



Appendix 2B

Scoping Opinion





The Scottish Government

Energy Consents Unit

Scoping Opinion of behalf of Scottish Ministers under Part 4 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Stornoway Wind Farm Limited

STORNOWAY WIND FARM

September 2018

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1. Introduction

This Scoping Opinion is issued on behalf of the Scottish Ministers to Stornoway Wind Farm Limited (“the Applicant”) in response to its request dated 19 July 2018 for a Scoping Opinion under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, relating to the proposed Stornoway Wind Farm. The request was accompanied by a scoping report.

Stornoway Wind Farm proposal (‘the proposed development’)

The proposed development would be located approximately 1.5 km west of the town of Stornoway, Isle of Lewis.

The relevant Planning Authority will be Comhairle nan Eilean Siar.

The proposed development comprises of thirty-three wind turbines. Twenty-four turbines would have a blade tip height of up to 187m and a rotor diameter of up to 164m. The other nine turbines would have a blade tip height of up to 155m and a rotor diameter of 135m

In addition to the wind turbines there will be ancillary infrastructure including:

- Site entrance;
- Upgrade and construction of internal tracks;
- Creation of up to seven borrow pits;
- Construction of a temporary site compound;
- Batching plants
- On-site control building and substation;
- Two permanent anemometry masts;
- Installation of Battery Storage System.

2. The Scoping Opinion

This Scoping Opinion has been adopted following consultation with Comhairle nan Eilean Siar, within whose area the proposed development would be situated. Scottish Natural Heritage, the Scottish Environment Protection Agency and Historic Environment Scotland, were all consulted as statutory consultation bodies along with other bodies which the Scottish Ministers consider likely to have an interest in the proposed development by reason of their specific environmental responsibilities or local and regional competencies. A list of the bodies consulted and their responses (where a response was received) can be found at Annex A to this opinion.

The Scottish Ministers adopt this Scoping Opinion having taken into account the information provided by the Applicant in its request dated 19 July 2018 in respect of the specific characteristics of the proposed development and representations received in response to the consultation undertaken.

In providing this Scoping Opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific

characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

This Scoping Opinion is based on information contained in the Applicant's written request for a Scoping Opinion and information available at today's date. The adoption of this Scoping Opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the Applicant information in connection with any Environmental Impact Assessment (EIA) report submitted in connection with its application for section 36 consent for Stornoway Wind Farm. This Scoping Opinion will not prevent the Scottish Ministers from seeking additional information at application stage.

Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional Scoping Opinion is sought from the Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

3. Consultation

Prior to the scoping report being sent out for consultation, a list of consultees was agreed by the Applicant and the Energy Consents Unit. For a list of respondents and copies of their responses, see **Annex A**. Each should be read in full for detailed requirements from individual consultees and for comprehensive guidance, advice and, where appropriate, templates for preparation of the EIA report.

Unless stated to the contrary in this Scoping Opinion, the Scottish Ministers expect the EIA report to include all matters raised by the consultees.

The Scottish Ministers are satisfied that the requirements for consultation set out in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.

With regards to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report.

4. Site specific issues of interest to the Scottish Ministers

In addition to specific comments below, the Scottish Ministers expect the EIA report which will accompany any application for the proposed development to include full details showing that **all the advice, guidance, concerns and requirements raised by each consultee** in the correspondence attached at **Annex A** to this opinion, have been addressed.

In their consultation response, the Planning Authority requested the applicant provide a scale drawing showing a comparisons between the dimensions of the proposed turbine design and the consented turbine design. They also requested a map to illustrate the location of the proposed turbines and associated infrastructure in relation to the consented development.

The Planning Authority also requested that consideration should be given to extending the ZTV study area from 35km to 45km to include the Wild Land areas of NW Harris-Uig Hills and Scarp.

To further inform the visual amenity assessment in relation to the impact on the Greater Stornoway settlement, the Planning Authority requested the inclusion of several viewpoints within their response.

The Planning Authority highlighted if there is any scenario where the proposed Stornoway Wind Farm could be partially developed alongside the Sandwich East Community or Sandwich North Street applications, consideration should be given to scoping these developments into the assessment.

Historic Environment Scotland (HES) raised concerns regarding heritage assets being grouped for assessment where they are considered to be related. In some instances related assets can have differing impacts, HES would appreciate the opportunity to see these groupings and comment before the full assessment is undertaken.

HES recommend that potential mitigation is explored in relation to the scheduled monument known as Druim Dubh, stone circle. The proposed scheme has the potential to increase impacts considerably on the monument. It appears likely that a considerable reduction in this impact could be achieved by the removal of turbines 7 and 8 from the scheme, or their relocation elsewhere within the development boundary.

SNH & RSPB recommended two years worth of field data should be gathered to inform impacts upon the site, in accordance with our SNH guidance due to proximity of the Lewis Peatlands SPA. SNH also highlighted the developer would need to justify how a shorter survey period could provide a sufficiently robust basis upon which to inform the EIA.

The Scottish Ministers request that the Applicant investigates the presence of any private water supplies which may be impacted by the development. The EIA Report should include details of any supplies identified by this investigation, and if any supplies are identified, the Applicant should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.

5. Mitigation Measures

The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the EIA. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

6. Process Going Forward

It is acknowledged that the EIA process is iterative and should inform the final layout and design of proposed developments. The Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.

To facilitate uploading to the Energy Consents portal, the EIA Report and its associated documentation, when submitted, should be accompanied with a CD containing the EIA Report and its associated documentation divided into appropriately named separate files of sizes no more than 10 MB. This will also assist SNH and other consultees.

All Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit before proposals reach design freeze. This will afford an opportunity for additional comments to be provided on the final proposals at pre-application stage.

Applicants are reminded that there will be limited opportunity to materially vary the form and content of the proposed development post submission.

When finalising the EIA report, Applicants are asked to provide a summary in tabular form of where within the EIA Report each of the specific matters raised in this scoping opinion has been addressed.

ANNEX A

CONSULTATION RESPONSES

Consultee

British Horse Society
BT
Comhairle nan Eilean Siar
Defence Infrastructure Organisation
Fisheries Management Scotland
Forestry Commission Scotland
Highlands & Islands Airport
Historic Environment Scotland
Joint Radio Company
Marine Scotland
NATS Safeguarding
RSPB Scotland
Scottish Water
Scottish Environment Protection Agency
Scottish Natural Heritage
Transport Scotland

EQUESTRIAN ACCESS THROUGH WIND FARMS IN SCOTLAND

Wind farms are an important part of strategies to achieve the Scottish Government's target of producing 20% of Scotland's energy from renewables by 2020. As an organisation, British Horse Society restricts its involvement and comments (both those made by BHS at national level and those made by local BHS representatives) to those most relevant from an equestrian perspective, including safety and the potential economic impact on equestrian access or local equestrian businesses. Individual BHS members may choose to take other factors into account in supporting or objecting to wind farm development proposals.

BHS Scotland has produced this information sheet to provide guidance to horse riders and carriage drivers on access through wind farms, and to ensure that equestrian access is taken into account in design and determination of planning applications for wind farms.

Riding and carriage driving through wind farms

Many horse riders and carriage drivers are apprehensive about taking their horses near wind turbines. Some horses may initially react negatively to the sight or sound of turbines, as they would to any new experience, while others are totally unperturbed. Don't assume that wind turbines will necessarily have a negative effect on your horse, or on equestrian access. Horses are very adaptable. BHS has received many more reports of horses being unphased by wind turbines than of adverse reactions, and very few where the horse's response has not eased with familiarity and sensitive handling. In some parts of the country, wind farms provide welcome new opportunities for off-road riding and carriage driving.

Legal context for access through wind farms in Scotland

- The Land Reform (Scotland) Act 2003 provides a right of access for all non-motorised recreational users to most land, provided these rights are exercised responsibly. This includes wind farms (other than during the construction phase – see below).
- The network of tracks built during wind farm construction often provides good opportunities for year-round multi-use access, but does not always link into other routes off the site. There may be maps at the entrance to wind farms, or accessible via the internet, identifying recommended routes. Inevitably some turbines will be located close to tracks because of the economic incentive to minimise the distance between main tracks and individual turbines.
- Access rights also apply to the land between turbines, although most wind farms are built on exposed sites, often on boggy ground which may not support equestrian access. Look at the vegetation and weigh up the ground conditions carefully before you wander off the track.
- Access rights are suspended on land where building or civil engineering work is being carried out, other than on core paths or rights of way. During construction access to live working areas may be restricted under Construction (Design and Management) Regulations 2007 on the grounds of public safety. The Scottish Outdoor Access Code clarifies that restrictions should be kept to the minimum area, and for the minimum duration, reasonably and practicably possible. Access to the remainder of the site should not be affected, even during construction. Existing rights of way, core paths and other promoted routes should remain open even in live working areas, other than where pre-agreed signed diversions have been put in

place to maintain access. If you find this is not the case, consult your local access authority.

Remember access rights in Scotland come with responsibilities. You are responsible for your own horse, your own safety, and deciding for yourself whether you feel the risks involved in riding or carriage driving mitigate against using certain routes. You are also responsible for ensuring your actions do not put anyone else at risk.

How do horses react to turbines?

Like humans, all horses are individual. They each react to circumstances and structures in different ways. Some will take turbines easily in their stride, others may show some initial apprehension.

Generally, horses are more likely to react to unusual noises and sudden movement than the rhythmic rotation of turbine blades. Blades which start to turn while in a horse's sight may provoke more of a reaction than those already in motion as you ride towards them, but start-up movement is usually slow and gradual, so will not frighten most horses. Horses' vision allows them to see to a certain extent behind them, so they may be frightened by something you have not noticed. Smaller turbines, particularly those with a tail fin, tend to adjust to changes in wind speed and direction more quickly than larger turbines, and the sound may change as the turbine moves. Although sudden changes in sound and movement are more likely to startle a horse, they are not dissimilar to many other hazards in windy conditions, such as loose, flapping plastic.

Some horses may react to the moving shadows cast by turbine blades, particularly if these flicker across their path, but as shifting shadows are commonplace, most horses quickly get used to this. Shadows are longest early in the day and during the evening when the sun is at its lowest.

Familiarising your horse

Riding and carriage driving are inherently risk sports. Some relish the thrill of increased risk through challenges such as cross country courses, others prefer a quiet life. When it comes to wind turbines, it's your choice how you perceive and opt to manage the risk. On the basis of experience, BHS believes that most (but not all) horses which are familiarised with wind farms in a gradual and sympathetic way will happily ride or drive past turbines.

Your own reaction will greatly influence that of your horse. By keeping calm and confident and quietly reassuring your horse, you can help minimise their reaction, just as you would in any other situation. Many riders comment how ethereal and peaceful they find the regular swoosh of turbine blades.

Horses are flight animals. When startled, their first instinct is to flee, then to turn around and look at whatever frightened them. Horses are also naturally herd animals, finding safety in numbers. You can use this to your advantage in familiarising your horse with wind turbines. The same principles apply as introducing young horses to traffic: do it gradually, ideally in the company of an experienced horse.

Before you set off

- If visiting a wind farm for the first time, you might want to have a look round on foot first, so you can plan your route in advance and just concentrate on riding or driving when you get there with your horse.

- Check the weather and do your own risk assessment. Many horses are more sensitive when it is very windy, and the stronger the wind, the louder the noise from the turbines is likely to be. During winter there may be risk of ice or snow falling off the blades, particularly if the sun comes out and prompts a sudden thaw. It is common sense to avoid wind farms, or to stay clear of individual turbines, during thunderstorms when there may be risk of lightning strike. Some wind farms, such as Whitelee near East Kilbride, have their own rangers or website offering up to date weather forecasts specific to the site, or a contact number you can call if in doubt about risks associated with adverse weather.
- Plan in advance where you are going to park to avoid interference with works traffic or other visitors. If possible, park and unload where your horse can see the turbines and then hack towards them to give your horse chance to acclimatise to something new from a distance.
- Remember to take hi-viz gear (and wear it when you are riding or driving through the wind farm) so that you are readily visible to site traffic and other recreational users.

Think, look, listen

- Expect the unexpected. Squeaks and clunks as turbines stop and start, or swivel to face the wind, are more likely to cause your horse to react than the rhythmical movement of the blades. Keep calm, and carry on.
- Turbines require maintenance, so bear in mind that there may be vehicles, and people, around. A friendly greeting will help alert your horse to someone they may not have seen working overhead, and help reduce any risk of it taking fright unnecessarily.
- Be aware that some wind farms are used by sled-dog teams for training and exercise. Keep your eyes open, and be willing to step out of the way: your brakes are likely to be better than theirs!

BHS Scotland has run several training days at Whitelee Wind Farm near East Kilbride offering riders opportunity to familiarise their horse with turbines under the expert guidance of Rhoda McVey, a highly experienced qualified BHS instructor. You can watch a DVD of the event at <http://www.youtube.com/watch?v=b0O1hZdaihl>.

Guidance for developers and planning authorities

The notes which follow offer guidance on how any potential negative impacts of wind farm development or operation can be minimised, and highlights opportunities to maximise the benefits of wind farm development for equestrian access. Chapter 7 of Good Practice During Wind Farm Construction (<http://www.snh.gov.uk/publications-data-and-research/publications/search-the-catalogue/publication-detail/?id=1618>) offers more general guidance on access and recreation in relation to wind farm design, construction and operation.

Key issues for horses

The main concerns about turbines from an equestrian perspective are:

- blade movement, particularly when blades start to turn within a horse's sight line, or blades which come into view at eye level;

- moving shadows cast by blades, which some horses may perceive as a threat to their safety, exacerbated by the fact that the object casting the shadow may not be obvious to the horse. Blade shadows are not a problem if the turbine is north of the track or path;
- sun or light flicker off blades;
- noise from turbines, particularly erratic noise during start-up or deceleration;
- risk of snow and ice shedding off blades;
- risk of electrocution (particularly during lightning strike);
- risk of injury or fright resulting from structural failure, breakage or collapse of the tower, blades or other constituent parts of turbines.

Site assessment

BHS recommends that no anemometer should be situated closer than fall over distance plus 10% from any track used, or likely to be used, by horse riders or carriage drivers, and that no associated cables should be situated any closer than 30m from an equestrian route, as the cables may be difficult to see, especially by a startled horse.

Design

BHS expects turbine siting and wind farm development plans to respect all existing equestrian access, and to consider opportunities for development of further access wherever possible. This includes access within, across, through and adjacent to sites. Scope to use new tracks constructed to enable turbine erection to link other routes outwith the site is encouraged. BHS Scotland and local riders will be happy to help identify existing riding routes, and to offer suggestions for how access could be improved as an integral part of wind farm development.

- ❖ **BHS' standard guidance is that there should be a separation distance of at least four times the overall height of turbines (i.e. to tip of blade) for core paths, nationally promoted routes such as Scotland's Great Trails and other promoted riding routes**, as these are most likely to be used by equestrians unfamiliar with turbines.
- ❖ **BHS recommends a target of three times overall height between turbines and all other routes** which pre-date wind farm development or turbine erection, including roads.
- ❖ **BHS recommends a minimum separation distance of 200 m between turbines and core paths, rights of way or promoted riding routes.**

Where recommended separation distances cannot be achieved, BHS will expect developers to demonstrate how safety issues can be addressed, including development and signage of alternative routes of comparable length, gradient and appeal to horse riders and carriage drivers to cater for those who prefer not to take their horses so close to turbines. From an equine perspective, turbines which suddenly come into view at close range without any warning are likely to cause the greatest risk of horses reacting.

Traffic during and after development

- Drivers of all vehicles visiting the site should be alerted to where they are most likely to meet horses.
- All vehicles should be required to slow down or stop when meeting walkers, cyclists, and particularly horses.

- Where construction traffic has to cross an equestrian route, this should be at right angles to the path or track, with warning notices for both vehicle drivers and horse riders/carriage drivers. Construction traffic should give way to recreational users.
- A Temporary Traffic Regulation Order should be in place before closure of any core path or promoted route which may be necessary during transportation of large components.
- Traffic movement which may impact on equestrian access should be planned to allow horse riders and carriage drivers to continue to ride safely in the early morning, evening, at the weekend and on bank holidays.
- All drivers of large vehicles should follow BHS' guidance to minimise risk to horse riders and carriage drivers (<http://www.bhsscotland.org.uk/resources-for-developers.html>).
- Where there is no alternative to using the line of a core path or promoted route as an access track during the construction phase, the route should be widened, and a fence erected to segregate vehicles from horses using the route.

