, making the impact of construction works problematic.</p> <p>One of our members, who had been unable to attend this meeting on 27 June 2024, had asked that two questions be discussed – “Why is it PST making the application not SSE given that the new plant will be directly linked to the SSE power station at the Battery?” and “Why does the battery plant have to be placed here, immediately adjacent to Newton Str and so many houses, given the potential fire risk?” On the first question, it was noted that SSE itself has considerable expertise in BESS and is building two massive 250 MW BESS facilities in England. It was considered unlikely that we would get an answer from SSE, who may well claim ‘commercial confidentiality’. As to the second, it was understood that the current connections from windfarms run to the current small interconnector at Arnish and not to the Battery power station. Therefore it is unclear how the PST BESS facility could moderate the varying power flows from windfarms unless some substantial cabling was run from Arnish to the Battery. In turn, this begs the question as to why the BESS is not to be situated at Arnish. From PST Minutes, it seems this was considered at one point – these refer to abortive discussions with a local landowner there.</p> <p>One of our members has questioned whether the Community Council had a mandate to recommend that CNES should refuse planning permission. In a straw poll, they had canvassed 28 people, 10 of whom came from Newton. Five were opposed, 8 in favour, 6 undecided and 9 didn’t care. That is, opinion in Stornoway about the project is not certain.</p> <p>Several of our members have expressed reservations regarding PST’s public engagement strategy. These include PST’s failure to respond to requests for information through their web-based form (the PST website does not immediately seem to have a generic email address through which members of the public could contact them). As regards PST’s two public consultations in 2022, it seems PST’s agent, Greenspan, did not leaflet the areas of Newton closest to the development (Newton Street, Seaview Terrace, Seaforth Road, Millar Road, Battery Park Road, Builnacraig Street, etc).</p> <p>Since the Stornoway Community Council Meeting of Thursday 27 June 2024, it has transpired that PST did not organise the meeting held at Newton Ward Community Rooms on 15 May 2024. This meeting was in fact organised by Newton Ward Community Association at the request of a local resident who was concerned</p>
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		<p>about the proposal. Leaflets were distributed in Newton by Community Development Workers. Then PST arrived at the meeting with prepared documentation to present their case. The key point is that for some Newton residents, the leaflet for the 15 May meeting was the first they had ever heard of the project.</p> <p>From the point of fairness, since the Community Council has not had the opportunity to question PST on the various troubling issues which our discussion had highlighted, on balance it was not thought reasonable at this time to formally recommend outright that CNES should refuse planning permission for the project, despite the obvious valid safety concerns.</p> <p>Accordingly Stornoway Community Council would respectfully recommend to CNES –</p> <p>That the planning period should be extended to allow Stornoway Community Council to carry out a full public consultation, and to give PST the opportunity to address the various concerns which have emerged.</p> <p>That CNES should give serious consideration to asking PST to locate the BESS elsewhere, perhaps at Arnish.</p> <p>Regardless of the final location, it would be prudent for Planning Permission only to be granted after a comprehensive risk assessment by the Scottish Fire & Rescue Service – this should be by the SFRS Head Office, since it is not realistic to expect that the local branch would have the expert knowledge required. With the requirement that PST should implement any mitigation measures such as blast walls which the risk assessment may recommend.</p> <p>Finally, if planning permission is given for the Newton site, a comprehensive construction traffic flow plan should be agreed with PST, to avoid damage to the Newton Street road/wall and to minimise disruption to the businesses operating from Goat Island.</p>
04A	07.10.2024	<p>Additional comments from previous contributor</p> <p>Stornoway Community Council would like to formally object to Point & Sandwick Trust’s proposed development at Newton. While we had expressed serious reservations about this project in our representation to the Comhairle in July, we had not then had the opportunity to meet with Point & Sandwick and discuss the project.</p> <p>Now that we have met with the developer, this has only confirmed our thoughts that Newton is entirely the wrong location for a scheme of this kind. We accept that Lithium-ion Battery Energy Storage</p>

