Lewis Wind Power
Cumhachd Gaoithe

wood.

Stornoway Wind Farm Ltd

Stornoway Wind Farm

Revised Planning Statement

Wood Environment & Infrastructure Solutions UK Limited – January 2020

Report for

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No.	Details	Date
1	Draft	02 04 2019
2	Final	29 April 2019
3	Revised	January 2020

Purpose of this report

This Revised Planning Statement supports an application under section 36 of the Electricity Act 1989 for a wind farm for up to 35 turbines and associated development (the Proposed Development) on land near Stornoway on the Isle of Lewis (the Development Site). It refers to and draws on the findings of an Environmental Impact Assessment (EIA) Report prepared for the application. **AI Chapter 4** of the Additional Information (AI) provides further information on the location of the Proposed Development and its description.

It is material to the application for the Proposed Development that consent has previously been granted for a 36 turbine wind farm and associated development (the 'Consented Development') on the 'Development Site'. The Proposed Development would allow the installation of approximately 196 MW. The Consented Development has an installed capacity of 180MW, therefore the Proposed Development would increase the contribution towards Scotland's target of 100 per cent of electricity production from renewable resources by 2020.

The purpose of this Revised Planning Statement is to provide:

- A justification for the Proposed Development;
- A comparison with the landscape and visual impact assessment of the consented scheme;
- A comparison of the effects on peat with the consented scheme;
- A comparison with the consented scheme in terms of effects on birds where relevant and possible;
- An assessment against relevant energy and planning policies, material considerations and provides a conclusion that demonstrates the need for the Proposed Development;
- A justification that the Proposed Development is sustainable and supported by national policy; and
- Information that the Proposed Development broadly complies with the relevant Local Development Plan and other material considerations, and as a result consent should be granted.

Contents

1. Introduction

1.1 Background

1.1.1 Stornoway Wind Farm Limited (the 'Applicant') is a subsidiary company of Lewis Wind Power Limited. Lewis Wind Power Limited is a joint venture between EDF Renewables Ltd and Amec Project Investments limited in partnership with the Stornoway Trust.

1.1.2 The Applicant submitted an application under section 36 of the Electricity Act 1989 (as amended) to construct and operate a wind farm comprising a maximum of 35 turbines with a generating capacity in excess of 50MW on the site of the Consented Stornoway Wind Farm. The application for the proposed wind farm scheme is hereafter referred to as the 'Proposed Development'. Since the time of the application, consultation has been carried out and responses received. The Applicant submitted an Interim Response Report (IRR) in December 2019 to respond to the consultation process. A copy of this IRR is located in **AI Appendix 3A**.

1.1.3 This revised Planning Statement replaces the Planning Statement submitted in May 2019.

1.1.4 The land on which the 'Development Site' sits (as illustrated in **EIA Figure 1.1, 1.2** of the EIA Report and **AI Figure 4.1** of the Additional Information (AI)) is owned by the Stornoway Trust. This is a community owned charitable trust established in 1923, with responsibility for an area covering some 28,000ha. The population within the Stornoway Trust landholding is approximately 12,000, with 45 crofting townships and some 1,347 crofters within the population. The Stornoway Trust has been a long-standing supporter of the development of a renewable energy industry in the Isle of Lewis and over the past ten years has explored a range of options to stimulate renewable energy projects on its land.

1.1.5 Wood Environment & Infrastructure Solutions UK Limited (Wood E&IS) has been commissioned to prepare this revised Planning Statement. Wood E&IS is one of the UK's largest multidisciplinary environmental and engineering consultancies. The business forms part of a global business supplying consultancy, engineering and project management services. From 12 office locations around the UK, Wood E&IS contribute across the business cycle from policy setting through strategy into implementation, development and operational effectiveness. With skills ranging from development planning and design through an array of environmental and engineering disciplines, the company has a comprehensive service portfolio and applied experience in a wide range of markets.

1.1.6 The Proposed Development falls under Schedule 2 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) (the 'EIA Regulations): a generating station, the construction of which (or the operation of which) will require a section 36 consent but which is not Schedule 1 development. A Schedule 2 development constitutes EIA development if the application is supported by an EIA Report, or if the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location. Due to the size, scale and location of the Proposed Development, the Applicant acknowledged that an EIA is required and the application is accompanied by an EIA Report.