Surfacing

BHS recognises that from a developer's perspective, the first priority in constructing tracks providing access to turbines is capacity to support required vehicular access, which usually involves stone surfacing, whereas the ideal surface for horses is firm, well drained turf.

Stoned tracks may increase opportunities for year-round riding, particularly over boggy or waterlogged ground, but sharp stone, particularly if unconsolidated, can quickly lame horses, and will usually restrict pace to walk. Horse riders and carriage drivers understandably feel aggrieved when paths and tracks along which they have previously enjoyed scope to trot, canter or gallop are stone surfaced as part of wind farm development, resulting in loss of amenity for equestrian users.

As a matter of policy:

- Where wind farm development or turbine erection results in loss of previously unsurfaced, firm beaten earth tracks enjoyed by horse riders and carriage drivers, BHS expects developers to provide substitute routes of similar length, gradient and character.
- BHS encourages developers to identify in their proposals what, if any action, is proposed to ameliorate the surface of construction tracks on completion of construction. Where traffic movement and natural consolidation with earth or mud is insufficient to blind sharp stone, dressing with whin dust or similar material may be necessary.
- BHS does not expect paths or tracks with a past history of multi-use, or intended for future multi-use to be surfaced with tarmac, but accepts that developers may agree to bound surfacing of specific routes for the benefit of walkers and cyclists in some instances.

Further guidance on the general principles of equestrian access can be found at <http://www.bhsscotland.org.uk/resources-for-developers.html>.

Access controls

All access controls should ensure that horse riders and carriage drivers, as well as other non-motorised users, are able to exercise their legal access rights. In order to ensure this, and in accordance with national guidance, BHS expects developers and planners to ensure that:

- In keeping with best practice and the Equalities Act, the least restrictive option is used to provide access for all legitimate recreational users. This is usually a gap.
- Where it is necessary to erect or lock gates across a track to restrict illegal vehicular access, a suitable gap, bridlegate or horse stile should be maintained alongside. Guidance on appropriate widths and designs can be downloaded from the BHS Scotland website. Sites likely to be used for carriage driving should incorporate facility such as the Kent Gap design.

Further details and specifications for gaps, gates and other access infrastructure are provided in the Outdoor Access Design Guide <https://www.pathsforall.org.uk/pfa/creating-paths/outdoor-access-design-guide.html>. BHS Scotland is happy to provide further guidance and advice where required tel. 01764 656334.

Other facilities

Incorporation within site design of areas with sufficient space for horse boxes and trailers to park, turn and unload easily will be much appreciated by horse riders and carriage drivers. Parking areas should not be close to any turbines to allow horses unfamiliar with turbines to be safely unloaded and opportunity to acclimatise. Corals, tying rails and mounting blocks are valuable additional features.



Maintenance and safety tests

The increased noise during over-speed and similar safety tests which involve rotors being sped up to capacity can be very frightening for horses, even those which are used to turbines. BHS urges all turbine owners and wind farm operators to alert horse riders and carriage drivers in advance of and during scheduled safety tests by erection of suitably placed signs on-site, on websites etc. confirming time and date to enable those concerned about their horses' reaction to avoid the turbines at relevant times. BHS also recommends that planners make it a condition of planning permission that those responsible for turbines are obliged to notify local horse owners of scheduled test dates at least five days in advance.

Guidance for riders and carriage drivers in responding to wind farm development proposals

How BHS responds to development proposals

BHS is a statutory consultee for all major wind farm development proposals in Scotland. It is not generally consulted at national level regarding erection of individual turbines, or small groups of turbines for domestic or commercial use.

For each wind farm application received, BHS consults with local riders and equestrian businesses to identify:

- existing equestrian use of the proposed site (who uses the site, how and when)
- existing equestrian use of adjacent or nearby tracks or roads
- level and frequency of existing use
- how existing use might be affected by proposals
- anticipated changes in future use
- potential for increased equestrian access through site development
- how the proposed development might impact on other equestrian interests.

In some cases BHS responds direct at national level, and in others delegates responsibility to a local Equestrian Access Group or BHS regional access representative.

Key issues to be taken into consideration in responding to development proposals

The main concerns about turbines from an equestrian perspective, which might be referred to in responding to development proposals, are summarised above.

When considering the impact of development proposals, planning authorities are likely to take account of the existing environment (i.e. what the site is like at present) and associated risks. Horse riders and carriage drivers using roads shared by motorists and other users are already in an environment characterised by noise and movement. Consequently objection to development proposals on the basis of horses being unable to cope with noise or movement is unlikely to be taken seriously. This applies to forest roads used by timber wagons as much as to public roads. Similarly objections based on increased risk of horses meeting other recreational users are unlikely to be taken into account in relation to existing multi-use paths where horses may already routinely encounter cyclists and walkers.

Bear in mind that over-exaggerating the fact that horses are inherently unpredictable flight animals may later be used in evidence against you. Planners who have read riders' comments about horses' propensity to spook every time they meet a bike or vehicle of any kind are unlikely to respond positively to future complaints about routes being developed or managed which exclude equestrian use on the grounds of safety risks to other users. Similarly wind farm developers are unlikely to be willing to consider requests for developing additional new multi-use routes through wind farms if you have already protested that you would never go within five miles of a turbine.

It's also worth avoiding the risk of throwing the baby out with the bath water. No matter how strongly opposed you may be to a proposed development, consider carefully whether it is worth commenting on how any potentially negative effects from an equestrian perspective could be minimised, or flagging up opportunities for development of valuable new equestrian facilities or routes linked to development.

Design considerations

The location of individual turbines can have a major impact on horses' response. The following points are worth bearing in mind when considering the equestrian impacts of proposed developments:

- Horses are generally less concerned by turbines if they are able to acclimatise to the noise and sound as they approach. Turbines in close proximity to a path or track which suddenly come into view without any warning may pose more of a problem.
- Blade shadows are not a problem if the turbine is north of the track or path.

Equestrian access

In assessing the effects of proposed development on equestrian access, BHS recommend that you take account of the following:

- Which turbines are the most critical in terms of any potential adverse impact from an equestrian perspective? Identifying which you feel are totally unacceptable, and why, will help developers tailor their proposals to minimise the adverse impacts. Take into consideration not only how close turbines are to existing tracks, but also how readily visible they are: will they suddenly come into view as you round a corner from dense forestry? How far is the closest turbine from any parking area(s), or where you would enter the site? Most horses unaccustomed to turbines are unlikely to take kindly to being unloaded where turbine blades are swooping overhead, but have no problem if they have time to acclimatise from a distance.
- How will site construction or development, particularly construction of stone access tracks, affect the nature of routes currently used for riding?
- What scope is there to make proposed tracks or access roads more useful or acceptable from an equestrian perspective?
- What alternative routes are currently available, or could be developed to avoid the turbines or to substitute for sharp stoned access roads?
- What scope is there for extension or further development of the wind farm access track network to link with other routes outwith the site?

Submitting your comments

- Research your facts carefully. Details of the number and proximity of horses which might be affected by the proposed development, or the number currently making use of the proposed site, or a particular route, will help back up your case.
- State the basis or justification for your comments as clearly as possible.
- Work with others. Submissions that have the support of walkers and cyclists are stronger.
- Remember the significance of numbers, and that each letter counts as one objection. Letters from 10 individual members of a local riding club or riders access group will therefore have far more impact than a single letter from a group which purports to represent 50 members.
- If you decide to object, make sure you include the critical phrase "I/we object to...." within your submission, and state your reasons for objecting.
- Substantiate your comments or objections wherever possible by reference to relevant local planning policies, BHS guidance re. separation distances between turbines and riding routes etc.
- Providing a template or summary of points which you wish to encourage others to submit in response to wind farm applications can drum up more support, but planners are likely to take individual letters much more seriously than mass produced identical letters, even if individually signed.

Case study – Grimes Wind Farm, Cumbria

Considerable weight was attached to the potential significant adverse impact on three equestrian businesses in refusing planning permission for this wind farm. In each case, the highly volatile nature of visiting young horses and breeding mares, particularly bloodstock and those in race training, was influential in justifying the impact of turbine development. Use of bridleways by local horses which would have opportunity to become accustomed to the turbines was largely discounted as an objection.

Case Study - an example of refusal of planning permission

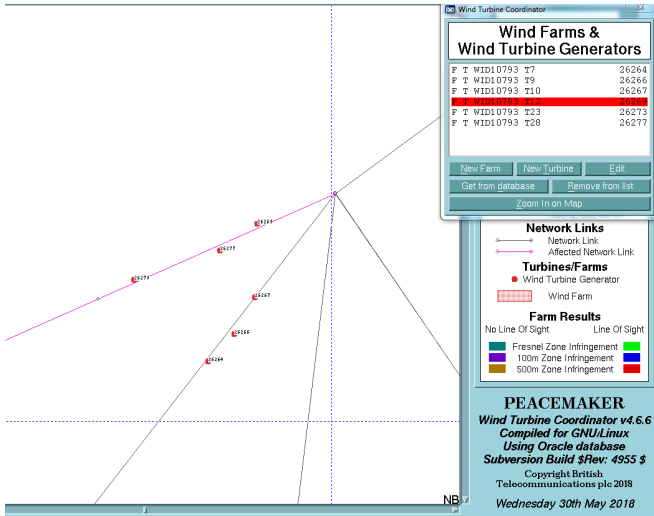
Proposals were submitted to Aberdeenshire Council for erection of two 800 kw wind turbines (hub height 55 m, total height 79 m) and associated infrastructure at Newton of Flouzie, in Banffshire. Balhagan Equestrian Services objected to the proposal on the basis of the potential impact of the proposed turbines on the riding stables, which is located approximately 500 m north of the nearest turbine. The business specialises in training and schooling of young horses as well as offering riding, stable management and a range of livery services. Balhagan commissioned an expert witness who undertook a risk assessment of the impact of the two proposed turbines on the business and its users, which concluded that the proposed turbines would have an extremely detrimental impact on any horse on or near the property, that the turbines would increase the risks to training and working horses at the stables, and to their riders, and consequently horse owners would seek other more suitable training facilities elsewhere, resulting in loss of business. BHS supported the objection on the basis that the construction of the turbine in such close proximity to the arena would force Balhagan out of business. The reporter appointed by the Scottish Ministers noted that “it would be naive to think that the proposed turbines would have no effect on the behaviour of some horses at the stables, and on adjoining roads (<100m from the turbines) well within the BHS guideline distance...(particularly given the age of the horses). Nevertheless I remain to be persuaded that the increased risk to the welfare and safety of horses or the persons handling them would be of such a scale as to lead to horse owners withdrawing their horses and taking their business elsewhere in sufficient numbers to lead to the demise of the business.” Taking account of the conflicting evidence submitted by the appellant regarding livery yards operating in close proximity to turbines elsewhere in the country and to the provision of bridleways as an integral part of some wind farms where horse riding is actively encouraged and promoted, the reporter concluded “I am not in a position to be certain that the proposal would have a significant adverse impact on the viability and future of the equine business.” The proposal was, however, deemed unacceptable on the grounds of landscape and visual impact, and consequently the equestrian issues were not further pursued.

If you need further advice on equestrian access in Scotland, contact your local BHS access representative (see www.bhsscotland.org.uk for contact details) or Helene Mauchlen, national manager for BHS Scotland Tel. 01764 656334 or email Redacted@bhs.org.uk.

For guidance on equestrian access in England and Wales, contact Access and Rights of Way Department, The British Horse Society, Abbey Park, Stareton Lane, Kenilworth, Warwickshire CV8 2XZ. Telephone 02476 840581. Email access@bhs.org.uk.

VWG

Updated March 2018



TURBINE 12-

Wind Turbine Coordinator Analysis Results																						
F T WID10793 T7	26264	Tx Name	Tx NOR	Rx Name	Rx NOR	Link ID	RARef	Path Length	Freqband	Tx Grnd Hgt	Rx Grnd Hgt	Tx Ant Hgt	Rx Ant Hgt	Tx Bearing	Dist	lat	lon	100	500	S/I	LoS	LoS
F T WID10793 T9	26266																					
F T WID10793 T10	26267																					
F T WID10793 T23	26273	EITSHAL RS	NB3055030340	STURBWAY BT RS	NB4007034570	6501011	490196	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	80.54	P	P	P	P	Y	Y	Y
F T WID10793 T28	26277	EITSHAL RS	NB3055030340	STURBWAY BT RS	NB4007034570	6501012	490197	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	80.54	P	P	P	P	Y	Y	Y
		EITSHAL RS	NB3055030340	STURBWAY BT RS	NB4007034570	6501013	490198	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	80.54	P	P	P	P	Y	Y	Y
		EITSHAL RS	NB3055030340	STURBWAY BT RS	NB4007034570	6501014	490199	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	80.54	P	P	P	P	Y	Y	Y

TURBINE 23-

Wind Turbine Coordinator Analysis Results																					
F T WID10793 T7	26264	Tx Name	Tx NOR	Rx Name	Rx NOR	Link ID	RARef	Path Length	Freqband	Tx Grnd Hgt	Rx Grnd Hgt	Tx Ant Hgt	Rx Ant Hgt	Tx Bearing	Dist	lat	100	500	S/I	LoS	LoS
F T WID10793 T9	26266																				
F T WID10793 T10	26267																				
F T WID10793 T15	26269																				
F T WID10793 T26	26271	EITSHAL RS	NB3055030340	STURBWAY BT RS	NB4007034570	6501011	490196	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	53.60	P	P	P	P	Y	Y
		EITSHAL RS	NB3055030340	STURBWAY BT RS	NB4007034570	6501012	490197	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	53.60	P	P	P	P	Y	Y
		EITSHAL RS	NB3055030340	STURBWAY BT RS	NB4007034570	6501013	490198	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	53.60	P	P	P	P	Y	Y
		EITSHAL RS	NB3055030340	STURBWAY BT RS	NB4007034570	6501014	490199	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	53.60	P	P	P	P	Y	Y

TURBINE 28-

Wind Turbine Coordinator Analysis Results																					
F T WID10793 T7	26264	Tx Name	Tx NOR	Rx Name	Rx NOR	Link ID	RARef	Path Length	Freqband	Tx Grnd Hgt	Rx Grnd Hgt	Tx Ant Hgt	Rx Ant Hgt	Tx Bearing	Dist	lat	100	500	S/I	LoS	LoS
F T WID10793 T9	26266																				
F T WID10793 T10	26267																				
F T WID10793 T23	26273	EITSHAL RS	NB3055030340	STURBWAY BT RS	NB4007034570	6501011	490196	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	106.29	P	P	P	P	Y	Y
EITSHAL RS	26277																				
EITSHAL RS			NB3055030340	STURBWAY BT RS	NB4007034570	6501012	490197	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	106.29	P	P	P	P	Y	Y
EITSHAL RS			NB3055030340	STURBWAY BT RS	NB4007034570	6501013	490198	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	106.29	P	P	P	P	Y	Y
EITSHAL RS			NB3055030340	STURBWAY BT RS	NB4007034570	6501014	490199	10.40	60Hz UPPER	206.00	100.00	12.00	16.50	62.10	106.29	P	P	P	P	Y	Y

245 The number of turbines, turbine parameters and coordinates detailed below are indicative and may be subject to change during the EIA process.

Table 2.1 Candidate Turbine Parameters (Scoping)

	Candidate Turbine Model 1	Candidate Turbine Model 2
Blade Tip Height	155	187
Rotor Diameter	135	164
Hub Height	c.80-90m	105

246 The indicative turbine coordinates and tip heights of each turbine, as illustrated on the layout in Figure 2.2 in Appendix A, are presented in Table 2.2.