	<p>Systems (BESS) rarely go on fire, but we also recognize that if they do, the consequences are potentially catastrophic. The proposed site is far too close to the nearby housing – there is simply no margin for error if something goes wrong.</p> <p>With apologies for stating the obvious, considering the massive industrial developments planned for Arnish Moor – the giant SSEN HVDC Converter Station, the substantial Spiorad na Mara Grid Substation, and in due course the Grid Substation for the Magnora windfarm, plus perhaps later on a Hydrogen Hub - the industrial sector of Stornoway will soon be near Arnish, not in its traditional setting of Newton. If Point & Sandwick were to situate their BESS near the existing SSE Converter Station at Arnish Road End, the logic of this would be irrefutable.</p> <p>In saying all this, we acknowledge the imagination and courage of Point & Sandwick Trust in daring to venture into the complex business of energy arbitrage, for which the BESS was to be used. We are also grateful to them for their courtesy in meeting with us recently.</p> <p>However, this meeting and the additional explanations provided by Point & Sandwick Trust only highlighted the unsuitability of the Newton site for the BESS. In addition to being the wrong location, it has also become increasingly apparent that the Newton site is simply too small for a development of this kind.</p> <p>In addition, our own online researches found this guidance from the Department for Energy Security & Net Zero - https://www.gov.uk/government/publications/grid-scale-electrical-energy-storage-systems-health-and-safety/health-and-safety-in-grid-scale-electrical-energy-storage-systems-accessible-webpage</p> <p>We would make the following specific points -</p> <ol style="list-style-type: none">1. It is not clear that the applicant has engaged with the local Fire & Rescue Service from an early stage as per best practice.2. The applicant has failed to identify new fire hydrant sites within the site. Their safety statement identifies fire hydrants 140m as the closest and the next closest as 176 metres. If this application were to be approved, we believe it would be advisable that the applicant pay for a fire hydrant to be located much closer to the site, as a planning condition.3. The applicant has failed to identify the type of battery chemistry that will be used. This means that Stornoway Community Council and the Fire & Rescue Service do not have access to design
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		<p>statements showing how the batteries would react in a catastrophic event. As per draft guidance this is essential.</p> <p>4. As per draft guidance the applicant has failed to identify sensitive receptors within 1km of the site that may affect emergency planning.</p> <p>5. The applicant has failed to identify the prevailing wind direction as per draft guidance.</p> <p>5. The applicant has identified two entry routes for the fire service, but they are both from the north. In Figure 4, “Firefighting Approach Plan” on page 11 of the "Battery Health and Safety Statement". Point & Sandwick Trust claims that an alternative access route (shown in Green in this diagram) could serve as an adequate emergency access alternative to the Primary Road Access (shown in yellow). In reality given that the prevailing wind in Newton is understood to be from the South-East, in the event of a serious fire the wind could easily prevent access by this route. Whereas the National Fire Chiefs Council document “Grid Scale Battery Energy Storage System Planning – Guidance for FRS”, which has already been supplied to the Comhairle as part of our July representation, recommends on page 7 that there should be at least two separate access points to the site to allow for opposite wind conditions/directions. And in any event SSE for very good reasons of site security, has to keep the gate access from Newton Street securely locked.</p> <p>6. The applicant has failed to identify how long a battery would burn and what impact this would cause.</p> <p>7. The applicant has failed to identify alternative sites. It is clear that a site near the SSE Converter Station at Arnish Road End did come into consideration early on, however the applicant has claimed that only the Newton Battery is optimal, Our concern is that Point & Sandwick Trust is asking for Planning Permission somewhat speculatively. Without the necessary information they might be granted Planning Permission and then retrospectively choose an option that is more harmful.</p> <p>Ultimately, the impression given is that Point & Sandwick Trust is trying to shoehorn a substantial £14 million BESS development into a site for which it is manifestly unsuitable.</p> <p>We should also mention that those of the Community Council members who stay in Newton continue to receive representations from their neighbours which can be summarized as being extremely averse to this development.</p>
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		Without wishing to reiterate all the concerns detailed in our previous submissions, we would conclude by respectfully recommending in the clearest possible terms that the Comhairle should refuse planning permission for this project.
5	04.10.2024	<p>I refer to Application Reference 24/00155/PPDM noted above and would raise the following objections to permission being granted for the proposed installation of a Battery Energy Storage Facility.</p> <p>The Environmental Impact</p> <p>A The installation of such a facility could result in the release of harmful emissions, particularly during construction, maintenance or in the case of accidents resulting in adverse effects of air quality in the area.</p> <p>B Battery Storage Systems involve equipment that generates noise that will not only disturb nearby residents but also local wildlife.</p> <p>C The local rural landscape will be transformed into an industrial site with the loss of an area of natural beauty.</p> <p>Safety Concerns</p> <p>A Battery Energy storage systems pose a significant fire hazard. Housing in the area is downwind of the proposed site which taking into consideration the prevailing south west wind will increase the chance of fire spreading.</p> <p>B Will the local Emergency Services have adequate resources or expertise to handle a specific emergency relating to battery storage that often require specialised firefighting techniques?</p> <p>Impact on Local Wildlife and Ecology</p> <p>A The construction and operation of the facility could negatively affect local wildlife, including sensitive habits also bearing in mind that there are bats in the area which are a protected species.</p> <p>B The introduction of such an infrastructure could affect biodiversity in the area</p> <p>Alternative Site Assessment</p>