1.2 Planning History

1.2.1 An application was submitted in June 2011 for a wind farm comprising 36 turbines at the Development Site. Section 36 consent and deemed planning permission were granted by the Scottish Ministers in September 2012. In May 2015, an application was made under the Electricity

Act 1989 to amend this consent with regard to the layout, output and size of the wind turbines, with this being granted in March 2016 (the Consented Development). The Stornoway Wind Farm currently has a consented maximum generating capacity of 180MW, with each turbine having an output of up to 5MW and up to 145m tip height.

1.2.2 While the decision on the Consented Development is not legally binding precedent, it is well established that previous decisions are relevant and important considerations where similar issues have been deliberated upon and resolved. The justification for this is, amongst other things, the importance of consistency in the decision-making process. This principle has recently been affirmed again in Gladman Development Ltd v Secretary of State of Housing, Communities and Local Government [2019] EWHC 127 (Admin), drawing on a line of consistent authority going back to North Wiltshire [1993]:

"One important reason why previous decisions are capable of being material is that like cases should be decided in a like manner so that there is consistency in the appellate process. Consistency is self-evidently important to both developers and development control authorities. But it is also important for the purpose of securing public confidence in the operation of the development control system. I do not suggest and it would be wrong to do so, that like cases must be decided alike. An inspector must always exercise his own judgment. He is therefore free upon consideration to disagree with the judgment of another but before doing so he ought to have regard to the importance of consistency and to give his reasons for departure from the previous decision."

1.2.3 Notwithstanding the Proposed Development is different in some respects, it is sufficiently closely related on a number of crucial issues to the Consented Development to suggest that the approach in this case should not diverge materially from the approach taken to the Consented Development.

1.3 Site Description

1.3.1 The Development Site is located approximately 1.5km west of the town of Stornoway, Isle of Lewis (see **Figure 1.1** and **1.2** in **Appendix 1**). It is centred at National Grid Reference (NGR) E137149 N933373. The Development Site extends to approximately 1,700ha, although the wind farm infrastructure would occupy only a small part of the overall Development Site (35.23ha, as identified in **AI Appendix 9G**, Table 9G.1).

1.3.2 The topography of the Development Site ranges between 50 – 150m Above Ordnance Datum (AOD), with three hillocks within its northern, central and southern areas. The Development Site is dominated by blanket bog and associated mosses and heather, though there are some areas of woodland present. There are also a large number of water bodies, both standing and flowing, none of which have any conservation designations.

1.3.3 Access to the Development Site would be via the A859. Pentland Road runs through the northern part of the Development Site, and partly along the western boundary.

1.3.4 The nearest settlement to the Development Site is Stornoway, located approximately 1.5km to the east. There are no occupied properties within 1.5km of the Development Site. The nearest occupied property is a property on the A858, described in the residential visual amenity assessment (**Appendix 6C** of the EIA Report) as 'No 21 on the A858', approximately 1.8km from the Development Site. An unoccupied property (Druim Dubh) is approximately 1km from the Development Site. This property is owned by the Applicant, who is considering possible uses; any proposals to re-use the property would be subject to a separate planning permission.

1.3.5 Other than the residential area of Stornoway to the east, the area surrounding the Development Site consists predominantly of boggy, undeveloped peatland. The Development Site is not subject to any environmental designations.

1.3.6 A large part of the area to the west of the Development Site is included in the Lewis Peatlands, which is designated as a Ramsar Site, Special Protection Area (SPA) and Special Area of Conservation (SAC) primarily on the basis of its blanket bog habitats and bird population.

1.3.7 The operational three turbine Beinn Ghrideag Wind Farm is located on the western edge of the Development Site within the red line boundary. The operational Pentland Road seven turbine wind farm is located to the north west of the Development Site, and the single Bridge Cottages Newmarket turbine is located to the north east. The operational Creed single turbine is located to the south east, as is the three turbine Arnish Moor scheme. The Baile au Truseil three turbine scheme is located approximately 15km to the north of the Development Site and the Horshader single turbine a similar distance to the north west. There are a number of consented schemes in the area, including the 45 turbine Muaitheabhal scheme located approximately 20km to the south of the Development Site, and the North Tolsta and Druim Leatherann schemes which are located 18km to the north east of the Development Site. These schemes are illustrated on **EIA Figure 6.8**.