Table 2.2 Turbine Coordinates

Turbine Number	Easting	Northing	Maximum Blade Tip Height
1	134912	931497	187
2	135246	930907	187
3	135895	931064	187
4	136535	931467	187
5	136800	931025	187
6	137233	931605	187
7	137518	931202	187

Turbine Number	Easting	Northing	Maximum Blade Tip Height
8	138079	931143	155
9	138050	931752	155
10	138463	932490	155
11	138217	932061	155
12	138512	933966	155
13	138728	934704	155
14	138660	935274	155
15	138269	935736	155
16	138719	935884	187
17	138069	935727	187
18	137489	935215	187
19	136859	935205	187
20	136220	934679	187
21	137450	932746	187
22	136682	932687	187
23	136033	932835	187
24	135551	932107	187
25	136181	931959	187
26	136938	932097	187
27	137725	932254	187
28	137755	933425	187
29	137322	933877	187
30	136584	934477	187
31	137282	934497	187
32	138030	934049	187
33	138138	934310	155



Comhairle nan Eilean Siar

PLANNING AUTHORITY REFERENCE: 18/00285/CONSG

ENERGY CONSENTS UNIT REFERENCE - ECU00000646

RESPONSE TO CONSULTATION ON EIA SCOPING OPINION

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

NATURE OF PROPOSAL (DESCRIPTION): SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION STORNOWAY WIND FARM, APPROXIMATELY 1.5KM WEST OF THE TOWN OF STORNOWAY, ISLE OF LEWIS

SITE: STORNOWAY WIND FARM, PENTLAND ROAD TO ACHMORE, ISLE OF LEWIS

PROPOSED DEVELOPMENT: APPROXIMATELY 33 TURBINES (24 NO WITH POSSIBLE TIP HEIGHT OF 187M AND 9 NO WITH POSSIBLE TIP HEIGHT OF 155M) AND ASSOCIATED INFRASTRUCTURE, SUBSTATIONS, BORROW PITS ETC

1. Introduction

Comhairle nan Eilean Siar (CnES) has received a request under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the Regulations') for a scoping opinion in respect of the proposed development at Stornoway Wind Farm, Pentland Road to Achmore, Isle of Lewis.

The purpose of a scoping opinion is to provide the planning authorities opinion as to the information that should be supplied within the EIA report. This Scoping Response should be read as a response to and therefore in conjunction with 'Stornoway Wind Farm Scoping Report' - July 2017 by Wood Environment & Infrastructure Solutions UK Limited.

This response sets out the opinion of Comhairle nan Eilean Siar on the Scope of the EIA Report with a focus on matters that are likely to result in a significant impact upon the Environment.

2. Description of the Development

Stornoway Wind Farm Limited is proposing to submit an application under section 36 of the Electricity Act (1989) (as amended) to construct and operate a wind farm currently anticipated to comprise around 33 turbines with a generating capacity in excess of 50MW on the site of the consented Stornoway Wind Farm. The current section 36 consent for 36 wind turbines was granted in September 2012, this was for 36 wind turbines at 143.5m (to blade tip) which would have a maximum generating capacity of 129.6MW (not 129.5MW as stated in the scoping report Item 2.3.1).

In May 2015 an application was made under the Electricity Act 1989 to vary this consent with regard to the layout, output and size of the wind turbines and this was granted in spring 2016. Stornoway Wind Farm currently has a maximum generating capacity of 180MW with each turbine having an output of up to 5MW and a blade height of 145m above ground level and a rotor diameter of 107m.

The proposed repowering development would comprise a different layout of 33 turbines (approximately 25 with blade tip height of 187m and rotor diameter of 164m; and 8 turbines with a blade tip height of 155m and a rotor diameter of 135m) which would maximise potential renewable energy generation of the site. The EIA Report should identify the number of turbines of each respective height and generating capacity and their OS Grid co-ordinates in 6 figure (Eastings Northings). The Max total MW of the development as proposed is stated as 200MW (from the [energy consents](#) website).

3 Consented Development

The LDP Wind Energy SG 'Repowering' policy states that applications for repowering will be assessed against the policies of the Wind Energy Supplementary Guidance and that the current use of a site as a wind farm will be a significant material consideration in the assessment of applications for repowering. The consented development was assessed under the Outer Hebrides Local Development Plan 2012 and Wind Energy Supplementary Guidance 2013 while the proposed new application is likely to be assessed against the Outer Hebrides Local Development Plan 2018 and Wind Energy Development Supplementary Guidance 2018 (subject to further review into 2019). Comhairle nan Eilean Siar and the Scottish Government are supportive in principle of redesigned sites which maximise efficiency and return, but a presumption of approval of an application for a material change in turbines height and scale cannot be assumed. The application will be assessed within the planning policy framework on its own merit, with contribution to energy targets balanced against environmental impacts and site specific circumstances and due regard given to relevant material planning considerations.

The scoping report states that the proposed development has the benefit of being able to draw on previous surveys and assessment work related to the consented Stornoway Wind Farm, however it should also be acknowledged that the layout and details proposed are different to those of the extant section 36 consent (e.g. turbine/roads layout, turbine height etc.) and the character, scale, and environmental/cumulative impacts of the development need to be assessed accordingly.

The applicant should have regard to the advice of consultees and carry out new survey where required to underpin the EIA assessment.

The scoping report should clarify the exact configuration of the turbines; it is our understanding that twenty-four of the proposed turbines will be 42m higher and eight turbines will be 10m higher than the consented turbine height of 145m.

The EIA baseline for re-powering is that of 'no windfarm' (or in the case of a developed windfarm, a restored site - reference SNH consultation draft guidance - June 2018.

<https://www.nature.scot/sites/default/files/2018-06/Guidance%20Assessing%20the%20impact%20of%20repowered%20wind%20farms%20on%20nature%20-%20consultation%20draft%20-%20June%202018.pdf>

Therefore while, the difference in tip height between a former and current scheme is not the basis of the EIA assessment it would nevertheless be useful to provide in supporting information a scale drawing showing a comparisons between the dimensions of the proposed turbine design (height and scale) versus the turbine design forming the consented scheme.

Item 1.3.3, (page14) can you clarify for all the use of the name Uisinis with reference to the consents at Muaitheabhal Wind Farm. This collective name is used in Table 5.2 pages 47&48; and on page 43, Item 5.3.9. It would be an aid to clarity if this table was presented on one page.

4. Project Description

Item 2.1.3 (page17) it is the Pentland Road that runs through the northern part of the Site, and partly along the western boundary. The Pentland road is not classified but is an adopted road. The A858 is to the south of the site and outwith the site (please see note below Item 2.4.16, on the page below).

Item 2.1.7 Please correct spelling to: **Baile an Truseil**, and **Druim Leathann** scheme.

5. The Proposed Development

Wind Turbines - we note that the number of turbines, parameters and coordinates are subject to change during the EIA process, but could you please clarify the discrepancy between page 5 and page 18 with regard to the turbines. Are there 25 or 24 at the higher height? Please confirm the output of each turbine type?

Site Access, Item 2.4.16, please note that there was an error in a previous map version which has caused some confusion over the classification of the Pentland Road, this single track road is unclassified, and is not the A858, this classified road is to the South and is out with the site boundary. Please ensure that the most recent versions of OS Mapping are used for the assessment. The 250,000KM road map has been revised recently.

Item 2.5.5 Lewis Peatlands **SPA** not SAP.

Please clarify Item 3.5.2.

Item 3.7.2, while it is acknowledged that a robust methodology or verification of same for EIA purposes may not be possible, it would nevertheless be useful to have a computer generated virtual reality demonstration showing what the proposed development will look like on approach from the ferry route, through the town (Bayhead) and on the A859 showing the different layout and turbine heights. This additional information would provide laypersons with a useful impression of the development and may also be a tool to aid in the assessment of the impact of the development.

6. Policy Context

In progressing the development of the proposal particular regard should be afforded to the relevant provisions of National Planning Framework (NPF3), Scottish Planning Policy (SPP), as well as other relevant national policy guidance; the provisions of the Outer Hebrides Local Development Plan (to be adopted 2018) and the statutory Supplementary Guidance for Wind Energy Developments (Wind Energy SG).

Item 2.5.6, it should be noted that the Wind Energy SG is anticipated to be revised in 2019

7. Scottish Government Onshore Wind Policy Statement and Scottish Planning Policy

Scottish Government states that repowering can take several forms, but is simply an application for a new onshore wind development on a site where onshore wind represents the established land use or forms part of the planning history of the site.

The Scottish Government's position in the 2017 Onshore Wind Policy Statement (OWPS) remains one of clear support in principle for repowering at existing sites. This is on the grounds of its potential to make the best use of existing sites, and, through the continued use of established infrastructure, grid connections and strong wind resource, to provide a cost effective option to deliver renewable and decarbonisation targets.

The OWPS states that established land use will be a material consideration in determination of any application for a repowering proposal. In each case, a new consent will need to be applied for,

notwithstanding the steer now in Scottish Planning Policy that areas identified for new proposals continue to be sited for use “in perpetuity”.

New wind farms, including on repowered sites, need to continue to be sited and designed to ensure environmental impacts are minimised and to protect residential amenity and every repowering application should continue to be assessed on its own merits. Repowering can include a wide range of development proposals – and accordingly a range of potential environmental and other impacts which should be fully assessed, as with other new developments.

The Scottish Government would encourage developers to renegotiate community benefits and/or shared ownership arrangements, or introduce new discussions on these aspects, at an early stage of any repowering application or decision, and to do so in line with these good practice principles.

Scottish Planning Policy 2014 introduces a presumption in favour of development that contributes to sustainable development. SPP also requires that planning authorities through their Development Plans “should seek to ensure an area’s full potential for electricity and heat from renewable sources is achieved, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations.

8. Outer Hebrides Local Development Plan and Wind Energy Supplementary Guidance

While acknowledging that all policies of the Plan apply, the following key ones should be included/added to table 4.2 (p.38): Policy PD1: Place-making and Design; Policy PD6: Compatibility of Neighbouring Uses; Policy ED1 Economic Development; Policy ED5 Minerals; Policy EI2 Water and Waste Water; Policy EI9 Transport Infrastructure; Policy EI12 Developer Contributions; Policy NBH3 Trees and Woodlands; Policy NBH4 Built Heritage (esp. relevance re setting of War Memorial etc).

Local planning policy is provided in the Outer Hebrides Local Development Plan (LDP). The developer should be aware that any subsequent application will be assessed under the LDP 2018. The current revised Wind Energy SG (2016) will be re-adopted with minor changes only in 2018 but is due for more extensive revision in 2019. The SG has the same statutory basis as the LDP and is read in conjunction with the LDP when determining wind energy planning applications. Policy EI8: Energy and Heat Resources states that the type, scale and size of the proposed development will have a significant effect on the way the Comhairle will consider an application and the level of accompanying information that will be required.

The Wind Energy SG ‘Repowering’ policy states that applications for repowering will be assessed against the policies of the SG and that the current use of a site as a wind farm will be a significant material consideration in the assessment of applications for repowering. Proposals for repowering should make use of existing infrastructure and limit the need for additional footprint and that in determining applications for repowering the reasons for any change to the existing infrastructure will require to be justified by the developer. We would expect the ER to be able to demonstrate consideration of these points.

The proposed development is located ‘outwith settlement’ (policy DS1) and is classed as a ‘wind farm’ and falls within an ‘Area of Constraint’ (with potential in certain circumstances) under the Wind Energy SG spatial strategy. The Comhairle will consider wind farm development in ‘Areas of Constraint’ subject to a satisfactory assessment against the Local Development Plan.

Further Technical and Legislation Guidance

Item 4.7.1 there seems to be an omission here.

9. Comments on Scoping Topics

The Site (in relation to the consented development)

The EIA (or at least supporting information) should include a map to illustrate the location of the proposed turbines and associated infrastructure in relation to the consented development; it was not easy to discern this from the graphics submitted with the scoping report. The scoping report states that the assessments will draw largely on previous survey and assessment work undertaken for the consented development. As it appears that the wind farm redesign has relocated a number of the turbines/infrastructure it will be important to understand the extent of the variation in layout between the consented and the proposed. An overlay of consented versus proposed at an appropriate scale would be helpful.

Site Access

The ER should indicate whether the new or improved transport infrastructure and traffic management measures will utilise a sustainable drainage system to deal with surface water.

The access road off the A859 to the site is located in proximity to a blind summit and series of bends in the road where there is fast moving traffic, obscured views of the road and an increasing number of cyclists. CnES Technical Services should advise on road safety.

The ER should provide plans of the proposed road infrastructure and indicate if the dimensions of the access routes will be changing due to increased size of the turbines.

Landscape and Visual Assessment

The Report (Item 5.3.1) mentions that the ZVT has been done for turbines that are 152m and 187m high (the specified turbine hub height for the shorter turbine is 155m in this Report at page 5, 13 and 18, etc). Please clarify this as the Notes on the ZVT (Fig 5.2) mention that this figure has been based on the following parameters - turbine heights of 145m (consented) 155m and 187m (proposed scoping). Please ensure the finalised ZVT reflects the turbine parameters accurately.

Wild Land

Given that there are areas of wild land (NW Harris-Uig Hills/Scarp) within the ZTV between 35-45km, consideration should be given to extending the study area from 35km to 45km or include these isolated sites within the cumulative study area.

It is recommended that areas of low landscape capacity (LDP SG: Map 2 SPP Spatial Framework & Other Considerations) should be included in the landscape assessment.

We would defer to SNH for their position but consideration should be given to potential for cumulative impact with the consented Muaitheabhal Beinn Mhor and Extension wind farms *Uisenis) and whether a detailed Wild Land Assessment should be scoped in to the EIA.

With regard to limiting assessment of landscape character type (LCT) to 15km, we would again defer to SNH for their position but consideration should be given to the impact on LCT within Wild Land areas outwith 15km, for example mountain massif 1 and 2 within Eisgein wild land areas.

As well as the two National Landscape designations scoped in, the study should take account of the local Historic Area designation, the Callanish Sensitive Area; this is mapped in the new LDP and mentioned in new LDP Policy NBH 6 Historic Areas. The EIA Report should also take account of the Calanais Standing Stones: Setting Document which was prepared by HES in consultation with the Comhairle. A copy of this document is available from the Planning Service by email.

Wild Land (p.43), Item 5.3.9, please correct to **Monan Community Wind Farm**, North Harris, the development has three turbines.

Visual Receptors

Viewpoint Selection

Table 5.1, we would suggest removing VP19: Pairc: Mullach Breac Mhalasgair from the selection. It appears to be a random high point but unlikely to be of interest to visual receptors.

Due to the scale of the base map underlying the ZTV it is difficult to properly which areas of the town of Stornoway from which you will be able to see or not able to see the turbines. A supplementary ZTV of hub and turbine height within 10km buffer should be provided based on a more detailed scale of base-map. This is also the case for the Callanish area.

To further inform the visual amenity assessment in relation to the impact on the Greater Stornoway 'settlement', the Comhairle request the inclusion of the following viewpoints within the 10km buffer around the site.

Table 5.1 (proposed assessment viewpoints) - the following locations have been selected in order to aid assessment of the impact of the development upon the visual amenity of the settlement of greater Stornoway being an area we might expect representations on the grounds of visual impact. If a wireframe demonstrates visibility then visualisations produced to SNH adopted standards would be welcomed for these additional viewpoints:

- Upper Newvalley 141398E 935135N;
- Newmarket 141902E 935745N;
- Oliver's Brae at NGR 143870E 942660N;
- Stornoway Co-op Car-park (beside recycling bins before you enter rear Service yard)
- any point within vicinity of Stornoway Ferry Terminal;

These additional viewpoints are requested as representative of the approach to Stornoway. If a wireframe demonstrates visibility then visualisations produced to SNH adopted standards would be welcomed for these additional viewpoints:

- Pentland Road Hebridean Way/Airidh shieling cluster at NGR 134015E 931308N;
- On Approach to A859 from Grimshader Road B897 (commuter route from North Lochs) from close of Scottish Water depot (at NGR 139452E 928473N a spot where the development site and existing built turbines in the vicinity can be viewed) or at a point further towards A859;
- Gress to Tolsta Road at NGR150108E 943385N

These additional viewpoints are requested on grounds of impact on grounds on cultural sensitivity

- Iolaire Memorial site 144493E 930524N;
- Achmore Stone circle at NGR 131735E 929262N;

Cumulative Assessments

Consideration should be given to adding some additional locations to the cumulative sequential assessments

- from a residential and cultural heritage point of view Newmarket/Newvalley, War Memorial; Gallows Hill);
- The “Barvas Moor” viewpoint used for Druim Leathann windfarm 141009E 938427N

With regard to light pollution impacting on nearby communities, such as the villages of Maryhill / Newvalley / Newmarket / Bennadrove; the points above also apply to any proposed night time visualisations/photomontages.

