

Anna-Mairi NicCriosnaidh  
Planning Department  
Comhairle nan Eilean Siar

Our Ref: PCS-20001419

Your Ref: 24/00155/PPDM

SEPA Email Contact:

By email only to: [planningconsultations-sty@cne-siar.gov.uk](mailto:planningconsultations-sty@cne-siar.gov.uk) [planning.north@sepa.org.uk](mailto:planning.north@sepa.org.uk)

15 May 2024

Dear Anna-Mairi NicCriosnaidh

## **Town and Country Planning (Scotland) Acts**

**24/00155/PPDM**

**Major Application for Battery Storage**

**Newton Street, Stornoway, Isle of Lewis**

Thank you for your consultation which was received by SEPA on 29 April 2024 in relation to the above application. We understand the reason for consultation is flooding.

### **Advice for the planning authority**

We have **no objection** to the proposed development on flood risk grounds. Please note our advice provided below.

#### **1. Flood risk**

- 1.1 The SEPA Future Flood Map indicates that the site is at possible risk of coastal flooding. You can view the SEPA Flood Maps and find out more about them at [Flood Maps | SEPA - Flood Maps | SEPA](#).



**Chair**  
Lisa Tennant

**CEO**  
Nicole Paterson

**SEPA**  
Unit 6  
4 Parklands Avenue  
Holytown  
Motherwell  
ML1 4WQ

Tel: 03000 99 66 99  
[www.sepa.org.uk](http://www.sepa.org.uk)

- 1.2 The approximate coastal flood level for the area is 4.37 mAOD including an allowance for climate change. The flood level is derived from the 200 year still water level based on the Coastal Flood Boundary Method (3.44mAOD) which does not account for the effects of wave action, funnelling or local bathymetry. The applied recommended sea level rise for the area by 2100 (0.93m) is based on the latest UK climate change predictions published in 2018 as outlined in SEPA's guidance.
- 1.3 Therefore, in line with National Planning Framework 4 (NPF4) it is required that all development on the site is limited to land which has a ground level higher than 4.37mAOD. In addition to this, a separate minimum freeboard allowance of 0.6m to account for uncertainties and the possible effects of wave action is required for finished floor levels.
- 1.4 The submitted "01-Topographical Survey (Rev A, Feb 2022)" shows lower ground levels around the site boundary with levels rising towards the centre. The 5mAOD ground level contour line lies close to the western and southern boundary line of the site i.e. closest to the shore, with the lowest level of approximately 4.505mAOD in the south-west corner. Therefore, it appears all the site lies above the coastal flood level of 4.37mAOD and outwith an area at flood risk.
- 1.5 We would normally request a separate minimum freeboard of 0.6m for any built development to account for any uncertainties and the possible effects of wave action. Although no finished floor levels (FFL) have been provided, the "Proposed Site Layout (21-001-P-3, 16/04/2024)" shows that any development closest to the shore such as the site office, would be located within the centre of the site on ground above the 5.5mAOD ground level contour line. In addition, the submitted Design and Access Statement (by The Greenspan Agency, 18 April 2024) states that "the equipment on the site will be mounted on concrete plinths and will not be vulnerable to flooding". Therefore, the site office would have at least a 1m freeboard above the coastal flood level for the area of 4.37mAOD.
- 1.6 Therefore, as the site lies outwith an area at risk of coastal flooding and all built development would appear to be on ground above 5.5mAOD, we have **no objection** to this application on flood risk grounds.

## 2. Other planning matters

- 2.1 For all other planning matters, please see our [triage framework and standing advice](#) which are available on our website: [www.sepa.org.uk/environment/land/planning/](http://www.sepa.org.uk/environment/land/planning/)
- 2.2 We are aware that further legislation regarding battery energy storage facilities is currently under consideration and in the future these developments may not fall under SEPA's standing advice and site-specific comments may be provided.

### **Advice for the applicant**

## 3. Regulatory advice

- 3.1 Details of regulatory requirements and good practice advice, for example in relation to private drainage, can be found on the [regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team at: [ahsh@sepa.org.uk](mailto:ahsh@sepa.org.uk).

If you have queries relating to this letter, please contact us at [planning.north@sepa.org.uk](mailto:planning.north@sepa.org.uk) including our reference number in the email subject.

Your sincerely,  
Barbara Olszowy  
Planning Officer  
Planning Service

Disclaimer: This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be

assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages - www.sepa.org.uk/environment/land/planning/](http://www.sepa.org.uk/environment/land/planning/)