1.3.8 The Development Site is owned by the Stornoway Trust and is primarily used for grazing, forestry, angling and peat cutting. The Bhein Ghridag Wind Farm is located with the Development Site. The Bennadrove landfill site and recycling point is located in the northern third of the Development Site, close to Loch Àirigh na Lìc.

1.3.9 The Development Site has consent for the 36 turbine Consented Development.

1.4 The Proposed Development

1.4.1 The Proposed Development is illustrated on **AI Figure 4.1** and would comprise the construction and installation of 35 wind turbines and associated infrastructure. 25 turbines would have a blade tip height of up to 180m and a rotor diameter of up to 150m, while the other 10 would have a blade tip height of up to 156m and a rotor diameter of 136m. The use of two turbine heights is to accord with the surrounding topography and views. The Proposed Development would comprise the following elements:

- 35 wind turbines and associated infrastructure including foundations and hardstandings;
- Construction of site entrance;
- Upgrade and construction of internal tracks and passing bays;
- Establishment and working of up to five borrow pits;
- Construction of a temporary site compound;
- Construction of a new on-site control building and substation;
- Installation of Battery Storage System;
- Decommissioning after 25 years of operation.

Wind Turbines

1.4.2 The specific choice of wind turbine model that would be installed would be determined following a competitive tendering exercise by the Applicant. The selected turbines for the Proposed Development would not exceed the identified maximum tip height and rotor parameters as detailed in **Table 1.1**.

Table 1.1 Turbine Coordinates and Parameters

Turbine ID	Easting	Northing	Max Tip Height	Rotor Diameter
1	134518	931471	180m	150m
2	135057	931501	180m	150m
3	135334	930964	180m	150m
4	135974	931083	180m	150m
5	136504	931093	180m	150m
6	137085	931096	180m	150m
7	137745	931334	156m	136m
8	137459	931647	180m	150m
9	137054	931906	180m	150m
10	136256	931758	180m	150m
11	135678	931644	180m	150m
12	135509	932128	180m	150m
13	136047	932198	180m	150m
14	136837	932330	180m	150m
15	137962	932171	156m	136m
16	138185	932705	156m	136m
17	137539	932809	180m	150m
18	137197	932997	180m	150m
19	138130	933104	156m	136m
20	138511	933652	156m	136m
21	138265	934003	156m	136m
22	137306	934087	180m	150m
23	137124	934521	180m	150m
24	136467	934645	180m	150m
25	136497	935172	180m	150m
26	137065	935045	180m	150m
27	137656	935217	180m	150m
28	137716	934787	180m	150m
29	138091	934590	156m	136m

Turbine ID	Easting	Northing	Max Tip Height	Rotor Diameter
30	138558	934796	156m	136m
31	138323	935192	180m	150m
32	138066	935798	180m	150m
33	138600	935760	156m	136m
34	138915	935506	156m	136m
35	137800	934040	180m	150m

Turbine Foundations and Hardstandings

1.4.3 It is anticipated that foundations at the Development Site would be a rock anchor foundation system. Where this is not possible, the traditional, gravity foundation design would be implemented. This approach would be implemented to minimise peat removal and significantly reduce the amount of concrete required, thereby minimising environmental impacts as much as possible. The construction methodology for wind turbine foundations would depend on the strength of subgrade material and depth of peat specific to each proposed location. Based on current knowledge, it is anticipated that 8 gravity base foundations and 27 rock anchor /cage foundations could be required for the Proposed Development. Further details on the foundation types are found in Section 4.5.19 of **AI Chapter 4**, and on **EIA Figure 4.3** and **4.4**.

1.4.4 The crane hardstandings would be built adjacent to the turbine foundation. These areas would provide a stable base on which to lay down turbine components ready for assembly and erection, and to accommodate the cranes necessary to lift the tower sections, nacelle and rotor into place. The hardstanding would be large enough to accommodate all heavy equipment manoeuvring and component storage during turbine installation. Further detail on this is set out in Section 4.5.28 of **AI Chapter 4** and on **EIA Figure 4.5**.

Tracks

1.4.5 Approximately 28.7km of new internal wind farm tracks would be required for the Proposed Development. These tracks would form the link between the public road and the individual turbines, and would be 5m wide on the running surface. Temporary passing places (up to 58 no. up to 33m x 4m) would also be provided every 500m (or as required) to facilitate traffic movements. Potentially the main routes could have been 10m wide to facilitate two-way traffic for stone wagons, however this would require an increased use of materials and peat excavation, therefore strategic passing places were considered to be more appropriate.