Cumulative Impact (neighbouring developments)

Developers should be aware of the recent EIA scoping opinion request from Sandwich East Community Wind Farm (18/00278/SCO_L) for 16 turbines on a portion of the Stornoway Wind Farm site, as well as the Sandwich North St Community Wind Turbine 17/00043/PPW which is pending consideration. If there is any scenario where both the Stornoway Wind Farm proposed wind farm could be partially developed alongside the Sandwich East Community or Sandwich North Street applications, consideration should be given to scoping these developments into the assessment, (not as stated in Item 5.4.10).

Core Paths

Policy 19 Energy Resources (current LDP) also mentions Core Paths, ‘b) no unacceptable adverse impact (including cumulative) on: landscape, townscape and visual aspects, natural, built and cultural heritage resources; the water environment; peatlands; aviation, defence and telecommunications transmitting and receiving systems e.g. broadband; public health and safety, and amenity (including noise and shadow flicker as appropriate); neighbouring land uses, transport management and core paths.’

Item 5.3.14, the Comhairle would expect the EIA to demonstrate that it complies with the following policy, Noise and Community Amenity in the Wind Energy SG, ‘Turbines should be located at least a minimum distance equivalent to 10 times the blade diameter from any regularly occupied buildings not associated with the development and at least a minimum distance equivalent to the height of

the turbine to blade tip plus 10% from public roads or paths identified in the Outer Hebrides Core Paths Plan' (page 20).

Local Recreational Routes

Please take account of new LDP policy EI7 Countryside and Coastal Access, the promoted walk the Hebridean Way long distance walking route follows the Pentland road from Achmore into Stornoway along the west boundary of the development and cuts through the top third of the site. This route should not be obstructed by the development. The Hebridean Way is included spatially in NPF3 page 62; and mentioned on page 50, '4.34 Our proposals for a national network of long-distance routes for walking and cycling, linked to local community networks, will support enjoyment of our coasts and island areas. The network has potential to improve and link a wide range of routes, including the Hebridean Way, the Kintyre Way, the Fife Coastal Path and paths along the Solway coast'.

Route 780 of the National Cycling Network goes along the A858 Achmore Road, approximately 3km to the South of the proposed development site; the EIA assessment should consider any potential impacts from the development on this route.

Item 5.3.16 Tiumpán Head (correct spelling)

For the EIA, we would like to draw attention to the statutory SG for Wind Energy, and the nature of assessment required under Landscape and Visual Impact, pages 8 & 9,

'A proposal will also be assessed for its likely impact on:

- areas of Low Landscape Capacity¹ (Map 2);
- key characteristics of landscape character types²;
- 2 Areas of Wild Land (SNH, 2014) <http://www.snh.gov.uk/docs/A1323225.pdf>;
- 3 Landscape Capacity Study for Onshore Wind Energy Developments in the Western Isles (SNH et al 2004);
- settlements;
- views from popular public viewpoints, transport routes, the core path network and
- recognised visitor locations;
- the site and setting of SAMs; Listed Buildings; Conservation Areas; and other historic sites as agreed with the Comhairle.

The spatial policy is that wind farms should be located at a distance of at least 2km from settlements. As part of the consented windfarm is within the 2km buffer the EIA should include a list of residential properties which fall within 2km of the development site and undertake a residential amenity study upon these as a minimum.

Potential Landscape and Visual Effects

With regard to the reference on page 45 to GLVIA3 for clarity please expand in the EIA Report to read **Guidance for Landscape and Visual Impact Assessment (third edition)**.

¹ Landscape Capacity Study for Onshore Wind Energy Developments in the Western Isles (SNH et al 2004)

² Western Isles Landscape Character Assessment (Richards, 1998)

Please could you update Table 5.2 (p.47), to record that the North Tolsta turbine exists. Foot Note 3 (p.47) please amend PAN to **Pre-Application Consultation** (PAC) report submitted to LPA.

Cumulative Impact (neighbouring developments)

Developers should be aware of the recent EIA scoping opinion request from Sandwich East Community Wind Farm (18/00278/SCO_L) for 16 turbines on a portion of the Stornoway Wind Farm site, as well as the Sandwich North St Community Wind Turbine 17/00043/PPW which is pending consideration. If there is any scenario where both the Stornoway Wind Farm proposed wind farm could be partially developed alongside the Sandwich East Community or Sandwich North Street applications, consideration should be given to scoping these developments into the assessment, not out as stated in 5.4.10.

Historic Environment

Pre-application discussion with Historic Environment Scotland is essential in order to identify any potential impact on Historic Environment assets and their settings early in the design process and to ascertain what level of assessment will be appropriate.

CnES recommends that the developer consult LDP Policies on the Historic Environment regarding assessment of development proposals.

The 2015 application figure 6.1 'Heritage Assets within the Proposed Development Area' identifies a number of heritage assets within the site area. There are clusters to the north and east and while the 2015 turbines largely avoided these assets, the 2018 re-design positions a number of turbines (e.g. turbines 18, 30, 23, 16, 15) in direct proximity to these sites, Archaeology should advise on whether sufficient information is proposed in the EIA to be able to assess the impacts of this variation.

It appears from the ZTV that the proposed windfarm will be visible from most of the Stornoway Conservation Area, from the Harbour and Town Centre and the Residential Area. The western edge of the conservation area, where Lews Castle is located is approximately 1.2km from the north entrance to the development site.

The site lies to the west of the Lews Castle and Lady Lever Park Inventory Garden and Designed Landscape. Lews Castle is also Listed (LB19206) Category A along with the boundary walls bounding policies of Lews Castle (Lady Lever Park). Creed Lodge (LB 18816) and Marybank Lodge (LB 18817) are Category C Listed and are located on the boundary wall perimeter adjacent to the A859. Siting and design of development should take into account the setting of listed buildings, Stornoway Conservation Area and Lews Castle and Lady Lever Park.

The Comhairle is aware of a scheduled monument (SM5504), the stone circle at Druim Dhubh outside the South boundary of proposed development site and there is also a scheduled monument (SM4355), Achmore Stone Circle which is to the South of the site.

Item 6.3.6, we would expect the EIA Report to consider non-scheduled archaeology and to consult the Comhairle archaeologist regarding the assessment of this resource, including the Sites and

Monuments Record (SMR) as suggested in Item 6.3.4; and records of recent finds arising, much of this being potential archaeology lying beneath the surface of the peat.

The Calanais Standing Stones: Setting Document (2014) has been updated and will be included online when the new LDP is adopted in the meantime this document regarding impacts on the 'Callanish sensitive Area' (Policy NBH6) Historic Areas can be issued by email. The Historic Resources policy of the Wind Energy SG states the following in relation to the Callanish Complex, and the developer should work with Historic Environment Scotland to ascertain the level of assessment that will be required in relation to this:

"If a wind energy proposal breaks the skyline at sensitive ridgelines when viewed from the component parts of the Calanais complex or is to be sited in another location where it has the potential to impact on the setting of the complex, it will only be supported if it can be demonstrated that the proposal will not have a significant negative impact on the setting of the Calanais complex. The assessment requirements will be judged on a case by case basis. More prominent developments will be subject to more detailed assessment in terms of impact on the setting of Calanais."

Item 6.3.9, 'Intervisibility of related assets such as the Calanais Standing Stones **and their satellite sites** would also be considered'. Please include reference to the other scheduled Neolithic stone circles within the Calanais Sensitive Area in the EIA Report. A list of these is included in the Calanais Standing Stones: Setting document.

Item 6.3.15, we recommend close consultation with the Comhairle Archaeologist on all aspects of the assessment of this topic including the selection of heritage assets for further assessment.

Ornithology

Item 7.3.14 identifies those species occurring on the site and its environs that are of conservation concern. All survey work requested by SNH should be carried out by the developer, to ensure it is up to date and robust for the EIA Report. SNH and RSPB should be closely consulted on all aspects of the assessment with regard to impacts on ornithology. It is noted that the site includes a number of wooded areas and subject to SNH advice it may be advisable to subject these areas to a minimum of fresh walk over surveys to rule out new nest sites.

Ecology

Item 8.3.4 - agrees with the developers undertaking to carry out surveys of otter at the substation and access track locations, and agrees that further work may be required depending on the initial findings of this work and on the advice of SNH.

Designated Sites

Please note that the Stornoway Castle Woodlands SSSI and the Loch Orasay SSSI have been declassified and are no longer designated. Therefore these two may be scoped out of the assessment for the EIA. Please ensure that the data sets you are using for the assessment are up-to-date.

Species and Habitats of Conservation Concern

We agree that the potential impact and potential effects of the proposed development on biodiversity, specifically on blanket bog, marshy grassland, acid flush, dry heath, wet heath, acid grassland, (GWDTEs) and watercourse habitats and on otters should be fully considered. The SNH website has a summary of development considerations for otters under the Habitats Regulations:

(<http://www.snh.org.uk/publications/online/wildlife/otters/planning.asp>)

The Comhairle is supportive of strategies to reduce negative effects and mitigate against predicted habitat and biodiversity loss.

We would advise the developer to consult with SEPA and SNH for specialised advice and guidance on habitat restoration and on increasing biodiversity on the proposal site. For example: planting native woodland to increase biodiversity, create bird habitat and to offset carbon emissions.

The SNH website has a summary of development considerations for European Protected Species (EPS) under the Habitats Regulations: <http://www.snh.gov.uk/protecting-scotlandsnature/protected-species/legal-framework/habitats-directive/euro/>

Fisheries

SNH will advise but consideration should be given to scoping fisheries into the EIA due to the changes in turbine/infrastructure layout and the proximity to water courses. It is recommended that consideration of the impacts of electromagnetic fields on migratory fish should also be included in the assessment and that consideration should be given to locating turbine bases and power cabling away from water courses.

For the purposes of the assessment, the developer should consult with the Western Isles Fisheries Trust (WIFT) and the Stornoway Angling Association who fish on the Creed River. Alternative access to fisheries may be required during construction; the operational phase may bring opportunities for improving access to the river system for angling purposes.

Please consult LDP Policy EI3 Water Environment for the scope of the required planning assessment.

Geology, Hydrology and Hydrogeology

The proposed development has potential for negative effects on surface and ground water which may lead to flooding and pollution. We would expect the EIA to address these concerns and prepare mitigation strategies to reduce risk.

Consideration should be given to locating turbine bases and power cabling away from water courses. Current best practice in wind farm development includes the use of 50m buffer strips to the water environment and the ER should demonstrate if this has been achieved and if not, identify the locations where it is breached.

The EIA should clarify that the proposed land based activities are located above an acceptable risk of flooding. If the Flood Risk Assessment (FRA) is separate to the EIA, the EIA should contain sufficient synopsis of the FRA and detail how the development has been designed to mitigate any identified flood risk constraint through sustainable flood management measures.

The northern access is located in an area of localised flooding and waterlogging which is prone to flooding and in period of heavy rainfall floods the main A859. Technical Services - Roads should be consulted on the information requirements for the ER in this respect.

We advise that the developer takes account of new LDP Policy EI1 Flooding; EI2 Water and Waste Water; EI3 Water Environment and EI5 Soils. We recommend that the developer consults with SEPA to inform the assessment on these topics for the EIA.

Traffic and Access

It is agreed that potentially significant effects from construction related traffic be scoped into the EIA. CnES request that it's Technical Services - Roads Department are consulted as part of the assessment for Traffic and Access.

As stated in the EIA Scoping Opinion Report the Environmental Statement should include full details of the transportation route, projected transport movements, details of the potential impact from the transportation and the associated mitigation to be implemented. A Traffic Management Plan should also be included.

Detailed drawings should be submitted showing the relevant access points on to the A859; this will allow visibility splays to be assessed.

The following conditions will apply at full planning stage:

The additional traffic arising from the construction of these developments can easily be classified as "extraordinary" and it is therefore proposed that an agreement be reached with the respective developers that:

- Pre-start condition surveys should be carried out by an independent specialist on all those roads and bridges likely to be affected by the developments at the expense of the developers;
- Similar conditions surveys be carried out by the same independent specialist on a regular basis, at least six monthly intervals, at the developers' expense for the duration of the development construction;
- Strengthening, re-alignment and road-widening works be carried out at agreed 'pinch-point' and 'at-risk' locations, including structures, to a specification agreed with the Comhairle to safeguard the integrity of the existing infrastructure for existing traffic as well as enabling the safe passage of construction and component traffic;
- The surface and general integrity of all roads used by the respective developers be maintained at their expense during all construction works;
- Any roads affected are resurfaced to an agreed specification along the lengths affected by construction and component traffic;
- The delivery of materials and components for this development should, wherever possible, be routed through the Arnish site and not through Stornoway Town Centre;
- Any and all other works required by the Comhairle as roads authority to ensure compliance with all relevant statutory and legislative requirements;

- Any access that joins a Comhairle road should be constructed in accordance with the enclosed access detail drawing 18/00285 (this is available by email).

Noise

Re the main previous consent of 11/00333/CONSG – Environmental Health note condition 47 refers to night hours 43 dB and quiet waking hours of 35 dB. It is not clear if this has been superseded in subsequent amendments. The current levels applied to new applications are 38 dB night (Between 23:00 and 07:00) and 35 dB daytime (Between 07:00 and 23:00), rather than quiet waking hours. If not already clear the developer should be using these levels in their proposed assessment referred to in Item 12.4.3 of the scoping report.

The following information must be provided in the ER to allow the Comhairle to consider likely noise impacts:

- A 6 figure eastings and northings grid reference for the exact turbine(s) location and the distance between this point and the nearest noise sensitive location;
- The mast tower height and rotor diameter of the turbines.
- The Comhairle will require details on the extent of construction works, taking account of the length of construction period, proposed times, details of any borrow pit blasting and proximity to existing noise receptors. Proposals should take account of BS5228 2009 Parts 1 and 2. Where it is believed that construction noise will be significant then a site specific noise impact assessment will be required.

Socio-economics, Tourism and Recreation

Some of the data referred to in the scoping report is at least three years old; the Comhairle recommends that for this scoping topic the study uses the most recent available data and visitor surveys to produce a robust assessment for the EIA.

The EIA should include a socio-economic impact assessment which includes an ‘assessment of the net economic impacts’ of the development, in line with the Economic Impacts and Benefits policy of the Wind Energy SG.

Tourism and recreation assets should include: horse riding (Lochside Arena); angling; walking; cycling; karting; trail-biking.

Item 13.2.3, for the assessment it would be helpful to have more recent figures to present a representative view of the local economy in 2018.

For clarity and consistency please use the name **Outer Hebrides** rather than Eilean Siar, see Items 13.2.4 and 13.2.6, 13.2.7, etc.

Correct Item 13.2.7; minor typo ‘mulit’ should be **multi** arts venue and Museaum to **Museum**. This information should be updated.

Item 13.2.8, please note that the Lews Karting Centre is no longer a public facility and is now owned by the Lewis Car Club.

There is also a network of motor cross tracks adjacent to the Karting track that is used for rally driving which is operated by Western Isles MX – admin@westernislesmx.co.uk.

The Lochside Arena is a multi-use community run facility located between the SE boundary of the development site and the A859. It consists of an indoor and an outdoor arena, indoor stables, changing and office facilities. The Lewis & Harris Riding Club (LHRC) are key users of the facility.

We recommend that the assessment includes a reference to the [Lews Castle and Museum & Archive](#), as a key visitor attraction opened two years ago. Please ensure that any data on key visitor attractions is up-to date.

Item 13.2.9 please ensure any tourism accommodation referred to is still operational and include new additions if considered relevant to the assessment.

Public Access

Item 13.2.10, please note the A858 is not the Pentland Road (see comments on pages 3 and 4 of this response. The 250,000KM road map has been updated and now includes this correction.

The Comhairle supports countryside access and notes the reference to Core paths which are near and the Hebridean Way which passes through the proposed development. The assessment should consider physical impacts on these and indirect impacts such as views from these recreational trails as people using the trails will be subjected to specific visual effects caused by the development. Core path 4 the Newmarket Gateway all ability trail is approximately 2.5km away from the site not 3km as specified in the Scoping Report (Item 13.2.10); Core Path 6 is the main network of paths in Lews Castle Grounds. Core Path 2 is the Tolsta to Ness Coastal Trail; Core Path 3 is the Gearrannan to Bragar Coastal path and Core Path 5 is the Great Bernera Circular Route. There are a number of other trails in the environs of the site that are used for public access and recreation, including trails on the opposite side of the A859 which follow the River Creed, which are part of the wider path network in Lewis.