		<p>As this area is close to a large number of residents whose quality of life will be affected by this eg noise created by the facility can the developer consider an alternative solution further away from residential properties.</p> <p>Economic Concerns</p> <p>A The installation of this industrial facility will negatively impact property prices particularly with the area not only being residential but also a tourist attraction.</p> <p>Potential Health Impacts</p> <p>A Electromagnetic Fields Exposure as battery storage facilities emit electromagnetic radiation which is a cause for concern for residents. Loss of the green space, which is the largest in this part of Stornoway, could be detrimental to residents' wellbeing.</p>
6	06.10.2024	<p>We are writing to express objections to the planning application 24/00155/PPDM involving construction of a battery energy storage facility on Newton Street, Stornoway. As adjacent residents, we have significant concerns about the proposals as follows.</p> <p>Health and Safety Concerns</p> <p>Fire Risks</p> <ul style="list-style-type: none"> • Battery storage can pose a known fire and explosion risk and the prevailing wind direction would mean that in the event of a fire or similar then impacts would propagate in the direction of residential properties. • The presence of the neighboring diesel power plant compounds this hazard in the event of fire/explosion. • Looking at the representation made by Merseyside Fire where a fire/explosion occurred from a similar battery storage operation, we have significant concerns given the reported presence of hydrofluoric acid and hydrochloric acid in the resultant plumes. CDC guidelines on HF gas (https://emergency.cdc.gov/agent/hydrofluoricacid/basics/facts.asp#:~:text=Hydrogen%20fluoride%20gas%2C%20even%20at,fluid%20buildup%20in%20the%20lungs) gas indicate that it is an irritant at low levels but that breathing it in in high levels can result in death from irregular heartbeat or fluid in the lungs. Given the firefighters responding to said Merseyside incident were instructed to remain upwind of the site for safety, as a downwind resident this is particularly worrisome. With respect to potential for damage to ecological receptors also I note the proximity to the harbour (we have seen otters

and seals in the tidal basin opposite our house). Although the layout of site drainage may capture any run-off containing HF or HCL towards these receptors, this would not be the case in the direction of residential properties where I note no drainage is currently proposed. Additionally, the explosion resulted in debris being thrown up to 20m+ from the site, and this and the plume of HF/HCL could result in possible contact with contaminated substances for residents or dogs etc in the area. Notably dermal contact with HF can be fatal even in small doses. HF reacts with calcium in the body - disturbing the signals of neurotransmitters and interrupting the nervous system's signals telling the heart to beat. In addition to this, it can cause significant pain/burns, and effectively 'melt' bones. HF vapour presents additional risks, given it can be inhaled. I (Dr Middlemiss) have spent ten years working with this chemical on a daily basis in a laboratory setting, and note that there was no chemical that was treated with greater precautions when handling. A matter of millilitres of this fluid would be handled only inside a screened fume cabinet, wearing two pairs of nitrile gloves, a pair of rubber gauntlets, a rubber apron, and a visor to protect the face; such was the severity of the risks to the human body. The fact that HF is easily dilutable is entirely beside the point with regards to the health risks of this chemical.

- We have concerns over the ability of local fire/emergency response crews to deal with a similar incident from the development, given the island has a fire service that is mostly retained, presumably without the potential resources that were available at the time of the Merseyside explosion. No emergency response plan is available in support of the development.
- Figure 4 of the battery health and safety statement indicates the potential access points in the event of a fire. There is a potential for these access routes to be compromised, given all lie downwind of the prevailing wind direction.

Noise Pollution

- General UK government guidance ([Noise nuisances: how councils deal with complaints - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/noise-nuisances-how-councils-deal-with-complaints)) states that nuisance levels of noise for residential areas are classed as those above 34dBA or 10dBA above the background level if this is above 24dBA if the underlying noise is less than 24dBA. The acoustic modelling completed for the development indicates that this level would be significantly exceeded. Additionally, the modelling does not appear to be based on any actual measurements of background noise in the area (Noise Impact Assessment, Batter Point Energy Storage,

Stornoway. Bureau Veritas, 18 April 2024, 19591540/rmg/R1/v3).

- We note the Council have requested NR25 be met for a 1st floor room at closest receptor (1 seaview terrace), assuming an open window of at least 5 cm. Table 5.3 of the NIA report makes it clear that without a window for attenuation, NR25 will not be met across most of the tested bandwidth (125Hz - 8KHz). A window would therefore be required to meet the criterion. In the model it is quoted (from BS 8233:1999) that a partially open window will provide 10-15dB attenuation, and those writing the report decide to use 13dB attenuation (rather than taking the more conservative number (in this case 10dB) which they take in other parts of the report. This attenuation value of 13dB enables them to say (in table 5.4) that NR25 would be met for the required situation. However, had a more conservative value been taken of 10dB of attenuation, NR25 would still not be met at 250Hz and 500Hz. Additionally, the report states that downwind conditions have been assumed, but does not state any details about what wind speed assumption was made. This will impact the results of the model so it is important that this factor is clearly presented, particularly given the exposed nature of the site, and the significant wind speeds that we experience in this area (with a prevailing wind direction blowing directly towards the closest housing).
- Although an acoustic barrier is proposed with the construction of the battery storage facility, the NIA report makes general statements of what this could include, suggesting a fence or brick wall would be appropriate. No further details are included on the Proposed Fence Plan and Elevations drawing (ref. 21-001-P-15) which merely confirms the barrier will be 4m high, while we note elsewhere Greenspan Agency suggest a concrete wall or similar based on the representation made by Merseyside Fire Service relating to their incident report (referenced above). A 4m high brick/concrete wall would be a visual blight (noting as before that no mock up photos of this view of the site have been presented). In the event that these options are the only ones feasible to mitigate noise levels (and indeed based on the requirement for additional fire and blast protection per the above) then could visual screening with further hedges be incorporated?