1.4.6 Turning heads would be provided at the termination of each turbine string. Abnormal vehicles and cranes would use these turning heads to perform an about turn during the turbine delivery and assembly processes. Where a single turbine is located on a spur track close to the main central track and the topography is suitable, the abnormal vehicles would reverse to the junction with the main track to complete an about turn.

1.4.7 Four site entrances are proposed; two main entry points from the A859, and two on the unclassified road (Pentland Road) where the site tracks meet the road and cross it.

1.4.8 The tracks would be floated normally where the peat depth is greater than 1m, otherwise the tracks would be excavated and backfilled. Submerged drainage pipes would be installed across excavated

tracks where hydrological sensitivities are present. Further details on track design is set out in Section 4.5.30 in **AI Chapter 4**, and a section drawing of the typical floating road/tracks is given in **AI Figure 4.6** (option A and option B) and, for a standard excavated road, in **AI Figure 4.7**.

1.4.9 It is anticipated that material for track and hard standings construction would be won from on-site borrow pits (subject to rock suitability).

Watercourse Crossings

1.4.10 There are a large number of small streams, larger watercourses and drainage channels present throughout the Development Site and a small river, Abhainn Ghrioda, over which a new crossing is proposed. The detailed assessment of impacts upon the water environment is presented in **AI Chapter 9** and **EIA Chapter 11**. The access track layout has been designed to avoid crossing watercourses where possible, but due to the number of watercourses on the Development Site, and limitations regarding access locations, it is not possible for the development to take place without some being crossed. The appropriate method of watercourse crossing has been selected based on the topography, hydrology and ecology of each watercourse individually. Further information on the watercourse crossings are set out in Section 4.5.37 of **AI Chapter 4**. The Consented Development comprised three bridges and 16 culverts.

1.4.11 Two main types of watercourse crossing are proposed for the Proposed Development: bridges (**EIA Figure 4.8**) and culverts (**EIA Figure 4.9**). Based on the proposed road layout and knowledge of the site and watercourses, it is anticipated that four single span bridge crossings would be required, and the remaining 12 crossings would be culverts. Further detail on the type of crossing is set out in **AI Chapter 4** at Section 4.5.42 for bridges and 4.5.44 for culverts.

1.4.12 All watercourse crossings would be designed in accordance with the SEPA Good Practice Guide for the Construction of River Crossings and, where culverts are required, they will be designed in accordance with the CIRIA Culvert Design and Operation Guide.

1.4.13 All river crossings would be designed to convey a 1 in 200-year return period flood event, and individually sized and designed to suit the specific requirements and constraints of its location. All crossing points and methodologies would be agreed with all relevant stakeholders, prior to construction.

Site Access

1.4.14 Site access would be required for the delivery of the turbine components, construction materials and plant, and for general construction traffic. Access to the Development Site is likely to be gained via two points on the A859. Construction heavy goods vehicles (HGVs) associated with the delivery of turbine components and construction materials would be routed to the Development Site via the Arnish Point access road and the A859.

Borrow Pits

1.4.15 It is anticipated that the majority of rock used in the construction of access tracks, hardstandings, bridges, foundations and compounds would be sourced from borrow pits within the Development Site. However, at the beginning of construction, some stone would be imported to construct the access and the track to at least one internal borrow pit, with tracks to other borrow pits potentially being constructed with stone won from this and others as they are opened up.

1.4.16 The use of up to seven borrow pits is authorised for the Consented Development. By comparison, as part of the Proposed Development, only five borrow pits are proposed. Further details on the

borrow pits are set out in Section 4.5.3 of **AI Chapter 4**, in **AI Figures 4.12a-e** and **Appendix 3** of this revised Planning Statement which contains the Borrow Pit Assessment.

Temporary Construction Compound

1.4.17 One main construction compound (150m x 80m) would be required on the Development Site. The application submission had previously identified 2 other temporary compounds (100m x 100m). Since the submission of the application, these additional compounds have been removed in order to reduce construction impacts on peat. Further information on this is set out in **Appendix 4**. The compound would contain site offices, welfare facilities and provide storage for plant and materials. Further details on this are set out in Section 4.5.54 of **AI Chapter 4**, and on **EIA Figures 4.11a-b**.