The Comhairle considers that the proposed development has the potential to open up the provision of public recreational access: there may be potential positive effects on public health for example an extension to the existing cycle trail/recreational trail network in the Lews Castle Grounds completed this year and the development of multi-use trails suitable for horse riding and walking throughout the development site. We refer to new LDP Policy EI7 Countryside and Coastal Access and to Policy EI12: Developer Contributions and to the Chapter on Planning Obligations, page.16 of the Wind Energy SG (2016).

The Economy

Item 13.3.3, please refer to the LDP as the Outer Hebrides Local Development Plan it has never been known as the Eilean Siar Local Development Plan. The assessment should comply with the development policy in the Wind Energy SG, Economic Impacts and Benefits (page 8).

We recommend that the most recent statistical information and evidence is used for the review to be conducted. Please note that Scottish Neighbourhood Statistics no longer exists; instead we recommend that you access <https://statistics.gov.scot/home> and the Outer Hebrides Factfile at:

<https://www.cne-siar.gov.uk/strategy-performance-and-research/outer-hebrides-factfile/>

Since this is a request for a Scoping Opinion, there is little substantive information on the estimated socioeconomic impact. The developer's intention to submit detailed projected impacts on the economy, tourism, recreation and public access as part of a detailed Environmental Impact Assessment at a later date is noted. The range of socioeconomic areas identified within the request for a Scoping Opinion, for detailed analysis in the Environmental Impact Assessment, seems reasonable.

It is noted that the 2012 consented application for this site is for 36 turbines, each with a maximum tip height of 143.5m and a collective generating capacity of 129.6MW. A 2016 revision to this consent allowed for 36 turbines, each with a maximum tip height of 145m and a collective generating capacity of 180MW. The developer can only apply for 'Contract for Difference' price support incentives for the level of generation consented at the time of Auction entry (early 2019). It is therefore unlikely that the consented maximum generating capacity of 180MW will vary greatly as a result of this latest proposal, recently submitted for Scoping. That being the case, the revisions outlined in the request for a Scoping Opinion - deletion of three turbines and tip heights increasing to 187m for 24 turbines and to 155m for the remaining 9 turbines - will be designed to increase the overall efficiency of the scheme and to maximise the Renewable Energy yield from these turbines based on the latest turbine technology.

An analysis was undertaken of the developer's submitted socioeconomic impact projections in 2011. The latest proposal, outlined in the request for a Scoping Opinion, involves the deletion of three turbines coupled with an increase in turbine height. The employment impacts in construction and then in operation are likely to be broadly similar to those identified for the consented project. A more detailed analysis can be undertaken once the developer's actual socioeconomic impacts for the latest scheme are submitted as part of the Environmental Impact Assessment.

Public Access

The Comhairle agrees with the point that at the moment there is limited recreational walking within the site. The Comhairle welcomes the fact that the study will refer to guidance on public access and consider wind farm good practice documents with a view to incorporating countryside access, multi-use trails within the scheme design to provide alternative public access during the construction phase and to provide access during operation.

Shadow Flicker

The EIA should include evidence that proposals have been assessed and found to have no unacceptable significant adverse impact on community amenity in relation to shadow flicker.

In line with the Community Amenity policy in the Wind Energy SG the EIA should demonstrate that turbines are located at least a minimum distance equivalent to 10 times the blade diameter from any regularly occupied buildings not associated with the development and at least a minimum distance equivalent to the height of the turbine to blade tip plus 10% from public roads or paths identified in the Outer Hebrides Core Paths Plan.

Other Issues

Minerals

The supporting information in the ER should contain sufficient detail of the project to allow a full assessment to be made of the likely effects of mineral extraction, together with appropriate control, mitigation and monitoring measures.

To accord with our policy requirements, please consult policy ED5 Minerals for the EIA assessment.

A map of all proposed borrow pits must be submitted along with a site specific plan of each borrow pit detailing the requirements set out in Borrow Pits policy of the LDP Wind Energy SG.

Recycling

The application should detail space to accommodate the provision of recycling facilities during the construction phase.

Design Principles

The principles to be adopted in the design process should be made explicit in the EIA and the ER should provide design details such as: turbine layout, construction materials, turbine design and surface treatments, lighting, signposting, landscaping and the incorporation of any proposed natural features in the design and access statement.

Phasing and Decommissioning

Details of the proposed phasing of the project should be included in the EIA. A decommissioning statement will be required to be submitted in support of a planning application.

Existing Infrastructure, Telecommunications and Broadcast Services

We note that the developer is taking account of infrastructure, and telecommunications that potentially could be impacted by the development.

We recommend that for the purposes of the investigation into existing infrastructure in the environs and on the site, the developer to consult with Scottish Water on drinking water and waste water utilities.

Scottish Water has no objection to this development proposal and has provided a response to this scoping report which is summarised below;

Water

- There is currently sufficient capacity in the North Lochs Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted.

Foul

- There is currently sufficient capacity in the Stornoway Waste Water Treatment works. However, please note that further investigation may be required to be carried out once a formal application has been submitted.

Infrastructure within boundary

According to Scottish Water records, the development proposals impact on existing Scottish Water assets.

The applicant must identify any potential conflicts with Scottish Water assets and contact their Asset Impact Team directly at service.relocation@scottishwater.co.uk.

The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.

Scottish Water Disclaimer

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Scottish Water asset plans can be obtained from their appointed asset plan providers:

Site Investigation Services (UK) Ltd

Tel: 0333 123 1223

Email: sw@sisplan.co.uk

We recommend that the developer liaise with SHE on electricity matters; and with telecoms systems operators with interests in the area.

Air Safeguarding

We agree with the approach suggested to safeguarding and directs the developer to LDP Policy EI11 Safeguarding on this topic for the EIA.

Emission of Pollutants

We advise that the developer consult with SEPA on this topic. All mitigation should be detailed within a suitably robust schedule of mitigation. The schedule of mitigation should be supported by

these site specific maps and plans. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of the Ecological Clerk of Works, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to SEPA's Guidance for Pollution Prevention (GPPs).

Lighting

Item 15.4.10, we agree with the developer's proposal to follow SNH guidance and prepare a Night-time Lighting Assessment (NLA) due to the height of the proposed turbines. Again please clarify turbine height is it 152 or 155m for the EIA?

Population and Human Health

While there is no prescribed EIA definition of population and human health, it is generally understood to encompass a range of personal, social, economic, physiological and environmental factors which determine the health status of individuals or populations. We would recommend an assessment is undertaken as part of the EIA and consideration is given to ways in which the proposal can improve and protect health and well-being.

We advise that for the purposes of this EIA assessment the developer should consult with Dr Margaret Watts, the Director of Public Health in the Outer Hebrides, NHS Western Isles.

Climate

Although there are constraints in relation to this resource the Comhairle supports renewable energy development in the Outer Hebrides, provided it complies with development policy and does not have significant negative effects on community amenity. We refer the developer to the LDP Development Strategy (DS1); to Policy EI8 Energy and Heat Resources; and to the policies in the Wind Energy SG, particularly on Soil Resources (2016).

Soil Resources

'Where there is evidence of peat or other carbon rich soils at a proposed development site, applicants will be required to utilise the [Carbon Calculator](#) to determine the net impacts or benefits of the proposed development:

<http://www.gov.scot/Topics/Business-Industry/Energy/Energysources/19185/17852-1/CSavings>

Developers will be required to undertake peat (depth) surveys for their development proposals, and subsequent mitigation and micro-siting. (Further guidance is available in the Scottish Government's Good Practice Peat Survey Guide).

Developers should investigate the scope to utilise piled foundations on areas of deep peat or carbon rich soil in order to minimise disturbance and the generation of waste material.

The carrying out of mitigating work may be the subject of a planning condition or agreement.'

We concur with the approach suggested for the EIA.

Sustainable Resource Use

The Comhairle agrees with the approach in Item 15.7.2, particularly restoration measures to minimise the loss of soil and peat resource, which is compliant with policy EI5 Soils.

Major Accidents and Disasters

The potential for peat slide is a concern for this type of development, the Comhairle agrees with the suggested approach for the EIA Report.

Summary of Scope / Proposed Outline Content List for EIA Report (16/17)

Chapter 17 details the scope of the topics to be included in the EIA. The following topics are not specifically identified as chapters 7-15 but should be incorporated, if not already proposed, to provide evidence that the development has been assessed and found to have no unacceptable significant adverse impacts on community amenity.

This is in line with the Community Amenity policy of the Wind Energy SG.

- Electromagnetic Interference
- Phasing
- Commissioning and Decommissioning
- Public Access
- Ancillary development and Infrastructure

END



Highland and Islands Conservancy

"Woodlands", Fodderty Way
Dingwall, Ross-shire, IV15 9XB

Chris Park
Energy Consents Unit
The Scottish Government

Via email

Glèidhteachas na Gàidhealtachd's nan Eilean

"Fearann – coilleach"
Rathad Fodderty
Inbhir Pheodhearan
Sgìre Rois, IV15 9XB

Tel/Fòn 0300 067 6950
Highland.cons@forestry.gsi.gov.uk

Conservator/Neach Dion Arainneachd

John Risby

24th of July 2018

Dear Chris

Electricity Act 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Proposed Section 36 Application for Stornoway Wind Farm

Forestry Commission Scotland comments on the Scoping Report

Introduction

This document represents Forestry Commission Scotland (FCS) views on the proposed Stornoway Wind Farm, as described in the Scoping Report for the project.

In this response FCS gives its advice on a potential requirement for compensatory planting.

Background

FCS supports the Scottish Government's commitment on renewables. FCS is the Scottish Government's (SG) competent authority on forests and woodlands. As such, FCS advises on the evaluation of development proposals when they may have an effect on a woodland environment.

FCS Assessment of the Scoping Report in relation to woodland

The first consideration should be whether the underlying purpose of the proposal can reasonably be met without resorting to woodland removal.

There are areas of woodland, located mainly in the western part of the proposed development's site. Proposed turbine layout (as per Figure 2.2 – Site Layout Plan) indicates that up to 8 turbines are to be located either within or immediately adjacent to the woodland areas. Understandably, the Scoping Report doesn't provide detailed information regarding design of the proposed development, hence the scale of tree felling required to accommodate the wind turbines and supporting infrastructure (e.g. a borrow pit or an access track) is difficult to predict. The impact on woodland asset is similarly difficult to assess, for which reason FCS would welcome inclusion of a dedicated Forestry chapter within the Environmental Impact Assessment Report (EIA Report) for the proposed development. The scale of woodland removal (both temporary, to accommodate construction, and permanent – for infrastructure, and potentially, as a result of future habitat management proposals) needs to be clearly stated within the EIA Report. FCS expects to see information on areas that are to be replanted post construction on-site, and areas of permanent woodland loss, for which compensatory planting might be required. Background: Scottish Government's Policy on Control of Woodland Removal, which can be found here: <https://scotland.forestry.gov.uk/supporting/strategy-policy-guidance/woodland-expansion/control-of-woodland-removal>

Any compensatory planting would be subject to The Environmental Impact Assessment (Forestry) (Scotland) Regulations 2017. These can be found here: <http://scotland.forestry.gov.uk/supporting/grants-and-regulations/environmental-impact-assessment>

Conclusion

Woodland removal may result in a requirement for compensatory planting for an area yet to be determined. FCS will seek that this was a condition of approval and that compensatory planting had to be in place prior to construction commencing. FCS would be happy to work with the developers as plans progress so that a Compensatory Planting Plan, if required, can be developed.

If you have any queries on this advice, please don't hesitate to contact me.

Yours sincerely

Redacted

Agata Baranska
Regulations & Development Manager
Redacted @forestry.gsi.gov.uk

From: [Brian Davidson](#)
To: [Park C \(Christopher\)](#)
Cc: [Paul Hopper](#)
Subject: RE: Scoping Opinion - Stornoway Wind Farm, Isle of Lewis
Date: 26 July 2018 12:06:09

Dear

Thank you for your correspondence concerning the proposed wind farm at Stornoway, Isle of Lewis.

Fisheries Management Scotland (FMS) represents the network of Scottish District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), who have a statutory responsibility to protect and improve salmon and sea trout fisheries and the 25 fishery trusts who provide a research, educational and monitoring role for all freshwater fish.

FMS act as a convenient central point for Scottish Government and developers to seek views on local developments. However, as we do not have the appropriate local knowledge, or the technical expertise to respond to specific projects, we are only able to provide a general response with regard to the potential risk of such developments to fish, their habitats and any dependent fisheries. Accordingly, our remit is confined mainly to alerting the relevant local DSFB/Trust to any proposal.

The proposed development falls within the catchments relating to the Outer Hebrides Fishery Trust. It is important that the proposals are conducted in full consultation with the Trust (see link below). We have also copied this response to the Trust.

Due to the potential for such developments to impact on migratory fish species and the fisheries they support, FMS have developed, in conjunction with Marine Scotland Science, advice for DSFBs and Trusts in dealing with planning applications. We would strongly recommend that these guidelines are fully considered throughout the planning, construction and monitoring phases of the proposed development.

- [LINK TO ADVICE ON TERRESTRIAL WINDFARMS](#)
- [LINK TO DSFB CONTACT DETAILS](#)
- [LINK TO FISHERY TRUST CONTACT DETAILS](#)

Regards,

Brian Davidson | Dir Communications & Administration
Fisheries Management Scotland
11 Rutland Square, Edinburgh, EH1 2AS
Tel: 0131 221 6567 | **Redacted**
www.fms.scot



By email: Econsents_Admin@gov.scot

Christopher Park
Energy Consents Unit
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our ref: AMN/16/W
Our case ID: 300020287
Your ref: ECU00000646
10 August 2018

Dear Mr Park

[Electricity Act 1989](#)

[The Electricity Works \(Environmental Impact Assessment\) Scotland Regulations 2017](#)
[Scoping opinion request for proposed section 36 application Stornoway Wind Farm, approximately 1.5 km west of the town of Stornoway, Isle of Lewis](#)

Thank you for your consultation which we received on 19 July 2018 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development

I understand that the proposed development comprises 33 wind turbines and associated infrastructure. 24 turbines would have maximum height to tip of 187m and nine maximum height to tip of 155m.

There is currently permission on the site for a scheme of 36 wind turbines, with maximum height to tip of 145m. The consented scheme has yet to obtain consent under Section 19A Crofters (Scotland) Act 1993.

In light of these factors, it will be important to clearly identify what is considered to be the baseline of assessment in the EIA Report.



Scope of assessment

We are content with the area of search identified and the scope of assessment. However, we would advise that impacts on heritage assets not within the ZTV should not be immediately ruled out. It is possible for significant effects to arise from impacts on views of heritage assets, and this should be considered when decided whether or not impacts require further assessment. Further details on this are given in our Setting guidance, to which the scoping report refers.

We have further advice to offer on the proposed methodology and potential impacts. These are included as an annex to this covering letter.

In light of the comments we have offered, we strongly recommend that further pre-application consultation is undertaken as the design of the proposals develop. We would welcome the opportunity to comment on revisions and draft assessment and supporting details.

Further information

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at <http://conservation.historic-scotland.gov.uk/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Ruth Cameron, who can be contacted by phone on 0131 668 8657 or by email on Ruth.Cameron@hes.scot.

Yours sincerely

Historic Environment Scotland



ANNEX – HES comments on methodology and potential impacts

Methodology

We have some advice to offer the methodology as set out at this stage. We welcome the inclusion of a detailed methodology, and the references given to [HESPS](#), and our [Managing Change guidance](#).

We do have some concern that heritage assets will be grouped for assessment where they are considered to be related. It is not clear how big or broad these groupings would be. In some instances, such as Lews Castle, which is a listed building, and Lews Castle and Lady Lever Park (a garden and designed landscape) while there is a clear relationship, impacts may be very different. In this specific case, it would be helpful to refer to our Managing Change guidance on Gardens and Designed Landscapes for further guidance on assessing these impacts. If assets are to be grouped in this way, we would appreciate the opportunity to see these groupings and comment before the full assessment is undertaken.

The report states that assets which ‘do not have clear access’ would not be visited for assessment. Without further information on what exactly this means, we cannot comment on whether or not this is adequate for our interests. However, we would advise that lack of public access or advertised access may not be sufficient justification for lack of a site visit.

In the categorisation of importance of assets, there is no reference to Inventory gardens and designed landscapes, or Inventory battlefields. We would consider these assets to be nationally important for the purposes of assessment.