Environmental Impact

- While the Statement of Biodiversity Enhancement report (Greenspan Agency, 12 September 2024, no ref) suggests that

		<p>the biodiversity of the site will be improved by the development via planting a native hedgerow and seven native trees and reseeded grass areas, we note that biodiversity/ecological surveys have not been delivered in support of this statement to confirm the number of species currently present or able to utilise the space (e.g., insects/birds/bats/flora etc) nor whether the noise of the development (See also points below) would enable their return to the site following introduction of hedge/trees. With particular reference to bats we note that we see these flying over the area and as a particular protected species would expect to see surveys confirming no impact to them in terms of loss of hunting habitat - given they hunt with sonar it is logical to anticipate issues for them). Regarding birds, we further note that although it is assumed the hedges and trees would provide habitat for them, no consideration appears to have been given to whether the noise of the development would prevent their nesting/use of the area. Finally, although the plan includes for reseeded grass areas there are no details to suggest this will improve biodiversity (e.g., may not be adding any benefit if the grass is limited to one species or doesn't include wildflower mix) given that wildflowers are currently also part of the area (thistle species, red clover etc). Ecological surveys and assessment are clearly required and should include a full biodiversity survey to support claims of biodiversity enhancement/net gain.</p> <p>Additionally, the proposals involve using the only greenspace in the area which would be a significant loss in terms of providing a valued space for local dog walkers and children playing. Reduction in green space has also been shown to negatively impact mental health. The World Health Organisation states that: <i>“Urban green spaces, such as parks, playgrounds, and residential greenery, can promote mental and physical health, and reduce morbidity and mortality in urban residents by providing psychological relaxation and stress alleviation”</i> in their 2016 document <i>“Urban Green Spaces and Health”</i> The image below demonstrates that the proposed site area represents the only significant publicly accessible green space in this area of Stornoway.</p>
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		<p>Economic Impacts to Local Residents</p> <ul style="list-style-type: none"> • It is mathematically demonstrable that proximity to an industrial site has a detrimental effect on house prices. For example, Vor and de Groot (2011) state: “results clearly show that the presence of an industrial site has a statistically significant negative effect on the value of residential properties: housing prices rise with increasing distance to its nearest industrial site” in their paper, The Impact of Industrial Sites on Residential Property Values. As owners of number 38 Newton St, we have a great deal to lose by a former green site in front of our house being replaced by an industrial area. The fact that this site will mean that a 4m barricade will be place between our house and the view of the sea has clear implications on property value. • Additionally, we are also owners of number 37 Newton Street, which is run as a holiday rental business. This business makes up 50% of our household income, and has allowed us to move back to the island and start a family. It is clear that guests choose our holiday cottage due to its proximity to the harbour. Having a large new industrial site could materially damage our income if guests are dissatisfied by either the building works during the construction phase, or as a result of the cottage becoming sandwiched between two industrial areas.
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		<ul style="list-style-type: none">• The visual photomontage package provided in support of the application notably does not include any images from the perspective of local residents and only incorporates views where an industrial feature (diesel plant) exists in the background. Such is not an accurate representation of the visual blight the development will introduce to local residents. See above concerns regarding reduction in house prices and loss of income.• In the Design and Access Statement (Greenspan Agency, 18 April 2024, no ref.), the location of the site is justified by classifying the area as industrial and noting the development as ‘sympathetic to neighbouring land uses’. Although a diesel power station is present to one side of the proposed development, the majority of the surroundings are entirely residential across Seaview Terrace/Newton St. As a neighbouring resident, classing the area as industrial and the development as sympathetic does not appear justified. Furthermore, it is stated in Sections 2.1 and 2.5 that the site was partly chosen due to its being adjacent to the SSE facility and the requirement for connection to the existing grid. While this location may be the only current site meeting these criteria, we note multiple proposals for wind farms elsewhere across the island which also require grid connections to be established and would consider these would also provide good options for the battery storage facility location given their situations have no adjacent residents.
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