Electrical Systems and Battery Storage

1.4.18 The turbines would be connected by underground cabling between each turbine, which would ultimately connect to a new control building and substation located at the east of the Development Site. The substation compound, measuring 150m x 80m, would comprise an area of hardstanding on which would be sited a single storey control building, a statcom compound and a battery storage installation. Welfare facilities would also be provided within the compound. The substation would be connected to the Scottish Hydro Electric Transmission plc (SHET) network. **EIA Figure 4.10a** provides an illustration of a typical control building and compound. Final details including external finishes would be agreed through a planning condition should consent be granted. The envisaged location of the control building and the main site compound are shown in **AI Figure 4.1**.

1.4.19 A battery storage facility able to both import and export power to the SHET network is proposed, with an anticipated capacity of approximately 50 MW ½ hour. The battery storage facility would provide back-up power to National Grid for the benefit of providing stability to the electricity supply network and the integration of more renewable energy generation. Further detail on this is set out in Section 4.5.47 of **AI Chapter 4**.

1.4.20 The Proposed Development substation would be connected to the electricity transmission network via overhead or underground electricity transmission cables. The grid connection is subject to a separate consenting regime and would be the responsibility of the electricity transmission network operator, SHET. Information on the route of the grid connection is set out **EIA Figure 4.13**.

1.5 Structure of Revised Planning Statement

1.5.1 The remainder of this revised Planning Statement is structured as follows:

- Chapter 2 summarises the statutory framework applicable to the Proposed Development;
- Chapter 3 sets out the renewable energy policy framework and an assessment of the consistency of the Proposed Development;
- Chapter 4 addresses the relevant national planning policies and guidance and an assessment of the consistency of the Proposed Development;
- Chapter 5 provides an assessment of the Proposed Development against relevant Development Plan policies and Supplementary Guidance;
- Chapter 6 summarises the benefits of the Proposed Development; and
- Chapter 7 provides a conclusion on the acceptability of the Proposed Development.
- Appendix 1 provides Figures;

- Appendix 2 provides a comparison in landscape and visual terms with the Consented Development;
- Appendix 3 provides a borrow pit assessment;
- Appendix 4 provides a comparison between the effects of the Consented Development and the Proposed Development in terms of birds; and
- Appendix 5 provides a comparison table in terms of areas of peat disturbance between the Consented Development and the Proposed Development.

2. The Statutory Framework

2.1 Introduction

2.1.1 The application for the Proposed Development is being submitted to the Scottish Government for consideration under section 36 of the Electricity Act 1989 (as amended) given that it would have a generating capacity in excess of 50MW. The Applicant also seeks a direction under section 57(2) of the Town and Country Planning (Scotland) Act 1997 that planning permission be deemed to be granted for the Proposed Development.

2.2 The Electricity Act 1989

2.2.1 The key legislative requirement is set in paragraph 3, schedule 9 of the Electricity Act 1989 which addresses the preservation of amenity and fisheries. Paragraph 3 sets out a number of environmental features to which regard must be had and confirms that mitigation must be considered so far as reasonable. Sub-paragraph 1 can be relevant to an applicant if they hold a license on the date at which a section 36 application is made. Sub paragraph 2 requires Scottish Ministers to have regard to a number of requirements. Sub paragraph 3 relates to fisheries.

2.2.2 Sub paragraphs 1, 2 and 3 state:

"(1) In formulating any relevant proposals, a licence holder or a person authorised by an exemption to generate, transmit, distribute or supply electricity -

> *(a) Shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and*
>
> *(b) Shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.*

(2) In considering any relevant proposals for which his consent is required under section 36 or 37 of this Act, the Secretary of State shall have regard to -

> *(a) The desirability of the matters mentioned in paragraph (a) of sub-paragraph (1) above; and*
>
> *(b) The extent to which the person by whom the proposals were formulated has complied with his duty under paragraph (b) of that sub-paragraph.*

(3) Without prejudice to sub-paragraphs (1) and (2) above, in exercising any relevant functions each of the following, namely, a licence holder, a person authorised by an exemption to generate or supply electricity and the Secretary of State shall avoid, so far as possible, causing injuries to fisheries or to the stock of fish in any waters."