The criteria given for magnitude of change should be reviewed. We would recommend that ‘high’ magnitude impacts are re-stated in terms of impacts on the cultural significance, or key characteristics, of a heritage asset. We also note the statement for ‘medium’ magnitude identifies impact on setting that ‘changes the key characteristics of an asset’s setting’. We would consider an impact of this type to have the potential to be of greater magnitude than that stated. We would also ordinarily consider any impact which affects the cultural significance of a heritage asset to be significant, and therefore require mitigation to be explored.

Potential Impacts

Based on the information available at this stage, it is likely that our key interest in this case will be the impacts on the setting of the scheduled monument known as [Druim Dubh, stone circle](#). This monument is deliberately placed in the landscape, on a high ridge. Wind turbine development in close proximity to the monument has the potential to impact on our understanding and appreciation of this element of its setting.



The consented Stornoway wind farm scheme will have a significant impact on the setting of this monument, which is already affected to some degree by modern infrastructure. However, the proposed scheme has the potential to increase these impacts considerably. If this is the case, it would increase an impact which we consider to be significant and adverse.

The greatest impact of the consented Stornoway wind farm on the stone circle is that of turbines 28 and 30. The currently proposed scheme includes two turbines, 7 and 8, which are closer to the stone circle. They also have a greater height to tip, and sit on higher ground. These factors combined mean that it appears likely that these turbines will increase the adverse impact on the stone circle's setting.

We therefore strongly recommend that potential mitigation is explored, aiming to reduce this impact to a level where it is not considered significant. It appears likely that a considerable reduction in this impact could be achieved by the removal of turbines 7 and 8 from the scheme, or their relocation elsewhere within the development boundary.

It would be very helpful if we had the opportunity to comment on the scheme layout as it evolves through the design process. In particular, we would like to comment on possible reductions in the impact on Druim Dubh stone circle. In order to do this, draft visualisations would probably be necessary. We would welcome any further pre-application consultation from the developer, particularly if they could provide these details to us.

We also consider it likely that there will be significant impacts on the Inventory garden and designed landscape known as [Lews Castle and Lady Level Park](#). We recognise that the consented Stornoway wind farm scheme will have an adverse impact on the designed landscape.

At this stage, it is not possible to tell whether the altered scheme will increase this impact significantly. We would therefore also welcome further pre-application consultation on this, including visualisations where possible. The developer should seek to reduce these impacts where possible, and we recommend that the setting of the designed landscape should be considered as a key consideration in the overall design of the scheme.

There is the potential for other impacts on our interests to be significant, and we welcome the undertaking in the scoping report to agree a finalised list of assets for assessment with us.

Historic Environment Scotland
10 August 2018

Park C (Christopher)

From: Anne Phillips <APhillips@hial.co.uk> on behalf of Safeguarding <Safeguarding@hial.co.uk>
Sent: 20 August 2018 16:14
To: Park C (Christopher)
Subject: RE: Scoping Opinion - Stornoway Wind Farm, Isle of Lewis

Follow Up Flag: Follow up
Flag Status: Flagged

Your Ref: ECU00000646 – Stornoway Wind Farm
HIAL Ref: 2018/0086/SYY

Dear Sir/Madam,

PROPOSAL: Scoping request for proposed 36 application, Stornoway Wind Farm. Revised wind farm comprising 33 turbines (25 with blade tip height of 187m, 8 with blade tip height of 155m).
LOCATION: Approx 1.5km West of Stornoway, Isle of Lewis

This development falls inside the safeguarded areas for **Stornoway Airport**. The turbines would present a significant infringement to the safeguarded area.

The Civil Aviation Authority (CAA) expects HIAL to provide evidence that the safety of Air Traffic Provision would not be compromised or degraded by the development and a safety case/full assessment would need to be submitted to them. This would require more detailed work to be undertaken and will incur a cost. Therefore, HIAL would look to pass any charges incurred onto the developer.

This process was undertaken for the previous consent to the windfarm. However, due to the change in layout and significant increase in turbine height, a separate safety case will be required. Due to the height of the proposed development, as a minimum, aviation warning lights of 200 candela would be required at the hub height of all turbines.

It should be noted that HIAL would work with the developer towards a resolution. However, HIAL would **object** to this proposal until a conclusion can be reached with the CAA.

Regards,

Safeguarding Team
Highlands and Islands Airports Limited
Head Office, Inverness Airport, Inverness IV2 7JB
☎ 01667 464244 (DIRECT DIAL)
✉ safeguarding@hial.co.uk 🌐 www.hial.co.uk

Park C (Christopher)

From: JRC Windfarm Coordinations <windfarms@jrc.co.uk>
Sent: 09 August 2018 11:12
To: Econsents Admin
Subject: Scoping Opinion - Stornoway Wind Farm, Isle of Lewis [WF180359]

Dear econsents_admin,

A Windfarms Team member has replied to your coordination request, reference **WF180359** with the following response:

Dear Sir/Madam,

JRC analyses proposals for wind energy developments on behalf of the UK Energy Industry. We assesses the potential of such developments to interfere with radio systems operated by UK and Irish Energy Industry companies in support of their regulatory operational requirements.

The Energy Industry considers that any wind energy development within:

- * 1000m of a link operating below 1GHz; or*
- * 500m of a link operating above 1GHz, requires detailed coordination.*

For turbines with a blade diameter of 32m or less this distance is reduced to:

- * 500m for links below 1GHz; and*
- * 300m for links above 1GHz before a detailed coordination is required.*

There is an EXCLUSION ZONE around most Base Station sites of 500m, i.e. no development is permitted. This will be evaluated on a case by case basis for smaller turbines.

Unfortunately, part (or all) of the proposed development breaches one or more of these limits.

The affected links are:

TURBINE:

*Stornoway Wind Farm (April 2018) T1 hub 105m blades 82m
Grid ref OSGB 134912 931497*

460MHz Telemetry and Telecontrol:

*JESHAKS1 EITSEAL WIG
to JESHAKO2 STORNOWAY*

Microwave Point to Point:

*0929285/1 EITSHAL
to STORNOWAY*

TURBINE:

*Stornoway Wind Farm (April 2018) T2 hub 105m blades 82m
Grid ref OSGB 135246 930907*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKO1 ARNISH MOOR*

*JESHAKS1 EITSEAL WIG
to JESHAKO2 STORNOWAY GRID*

*Microwave Point to Point:
0929285/1 EITSHAL
to STORNOWAY*

*TURBINE:
Stornoway Wind Farm (April 2018) T3 hub 105m blades 82m
Grid ref OSGB 135895 931064*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKO1 ARNISH MOOR*

*JESHAKS1 EITSEAL WIG
to JESHAKO2 STORNOWAY GRID*

*Microwave Point to Point:
0929285/1 EITSHAL
to STORNOWAY*

*TURBINE:
Stornoway Wind Farm (April 2018) T4 hub 105m blades 82m
Grid ref OSGB 136535 931467*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO2 STORNOWAY GRID*

*Microwave Point to Point:
0929285/1 EITSHAL
to STORNOWAY*

*TURBINE:
Stornoway Wind Farm (April 2018) T5 hub 105m blades 82m*

Grid ref OSGB 136800 931025

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKO1 ARNISH MOOR*

*JESHAKS1 EITSEAL WIG
to JESHAKO2 STORNOWAY*

*Microwave Point to Point:
0929285/1 EITSHAL
to STORNOWAY*

*TURBINE:
Stornoway Wind Farm (April 2018) T6 hub 105m blades 82m
Grid ref OSGB 137233 931605*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO2 STORNOWAY GRID*

*Microwave Point to Point:
0929285/1 EITSHAL
to STORNOWAY*

*TURBINE:
Stornoway Wind Farm (April 2018) T7 hub 105m blades 82m
Grid ref OSGB 137518 931202*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO2 STORNOWAY GRID*

*Microwave Point to Point:
0929285/1 EITSHAL
to STORNOWAY*

*TURBINE:
Stornoway Wind Farm (April 2018) T8 hub 105m blades 82m
Grid ref OSGB 138079 931143*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKO2 STORNOWAY GRID*

*Microwave Point to Point:
0929285/1 EITSHAL
to STORNOWAY*

*TURBINE:
Stornoway Wind Farm (April 2018) T9 hub 105m blades 82m
Grid ref OSGB 138050 931752*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO2 STORNOWAY*

*Microwave Point to Point:
0929285/1 EITSHAL
to STORNOWAY*

*TURBINE:
Stornoway Wind Farm (April 2018) T10 hub 105m blades 82m
Grid ref OSGB 138463 932490*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO2 STORNOWAY*

*Microwave Point to Point:
0929285/1 EITSHAL
to STORNOWAY*

*TURBINE:
Stornoway Wind Farm (April 2018) T11 hub 105m blades 82m
Grid ref OSGB 138217 933061*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO2 STORNOWAY GRID*

*JESHCCS1 BATTERY PT
to JESHCCO3 PHENTLAND RD*

*TURBINE:
Stornoway Wind Farm (April 2018) T12 hub 105m blades 82m
Grid ref OSGB 138512 933966*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO4 COLL SS*

*JESHCCS1 BATTERY PT 33KV (LEWIS) GB 143200 932200
to JESHCCO3 PHENTLAND RD WF (LEWIS) GB 137600 934200*

*TURBINE:
Stornoway Wind Farm (April 2018) T13 hub 105m blades 82m
Grid ref OSGB 138728 934704*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO4 COLL SS*

*JESHCCS1 BATTERY PT
to JESHCCO3 PHENTLAND RD*

*TURBINE:
Stornoway Wind Farm (April 2018) T14 hub 105m blades 82m
Grid ref OSGB 138660 935274*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO4 COLL SS*

*TURBINE:
Stornoway Wind Farm (April 2018) T15 hub 105m blades 82m
Grid ref OSGB 139269 935736*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKO4 COLL SS*

*TURBINE:
Stornoway Wind Farm (April 2018) T16 hub 105m blades 82m
Grid ref OSGB 138719 935884*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKO4 COLL SS*

*TURBINE:
Stornoway Wind Farm (April 2018) T17 hub 105m blades 82m
Grid ref OSGB 138069 935727*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO4 COLL SS*

*TURBINE:
Stornoway Wind Farm (April 2018) T18 hub 105m blades 82m
Grid ref OSGB 137469 935215*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO4 COLL SS*

*JESHCCS1 BATTERY PT
to JESHCCO3 PHENTLAND RD*

*TURBINE:
Stornoway Wind Farm (April 2018) T19 hub 105m blades 82m
Grid ref OSGB 136859 935205*

460MHz Telemetry and Telecontrol:

*JESHAKS1 EITSEAL
to JESHAKO4 COLL SS*

*TURBINE:
Stornoway Wind Farm (April 2018) T20 hub 105m blades 82m
Grid ref OSGB 136220 934979*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKO4 COLL SS*

*TURBINE:
Stornoway Wind Farm (April 2018) T21 hub 105m blades 82m
Grid ref OSGB 137450 932746*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKO2 STORNOWAY GRID*

*TURBINE:
Stornoway Wind Farm (April 2018) T22 hub 105m blades 82m
Grid ref OSGB 136682 932687*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKO2 STORNOWAY GRID*

*TURBINE:
Stornoway Wind Farm (April 2018) T23 hub 105m blades 82m
Grid ref OSGB 136033 932835*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL
to JESHAKO4 COLL SS*

TURBINE:

*Stornoway Wind Farm (April 2018) T24 hub 105m blades 82m
Grid ref OSGB 135551 932107*

460MHz Telemetry and Telecontrol:

JESHAKS1 EITSEAL WIG

to JESHAKO2 STORNOWAY GRID

JESHAKS1 EITSEAL WIG

to JESHAKO4 COLL SS

TURBINE:

*Stornoway Wind Farm (April 2018) T25 hub 105m blades 82m
Grid ref OSGB 136181 931959*

460MHz Telemetry and Telecontrol:

JESHAKS1 EITSEAL WIG

to JESHAKO2 STORNOWAY GRID SS

TURBINE:

*Stornoway Wind Farm (April 2018) T26 hub 105m blades 82m
Grid ref OSGB 136938 932097*

460MHz Telemetry and Telecontrol:

JESHAKS1 EITSEAL WIG

to JESHAKO2 STORNOWAY GRID

TURBINE:

*Stornoway Wind Farm (April 2018) T27 hub 105m blades 82m
Grid ref OSGB 137725 932254*

460MHz Telemetry and Telecontrol:

JESHAKS1 EITSEAL WIG

to JESHAKO2 STORNOWAY GRID

TURBINE:

*Stornoway Wind Farm (April 2018) T28 hub 105m blades 82m
Grid ref OSGB 137755 933425*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKE4 COLL SS*

*JESHCCS1 BATTERY PT
to JESHCCO3 PHENTLAND RD*

*TURBINE:
Stornoway Wind Farm (April 2018) T29 hub 105m blades 82m
Grid ref OSGB 137322 933877*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKE4 COLL SS*

*JESHCCS1 BATTERY PT
to JESHCCO3 PHENTLAND RD*

*TURBINE:
Stornoway Wind Farm (April 2018) T30 hub 105m blades 82m
Grid ref OSGB 136584 934477*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG (LEWIS) GB 130500 930400
to JESHAKE4 COLL SS (LEWIS) GB 147500 940100*

*TURBINE:
Stornoway Wind Farm (April 2018) T31 hub 105m blades 82m
Grid ref OSGB 137282 934497*

*460MHz Telemetry and Telecontrol:
JESHAKS1 EITSEAL WIG
to JESHAKE4 COLL SS*

*JESHCCS1 BATTERY PT
to JESHCCO3 PHENTLAND RD*

*TURBINE:
Stornoway Wind Farm (April 2018) T32 hub 105m blades 82m*

Grid ref OSGB 138030 934949

460MHz Telemetry and Telecontrol:

JESHAKS1 EITSEAL WIG

to JESHAKE4 COLL SS

JESHCCS1 BATTERY PT 33KV

to JESHCCO3 PHENTLAND RD

TURBINE:

Stornoway Wind Farm (April 2018) T33 hub 105m blades 82m

Grid ref OSGB 138138 934310

460MHz Telemetry and Telecontrol:

JESHAKS1 EITSEAL WIG (LEWIS) GB 130500 930400

to JESHAKE4 COLL SS (LEWIS) GB 147500 940100

JESHCCS1 BATTERY PT 33KV (LEWIS) GB 143200 932200

to JESHCCO3 PHENTLAND RD WF (LEWIS) GB 137600 934200

Microwave Point to Point:

0929285/1 EITSHAL

to STORNOWAY

Links licensed to :- The Local Electricity Utility

As a consequence JRC **OBJECTS** to the proposed wind turbine/wind farm on behalf of The Local Electricity Utility and itself. As this document is likely to be in the public domain, link end grid references have been omitted from this objection.

Unfortunately no link details apart from the link identifiers can now be supplied due to persistent breaches in confidentiality. This can be reviewed on a case by case basis and may require a non-disclosure agreement to be drawn up. However, JRC are still willing to work with developers in order to clear as many turbines as possible, including those that may initially fall within the coordination zone. For more information about what to do next, please click [Objections: What to do next](#).

Please note that the developer of this site is currently (Aug 2018) in discussion with JRC in respect of mitigation options. Until this is complete and any mitigation options have been agreed with the local electricity utility, JRC will maintain its objection.

The JRC objection shall be withdrawn after simple analysis shows no issues; when a satisfactory coordination has been achieved and the zone of protection is implemented; or when an appropriate mitigation agreement is in place.

NOTE:

The protection criteria determined for Energy Industry radio systems can be found at <http://www.jrc.co.uk/wind-farms/>

Regards

Wind Farm Team

*The Joint Radio Company Limited
Delta House
175-177 Borough High Street
LONDON
SE1 1HR
United Kingdom*

Office: 020 7706 5199

*JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.
Registered in England & Wales: 2990041
<http://www.jrc.co.uk/about-us>*

JRC is working towards GDPR compliance. We maintain your personal contact details in accordance with GDPR requirements for the purpose of "Legitimate Interest" for communication with you. However you have the right to be removed from our contact database. If you would like to be removed, please contact anita.lad@jrc.co.uk.

We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email keeping the subject line intact or login to your account** for access to your coordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?auth=o1xkmcaaaeigaaaa9WpLjNXpMlrIZg%3D%3D>

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T: +44 (0)131 2442900
DD: +44 (0) 131 2440053 e-mail: [REDACTED]@gov.scot

Mr Christopher Park
Energy Consents Unit
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Our ref: FL/60-7

August 16th 2018

Dear Christopher,

STORNOWAY WIND FARM, STORNOWAY, ISLE OF LEWIS

Thank you for seeking comment from Marine Scotland Science (MSS) on the scoping report for the proposed Stornoway wind farm.

The proposed development area is drained by watercourses supporting salmon, trout and eel populations and consists of a large number of water-bodies and extensive peat deposits. To ensure protection of these fish species, of high economic and high conservation value (salmon is listed in the European Habitats Directive; salmon, trout and European eel are listed as priority species for conservation in the Scottish Biodiversity List; and European eel is also protected under EU regulation (EC No 1100/2007)), in a potentially sensitive environment, MSS highlights a number of issues below for the developer to consider.

We welcome the intention of the developer to carry out up to date electrofishing and hydrological surveys; we recommend such site characterisation surveys to include fully quantitative electrofishing which can provide an accurate enumeration of fish populations and can therefore be used for temporal and spatial comparisons, we further recommend a suite of hydrochemical parameters to be measured over a range of flows e.g. pH, alkalinity, ANC, DOC, nitrates, phosphates, aluminium (particularly if the area is prone to acidification) turbidity and flow data. Information from these site characterisation surveys will allow an assessment of the presence and abundance of fish species and the water quality from which

appropriate site specific mitigation measures can be drawn up and to establish a robust integrated hydrochemical, macroinvertebrate (macroinvertebrate sampling can provide additional information in relation to water quality which may not be measured with spot hydrochemical sampling) and fish population monitoring programme to monitor water quality and fish populations at sites likely to be impacted throughout the development period. Control sites, where an impact is unlikely, should also be selected, thereby allowing potential impacts associated with the development to be differentiated from non-developmental impacts e.g. climatic. The monitoring programme should be carried out at least 12 months prior to construction commencing, during construction and for at least 12 months after construction is complete. The latter time period is dependent on the results collected during the construction phase. Further sampling may be required one to two years prior to decommissioning taking place. Additional information regarding fish and water quality survey/monitoring associated with wind farm developments (e.g. identification of threshold levels, a reporting mechanism, an action plan, should a problem occur throughout the development, and regular visual inspections of all watercourses carried out by an appointed Ecological Clerk of Works) can be found at the following web site

<https://www.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>.

The potential cumulative impact on water quality and fish populations as a result of the present proposal and adjacent developments e.g. wind farms, fish hatchery/harvesting station (operational and proposed) should be considered, particularly in the selection of control sites.

We encourage the developer to ensure that the movement of fish is included in the design of all watercourse crossings and that The Forests and Water UK Forestry Standard Guidelines is consulted should felling be carried out.

In summary, MSS recommends the developer to carry out the following and present the results and/or details in the Environmental Impact Assessment Report:

- site characterisation surveys; fully quantitative electrofishing surveys and hydrochemical (including turbidity and flow data) sampling, to assess fish populations and water quality;
- to draw up appropriate site specific mitigation measures; and

- to establish a robust integrated hydrochemical, macroinvertebrate and fish monitoring programme before, during and after construction.

Kind regards,

Dr Emily E. Bridcut



Defence Infrastructure Organisation

Claire Duddy
Assistant Safeguarding Officer
Ministry of Defence
Safeguarding – Wind Energy
Kingston Road
Sutton Coldfield
West Midlands B75 7RL
United Kingdom

Your Reference: Stornoway Wind Farm

Our Reference: DIO10043854

Telephone [MOD]: +44 (0)121 311 2143

Facsimile [MOD]: +44 (0)121 311 2218

E-mail: [REDACTED] mod.gov.uk

Christopher Park
The Scottish Government

14th August 2018

Dear Mr Park

Scoping Opinion Request for proposed Section 36 Application Stornoway Wind Farm

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping pinion Request in your communication dated 19th July 2018.

I am writing to tell you that the MOD has no objection to the proposal.

The application is for 33 turbines at a maximum of 187 metres to blade tip. This has been assessed using the grid references below as submitted in the planning application or in the developers' or your pro-forma.

Turbine	Easting	Northing
1	134912	931497
2	135246	930907
3	135895	931064
4	136535	931467
5	136800	931025
6	137233	931605
7	137518	931202
8	138079	931143
9	138050	931752
10	138463	932490
11	138217	933061
12	138512	933966
13	138704	934704
14	138660	935274
15	139269	935736
16	138719	935884
17	138069	935727
18	137469	935215
19	136859	935205
20	136220	934979
21	137450	932746
22	136682	932687
23	136033	932835

24	135551	932107
25	136181	931959
26	136938	932097
27	137725	932254
28	137755	933425
29	137322	933877
30	136584	934477
31	137282	934497
32	138030	934949
33	138138	934310

In the interest of aviation safety the MOD requests that the cardinal turbines (turbines 1, 8, 10, 16 and 20) are fitted with MOD accredited combination 25 candela omni-directional red lighting and infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point. The remaining perimeter turbines should be fitted with 25 candela omni-directional lighting or infrared lighting to the same specification as previously stated.

The principal safeguarding concern of the MOD with respect to the development of wind turbines relates to their potential to create a physical obstruction to air traffic movements and cause interference to Air Traffic Control and Air Defence radar installations.

Defence Infrastructure Organisation Safeguarding wishes to be consulted and notified of the progression of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests.

If planning permission is granted we would like to be advised of the following prior to commencement of construction;

- the date construction starts and ends;
- the maximum height of construction equipment;
- the latitude and longitude of every turbine.

This information is vital as it will be plotted on flying charts to make sure that military aircraft avoid this area.

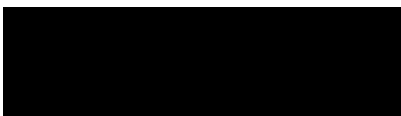
If the application is altered in any way we must be consulted again as even the slightest change could unacceptably affect us.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely



Claire Duddy
Assistant Safeguarding Officer – Wind Energy
Defence Infrastructure Organisation

SAFEGUARDING SOLUTIONS TO DEFENCE NEEDS

From: [NATS Safeguarding](#)
To: [Park C \(Christopher\)](#)
Subject: RE: Scoping Opinion - Stornoway Wind Farm, Isle of Lewis [Our Ref: SG26584]
Date: 25 July 2018 11:33:29
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.gif](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

We refer to the application above. The proposed development has been examined by our technical safeguarding teams. In the timeframe given to us we have been unable to thoroughly investigate the effects of the proposed development on our Operations, however, the relevant teams are being consulted.

Based on our preliminary technical findings, the proposed development does conflict with our safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal. We will notify you within 4-6 weeks of the results of our operational assessment. Only if this assessment shows the impact to be acceptable will we be able to withdraw our objection.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission for a wind farm. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are further obliged to notify both NATS and the Civil Aviation Authority ("CAA") of that fact (which may lead to the decision made being subject to review whether by the CAA referring the matter for further scrutiny or by appropriate action being taken in the courts).

As this further notification is intended to allow the CAA sufficient time to consider whether further scrutiny is required, we understand that the notification should be provided prior to any granting of permission. You should be aware that a failure to consult NATS, or to take into account NATS's comments when deciding whether to approve a planning application, could cause serious safety risks for air traffic.

If you have any queries regarding this matter you can contact us using the details as below.

Yours faithfully



NATS Safeguarding

D: 01489 444687

E: NATSSafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



****Please note:** We have recently made some changes to our mailbox structure, I would be grateful if you could delete previous instances of our email address (e.g. in outlook email address auto-fill) and re-typing NATSSafeguarding@nats.co.uk to ensure that the correct inbox is picked up



Robin Reid
Outer Hebrides Conservation Officer
RSPB Scotland
Talla na Mara
Pairc Nieaboist
Isle of Harris
HS3 3AE

Chris Park
Energy Consents
Directorate for Energy and Climate Change
Scottish Government
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

22nd August 2018

Dear Chris

**SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION
STORNOWAY WIND FARM, APPROXIMATELY 1.5KM WEST OF THE TOWN OF
STORNOWAY, ISLE OF LEWIS**

Thank you for consulting RSPB Scotland with regard to the above Scoping Opinion request. We wish to comment on the proposals for assessing the ornithological impacts of the development.

We note that the previous bird survey work covering the entire development area which was presented in the environmental statement for the original application was undertaken in 2009 and 2010. Whilst this data forms a useful background reference to inform surveys for the proposed development, the previous survey findings are now out of date and we are aware that there have been several significant changes in bird use and distribution over the site since this survey work was undertaken.

SNH guidance¹ states that extensions or revisions of previous proposals should be treated in exactly the same way as new proposals with regard to assessing the impact on birds and that data used to inform EIA should have been collected within the last 5 years. The same guidance also recommends that a minimum of two years of survey work should be carried out, particularly in sensitive bird areas and where there is a risk that developments could have an impact on designated sites. Several of the species of conservation concern listed as being present on the site in paragraph 7.3.14 of the scoping report are known to use alternative nest sites between years that can be several kilometres apart and therefore the usage of a given area can vary significantly between years. Taking into account the number of species of conservation concern using the site, known changes in usage since 2010, the size of the site, its proximity to the Lewis Peatlands Special Protection Area (SPA) and the age of the existing data, we strongly consider that two full years of survey work across the whole site should be required. We note that new survey work was undertaken in 2015/16 but this only covered part of the site and there was then a break in survey between August 2016 and October 2017 when survey work resumed across the entire site. We recommend that this survey work continues for a full two years, so until September 2019.

Changes in bird use and distribution across the site since 2010

The significant changes that we are aware of since 2010 are the colonisation of the site by a breeding and wintering hen harrier population, a significant increase in the white-tailed eagle population across Lewis, and an increase in the Lewis golden eagle population, with one pair nesting approximately 1km from the site boundary in 2016.

Hen harriers were first recorded breeding on the site in 2015 and the population has since increased to a minimum of five pairs breeding on or within 2km of the site². This hen harrier population is regionally significant in that the breeding attempts and communal roost sites recorded in the Stornoway Wind Farm area are the first known on the Isle of Lewis. There have been several hen harrier collisions at wind farms in Scotland and recent work has shown that the species spends a significant amount of flight time within the rotor swept height band of large wind turbines, particularly during displaying flight.

Hen harriers are red-listed in Birds of Conservation Concern ⁴³. They are afforded the highest degree of legal protection under Schedules 1 and 1A of the Wildlife and Countryside Act 1981 and Annex 1 of the EU Birds Directive. Article 4 of the Birds Directive requires that Annex 1 species shall be the subject of “special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution.” Those measures should

¹ Scottish Natural Heritage (2014) Recommended bird survey methods to inform impact assessment of onshore wind farms. SNH Guidance, Box 1. SNH, Battleby

² The SNH 2014 guidance states that surveys for hen harrier should extend to a 2km radius beyond the proposal site.

³ www.rspb.org.uk/birds-and-wildlife/wildlife-guides/uk-conservation-status-explained/

include taking development management decisions with due regard to the species' conservation. Such decisions can also contribute to the "requisite measures" taken by Member States to secure the objectives of Articles 2 and 3: to maintain the populations all wild bird species at a favourable conservation status and preserve, maintain or restore sufficient habitats for those species.

White-tailed eagles have increased significantly across Lewis and Harris from eight pairs in 2010 to a minimum of 26 pairs in 2018. The species remains a rare breeding species across Scotland with approximately 115 occupied territories recorded in 2017, and the Lewis and Harris population is nationally important for the species. Since 2010 two pairs of white tailed eagles have established in the Stornoway area. White-tailed eagles range over large areas, and the usage of the site by adult and immature birds is likely to have increased significantly.

The Lewis and Harris golden eagle population increased from 51 pairs to 69 pairs between 2003 and 2015. This population is one of the densest breeding populations recorded in Europe and as the population has increased, the amount of activity by adult and immature birds is likely to have increased over the wind farm site. In 2016, the closest pair to the west of the site used a previously unknown alternative nest site, approximately 1km from the site boundary, much closer than the previously known nest sites which are 3-4 km from the site.

We are also aware that in spring 2018, the remains of an adult golden eagle were found at the base of one of the Pentland Road turbines. The circumstances of this discovery suggest that the golden eagle is likely to have been killed through collision with a turbine. This is the first suspected golden eagle death resulting from a wind turbine collision in Scotland and highlights the risk of further fatal collisions to golden eagles in this area where the population occurs at a high density.

EIA survey methods, mitigation and monitoring

With the exception of the duration of the surveys proposed, the survey methods described in the Scoping Report appear to be appropriate and sufficient in order to assess impacts on ornithology. However, it is particularly important to ensure focal watches are undertaken at hen harrier breeding areas during the early breeding season period (April and May), when they are prospecting and engaging in display flight at height. It is during this period when they are likely to be most susceptible to collisions and when all Scottish hen harrier collisions to date have been recorded.

The EIA report should also consider and detail mitigation measures (such as exclusion or re-siting of proposed turbines, habitat restoration and creation of compensatory or offsetting habitat) to avoid or minimise impacts on birds. For hen harrier, eagle species and diver species, two years of data are likely to show patterns in activity around breeding sites, foraging areas and roost sites and these findings should be used to inform the locations and number of turbines and identification of mitigation to minimise impacts. For hen harriers, turbine shut-down for periods in areas where birds are particularly susceptible to collisions early in the breeding

season (April – May) should also be considered to minimise collision risk. Buffers around nest sites, free of turbines and other infrastructure, should also be considered and proposed in order to prevent displacement of birds. Whitfield et al ⁴ advise a disturbance free buffer of 500-750m around hen harrier nest sites. Several proposed turbine locations shown in Figure 2.2 of the Scoping Report are within a few hundred meters of hen harrier nest sites⁵.

Anecdotal post construction observations at the Pentland Road windfarm suggest that rabbits have colonised the edges of access tracks since construction and that this has attracted golden eagles to forage close to turbines. This could lead to greater collision risk to golden eagles. It is important that potential effects such as this arising from the development are carefully considered so that impacts on birds are minimised and mitigated where possible. Timing of construction should also be considered and detailed in the EIA report to avoid disturbance during the breeding season. RSPB Scotland would be happy to discuss potential mitigation with the applicant/consultant.

The EIA report should also detail monitoring that would be undertaken during construction and operation in order to verify the predictions of the EIA, ensure compliance with conditions, and so that further mitigation measures can be identified if necessary. The methods for collision risk assessment in particular are based on assumed avoidance rates for which there is little empirical evidence. It is important that developers contribute to increasing the certainty with which impacts can be predicted for future developments. The SNH 2014 guidance recommends (in paragraph 3.6) that for wind farms over 50MW, a comparable control or reference site should be selected and surveyed at the time of the initial surveys, to allow post construction monitoring.

We advise that the cumulative impact assessment must take full account of the new SNH (2018) guidance on “Assessing the cumulative impacts of onshore wind farm developments on birds.” The cumulative impact assessment should consider displacement and barrier effects as well as collision risk, in line with the SNH guidance.

Yours Sincerely

Robin Reid

RSPB Conservation Officer

Tel - 01859 550 280

Mobile - Redacted

⁴ Whitfield,D.P., Ruddock, M., and Bullman, R. (2008) Expert opinion as a tool for quantifying bird tolerance to human disturbance. *Biological Conservation*, 141: 2708-2717.

⁵ This is also the distance recommended in SNH (2014) Implications of Additional Protection for Hen Harrier, Red Kite and Golden Eagle under Schedules A1 & 1A of the Wildlife and Countryside Act (1981).

27th July 2018



Comhairle nan Eilean Siar
Lewis & Harris Sandwich Road
Stornoway
Isle of Lewis
HS1 2BW

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Steps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk

Dear Local Planner,

**HS2 Isle of Lewis Stornoway SW town of
PLANNING APPLICATION NUMBER: ECU00000646**

OUR REFERENCE: 764067

PROPOSAL: 33 wind turbines and associated infrastructure. 24 turbines with a blade to tip height of up to 187m and a rotor diameter of up to 164m, while the remaining nine would have a blade to tip height of up to 155m and rotor diameter of 135m.

Please quote our reference in all future correspondence

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

Water

- There is currently sufficient capacity in the North Lochs Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

Foul

- There is currently sufficient capacity in the Stornoway Waste Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

Infrastructure within boundary

According to our records, the development proposals impact on existing Scottish Water assets.

The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team directly at service.relocation@scottishwater.co.uk.

The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.

Scottish Water Disclaimer

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not normally accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes:

- **Scottish Water asset plans can be obtained from our appointed asset plan providers:**

Site Investigation Services (UK) Ltd
Tel: 0333 123 1223
Email: sw@sisplan.co.uk
www.sisplan.co.uk

- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area then they should write to the Customer Connections department at the above address.
- If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.
- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.
- **Please find all of our application forms on our website at the following link <https://www.scottishwater.co.uk/business/connections/connecting-your-property/new-development-process-and-applications-forms>**

Next Steps:

- **Single Property/Less than 10 dwellings**
For developments of less than 10 domestic dwellings (or non-domestic equivalent) we will require a formal technical application to be submitted directly to Scottish Water or via the chosen Licensed Provider if non domestic, once full planning permission has been granted. Please note in some instances we will require a Pre-Development Enquiry Form to be submitted (for example rural location which are deemed to have a significant impact on our infrastructure) however we will make you aware of this if required.
- **10 or more domestic dwellings:**
For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.

Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

- **Non Domestic/Commercial Property:**
Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened up to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider

to act on their behalf for new water and waste water connections. Further details can be obtained at www.scotlandontap.gov.uk

- **Trade Effluent Discharge from Non Dom Property:**

Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.

If you are in any doubt as to whether or not the discharge from your premises is likely to be considered to be trade effluent, please contact us on 0800 778 0778 or email TEQ@scottishwater.co.uk using the subject "Is this Trade Effluent?". Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found using the following link <https://www.scottishwater.co.uk/business/our-services/compliance/trade-effluent/trade-effluent-documents/trade-effluent-notice-form-h>

Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.

For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas so the development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.

The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer. Further information can be found at www.resourceefficientscotland.com

If the applicant requires any further assistance or information, please contact our Development Operations Central Support Team on 0800 389 0379 or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Calum Rodger

Development Operations Technical Analyst

Redacted scottishwater.co.uk

Chris Park
Energy Consents

By email only to: Econsents_Admin@gov.scot

31 July 2018

Dear Mr Park

The Electricity Act 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Stornoway Wind farm

Approximatley 1.5 km west of the town of Stornoway, Isle of Lewis

Thank you for consulting SEPA on the scoping opinion for the above development proposal by your email received on 20 July 2018. We would welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter.

Advice to the planning authority

We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To **avoid delay and potential objection**, the information outlined below and in the attached appendix must be submitted in support of the application.

- a) Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment and details of any related CAR applications.
- b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTE) and buffers.
- c) Map and assessment of impacts upon groundwater abstractions and buffers.
- d) Peat depth survey and table detailing re-use proposals.
- e) Map and table detailing forest removal.
- f) Map and site layout of borrow pits.

- g) Schedule of mitigation including pollution prevention measures.
- h) Borrow Pit Site Management Plan of pollution prevention measures.
- i) Map of proposed surface water drainage layout.
- j) Map of proposed water abstractions including details of the proposed operating regime.
- k) Decommissioning statement.

Further details on these information requirements and the form in which they must be submitted can be found in the attached appendix. We also provide site specific comments in the following section which can help the developer focus the scope of the assessment.

1. Site specific comments

- 1.1 In relation to direct impacts on the water environment then turbines and other infrastructure should be located to ensure a suitable buffer between the top of the banks of watercourses and lochs and excavations; this is usually a minimum of 50m. In relation to the layout outlined in the scoping report the following modifications would be required:
 - Turbine 9 should be relocated to ensure a suitable buffer to the top of the bank of the Feadan Loch Lochan;
 - Turbine 14 should be relocated to ensure a suitable buffer to the top of the bank of Allt Hogaraid;
 - Turbine 28 will need to avoid the local bog pools;
 - Turbine 29 may need to be relocated further away from the Allt Greidaig to ensure that there are no high risk excavations in the functional flood plain.
- 1.2 We thank the developer for including existing peat probing information in the scoping report. Due to the change in layout from the existing consent then more peat probing data, in line with section 3 of the appendix, will be required prior to determination. The peat probing information should be used to ensure that the scheme that comes forward minimises impacts on deep peat; this should include reassessing aspects of the scheme layout which already has consent. Once it's been demonstrated that the layout minimises impacts on peat as much as possible mitigation measures such as floating track and piling should be implemented (and all shown on a plan). The application should include peatland restoration proposals to help compensate for the peat disturbance caused by the development; this could include for example, restoration of local peat cuttings, if they do not have a cultural or historic interest. This could form part of the proposed Habitat Management Plan, a draft of which should be included in the submission.
- 1.3 Careful consideration will need to be given to the layout of the tracks that connect the turbines as these can have just as significant an effect on the aspects of the environment in which we have an interest as the turbines. The track should be demonstrated to be as short as possible and we are unlikely to support excessive use of spurs for example.
- 1.4 We are content with the proposal that no new National Vegetation Classification data is collected but that the presentation of the data will take into consideration our updated GWDTE guidance. We welcome the proposal for this information to form a separate appendix. See section 4 in the appendix for further detail on our GWDTE requirements.
- 1.5 In relation to flood risk we welcome the commitment that all crossing will be oversized to accommodate at least the 1 in 200 year flood event. In most cases we will be content for this element to be conditioned, however the EIA Report should include a flood risk assessment for the larger crossings such as of the Abhainn Ghrioda and Abhainn a;Ghlinn

Mhoir, accompanied by supporting drawings of the proposed structures and approaching tracks, so the full scale of the engineering works required is understood.

- 1.6 Turbine 12 and 33 are in close proximity to Bennadrove Landfill site. The EIA Report should include an assessment of the potential impacts of the development on the landfill and in particular on groundwater flows and pollutant pathways in this area, if necessary outlining proposed mitigation and monitoring. The council can provide information on operation and historic use and on request we can provide information in relation to our licencing of the site. Due to our involvement with the landfill site we are aware of very deep peat in the vicinity of Turbine 33, and if this is the case where infrastructure is proposed then it should be relocated.
- 1.7 Information should be provided on the bunding and drainage proposals from the battery storage facilities.
- 1.8 We would welcome further pre-application discussion with the developer on this project prior to the application being submitted. We would especially welcome consultation on layout proposals and assessment results in relation to GWDTE and peat.

Regulatory advice for the applicant

2. Regulatory requirements

- 2.1 Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).
- 2.2 Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.
- 2.3 A CAR construction site licence will be required for management of surface water run-off from the construction site. See SEPA's [Sector Specific Guidance: Construction Sites \(WAT-SG-75\)](#) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.
- 2.4 Details of regulatory requirements and good practice advice for the applicant 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 regulatory services team in your local SEPA office at: 2 James Square, James Street, Stornoway, Isle of Lewis, HS1 2QN - Tel: 01851 706477.

Should you wish to discuss this letter please do not hesitate to contact me on 01349 860359 or planning.dingwall@sepa.org.uk.

Yours sincerely

Susan Haslam
Senior Planning Officer
Planning Service

ECopy to: Redacted [@gov.scot](#)

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. Further information on our consultation arrangements generally can be found on our [website planning pages](#).

Appendix 1: Detailed scoping requirements

This appendix sets out our scoping information requirements. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site in order **to avoid delay and potential objection**.

If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

We would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

1. Site layout

- 1.1 All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.

2. Engineering activities which may have adverse effects on the water environment

- 2.1 The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:
 - a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.
 - b) A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works.
 - c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.
- 2.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.
- 2.3 Further advice and our best practice guidance are available within the water [engineering](#) section of our website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#).
- 2.4 Refer to Appendix 2 of our [Standing Advice](#) for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk

Assessment must be submitted in support of the planning application. Our [Technical flood risk guidance for stakeholders](#) outlines the information we require to be submitted as part of a Flood Risk Assessment. Please also refer to [Controlled Activities Regulations \(CAR\)](#) [Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

3. Disturbance and re-use of excavated peat and other carbon rich soils

- 3.1 Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments must aim to minimise this release."
- 3.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂ and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.
- 3.3 The submission must include:
 - a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.
 - b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.
- 3.4 To avoid delay and potential objection proposals must be in accordance with [Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste](#) and our [Developments on Peat and Off-Site uses of Waste Peat](#).
- 3.5 Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.
- 3.6 Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

4. Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)

- 4.1 GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:
 - a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.

- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.

4.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice and the minimum information we require to be submitted.

5. Existing groundwater abstractions

5.1 Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

- a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

5.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice on the minimum information we require to be submitted.

6. Forest removal and forest waste

6.1 Key holing must be used wherever possible as large scale felling can result in large amounts of waste material and in a peak release of nutrients which can affect local water quality. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible.

6.2 Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include:

- a) A map demarcating the areas to be subject to different felling techniques.
- b) Photography of general timber condition in each of these areas.
- c) A table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site.
- d) A plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan. Further guidance on this can be found in [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#).

7. Borrow pits

7.1 Scottish Planning Policy states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The submission must provide sufficient information to address this policy statement.

7.2 In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 [Controlling the Environmental Effects of Surface Mineral Workings](#) (PAN 50) a Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit:

- a) A map showing the location, size, depths and dimensions.
- b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.
- c) You need to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.
- d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.
- e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.
- f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.
- g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily.
- h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO₂.
- i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.
- j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.

8. Pollution prevention and environmental management

8.1 One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. A schedule of mitigation supported by the above site specific maps and plans must be submitted.

These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to [Guidance for Pollution Prevention \(GPPs\)](#).

9. Life extension, repowering and decommissioning

- 9.1 Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with [SEPA Guidance on the life extension and decommissioning of onshore wind farms](#). Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.
- 9.2 The submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing. Further guidance on this may be found in the document [Is it waste - Understanding the definition of waste](#).

Chris Park
Energy Consents Unit
econsents_admin@gov.scot

Your ref: ECU00000646
Our ref: CEA151635

Date: 22 August 2018

Dear Mr Park

**ELECTRICITY ACT 1989 SECTION 36
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017
SCOPING OPINION REQUEST FOR PROPOSED STORNOWAY WIND FARM
REPOWERING**

Thank you for this request for scoping opinion in respect of the above proposed development, and for granting additional time to prepare our response.

This proposal is for an amended version of the consented Stornoway Wind Farm, for which we offered scoping advice on 20 October 2010.

We consider that the scoping report is broadly of a good standard and adequately addresses the issues and appropriate methods for EIA of this development proposal. We endorse what is proposed in the report except where indicated otherwise in this letter.

Landscape and Visual Impacts

We would like to highlight the following key sensitivities for this proposed development that need to be considered through the LVIA, including design of the windfarm:

- The position of the windfarm in relation to both the town of Stornoway and the interior peatlands. It will be important that the windfarm does not seem to impinge upon and/or surround the settlement when seen from key viewpoints within and approaching the town, including from the ferry route. It will also be important that the windfarm does not seem to diminish the characteristic sense of wide open space across the interior peatlands; for example, by being associated with Stornoway yet being seen from the north coast, thereby seeming to reduce the sense of wide open expanse that currently seems to separate these areas.
- The varying local landscape character over the windfarm site. This may mean that the character of the windfarm could also vary over the site and thus create a confusing image with sub-groups.
- The irregular nature of the landform. This may limit the number and position of wind turbines in order to create a simple windfarm image, avoiding variable elevation, spacing, outliers and overlapping of wind turbines within views.

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- The location of roads through the windfarm site along which the receptor sensitivity will be high and the scale of the wind turbines would be emphasised at close proximity to high numbers of receptors. Impacts would be limited significantly if the windfarm development could be restricted to one side of key routes.
- The impact of existing and consented windfarms within the area. The proposal will need to relate to these in character and location to avoid conflicts of design, including wind turbine size.
- The relationship between wind turbine height and the scale of existing features within the landscape. It will be important that the wind turbines do not seem to dominate the prominence of existing vertical features and landmarks such as the Barvas hills, and structures within and surrounding Stornoway, including the Lews Castle.

We agree with the recommendation to scope out impacts on Wild Land Areas. We consider the proposed list of viewpoints to be suitably representative and comprehensive.

Ornithology

The Report asserts that the 2011 ES found no significant effects on ornithological receptors. However, SNH's August 2011 response to that consultation highlights adverse impacts on the integrity of the Lewis Peatlands SPA, attributable to effects on golden eagles and red-throated divers.

The Report notes the ongoing correspondence between the developer and SNH over the extent and scope of bird survey work. In view of the proximity of the Lewis Peatlands SPA and potential usage of the site by the qualifying species of the SPA, we recommend two years' worth of field data should be gathered to inform impacts upon the site, in accordance with our guidance.

Between the 2011 application and current proposal, the only known population of hen harrier in Lewis and Harris has become established within the development site. This represents an important material change in conditions on the site. The latest information on the 2018 breeding season makes clear that the northern part of the development site is not necessarily the most sensitive with respect to hen harriers, with nesting attempts being recorded across the whole area.

This reinforces the importance of having adequate and up to date information upon which to base assessment of impacts, and to inform the development of the layout. For this reason too, we recommend that two years of data gives the best chance of capturing a dataset robust enough to make a sound impact assessment.

Alternatively, the developer would need to justify how a shorter survey period could provide a sufficiently robust basis upon which to inform impact assessment for these highly sensitive receptors, especially the SPA species and the recently established hen harrier breeding population.

We advise that impacts upon the North Harris Mountains SPA and Loch Laxvat SSSI can be scoped out due to lack of connectivity with the development proposal. We agree with the list of the most likely occurring species of conservation concern.

We agree with the approach to Habitats Regulations Appraisal, subject to the advice above about North Harris Mountains SPA.

The ornithology chapter hasn't included plans for post-construction monitoring or carcass searches – it would be appropriate to propose a suitable programme to cover both of these areas post-construction.

Ecology

As discussed with the applicant pre-scoping, we agree that the data previously collected will suffice for assessment of impacts upon freshwater pearl mussel and freshwater invertebrates.

Both Loch Orosay and Stornoway Castle Woodlands SSSIs has been denotified since the 2011 application, so need not be considered further. Achmore Bog SSSI is, in our view, at a distance beyond which we would not expect there to be connectivity with the development.

We agree with the identification of habitats and species of conservation concern to be scoped in.

We note that the now-consented development was considered unlikely to have significant effects on the Lewis Peatlands SAC qualifying habitats. We would expect the proposed HRA screening for the current proposal to arrive at the same conclusion.

Conclusion

As stated above, we consider the scoping report to be comprehensive, and we largely concur with the suggested scoping decisions it presents. We have indicated in this letter some areas where our advice differs from the report. We would be pleased to discuss or clarify these further if that would be helpful

Yours sincerely

MARK MACDONALD

Operations Officer, Argyll & Outer Hebrides

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Chris Park
Energy Consents
Scottish Government
4th Floor, 5 Atlantic Quay
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Glasgow
G2 8LU

Your ref:
ECU00000646

Our ref:
TS00284

Date:
09/08/2018

Econsents_Admin@gov.scot

Dear Sirs,

ELECTRICITY ACT 1989 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION STORNOWAY WIND FARM, APPROXIMATELY 1.5KM WEST OF THE TOWN OF STORNOWAY, ISLE OF LEWIS

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Wood Environment & Infrastructure Solutions UK Ltd in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Trunk Road and Bus Operations (TRBO). Based on the review undertaken, we would provide the following comments.

Development Proposals & Site Location

We understand from the information provided that the applicant intends to submit an application to construct and operate a 33 turbine wind farm located to the southwest of Stornoway on the Isle of Lewis. The site is located some 85km north-west of the nearest trunk road (A835(T)) on the Scottish mainland. Consent was granted by the Scottish Ministers in Spring 2016 for a 36 turbine wind farm at this location. Transport Scotland was consulted on this application and provided comment in a letter dated 9 October 2014.

New Application

The SR indicates that the new application comprises a different layout, with turbine tip heights of approximately 155m and 187m. The SR indicates that turbine components will be transported to the site by sea to the Arnish Point Dockyard.

Given the location of the revised development and its remoteness from the trunk road network, Transport Scotland accepts that the development will not give rise to any significant traffic or related Environmental Impacts on the Trunk Road Network.

In light of the above, we can confirm that Transport Scotland does not require any further assessment of environmental impacts on the trunk road network.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully



John McDonald

**Transport Scotland
Trunk Road and Bus Operations**

cc Alan DeVenny – SYSTRA Ltd.