2.2.3 In formulating the Proposed Development, the Applicant has taken into account the Schedule 9 paragraph 3 duties. The EIA for the Proposed Development demonstrates that due regard has been paid to the desirability (as applicable) of preserving, conserving or protecting the relevant features identified by Schedule 9 of the 1989 Act, and appropriate mitigation has been considered in detail and adopted where necessary to avoid or reduce significant adverse effects (this is summarised in **AI Chapter 16**). The Applicant has done all it reasonably can to mitigate any effect which the proposals on the relevant features.

2.3 The Development Plan

2.3.1 Section 25 of the Town and Country Planning Act 1997 (the TCPA 1997) requires that planning decisions are made in accordance with the development plan unless material considerations indicate otherwise. However, section 25 of the TCPA 1997 is not engaged for applications submitted pursuant to section 36 of the Electricity Act 1989 notwithstanding that they may (as in this case) seek a direction that planning permission be deemed to be granted under section 57 of the TCPA 1997. This approach has been confirmed following various High Court and Court of Session cases in recent years, such as the William Grant/Dorenell section 36 wind farm Judicial Review case of June 2012[1], and is the approach adopted by Planning Reporters and Scottish Ministers.[2]

2.3.2 There is also consensus that this does not mean that the development plan is irrelevant when determining section 36 applications. Relevant development plan policies are likely to be important material considerations especially as they will normally contain policies relating to the features listed in schedule 9 of the 1989 Act. Relevant development plan policy is therefore a material consideration which should be taken into account along with a number of other relevant considerations, including national energy and planning policies, but it does not have primacy as it would in the determination of planning applications.

2.3.3 Part 1ZA Purpose of Planning of the Planning (Scotland)Act 2019 sets out that the purpose of planning is to manage the development and use of land in the long term public interest, and that anything which contributes to sustainable development is to be considered as being in the long term public interest. In principle, renewable energy developments are inherently sustainable development and thus in the long term public interest because they assist in achieving the 2030, and the 2045 net zero targets (see **Section 3.3**).

2.3.4 The following chapters of the Planning Statement address all of these matters, namely the relevant environmental features in Schedule 9 of the 1989 Act, Scottish Government planning and energy policy and relevant aspects of the development plan.

[1] https://www.scotcourts.gov.uk/search-judgments/judgment?id=dd7a86a6-8980-69d2-b500-ff0000d74aa7 paragraphs 11-18.

[2] see for example paragraph 9.1 of the report to the Scottish Ministers in case WIN-190-4.

3. Renewable Legal and Energy Policy Framework

3.1 Introduction

3.1.1 This Chapter explains the rationale for the Proposed Development in terms of international, UK and Scottish Government renewable energy policy.

3.2 International Policy Context

3.2.1 The Scottish and UK legislative and policy framework on climate change is shaped by international climate change legislation. These incorporate binding targets in the reduction of greenhouse gas emissions and in the generation of energy from renewable sources.

Kyoto Protocol 1997

3.2.2 The Kyoto Protocol is an international treaty under the United Nations Framework Convention on Climate Change (UNFCCC) that commits state parties to reduce greenhouse gas emissions. The Protocol's first commitment period started in 2008 and ended in 2012. A second commitment period was agreed on in 2012, running to 2020, in which 37 countries have binding targets, including the EU and its Member States.

The COP21 UN Paris Agreement 2015

3.2.3 The central aim of the Paris Agreement is to strengthen the global response to the threat of climate change by keeping the increase in global temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C. The first global "stocktake" to assess collective progress is to take place in 2023 and will follow every five years thereafter.

3.2.4 In 2018 the Intergovernmental Panel on Climate Change (IPCC) published a special report on the impacts of global warming of 1.5^0 above pre-industrial levels and related greenhouse gas emissions pathways, in the context of strengthening the global response to the threat of climate change. The report states that pathways limiting global warming to 1.5°C with no or limited overshoot would require rapid and far-reaching transitions in energy, with renewables being projected to supply 70–85% of electricity in 2050. The UK Government responded to the report by asking the UK Committee on Climate Change to update the advice it gives to Government on setting targets for carbon emissions and whether the UK needs to reduce carbon emissions at a faster rate or to a greater extent than originally planned.

3.2.5 This continued focus on the decarbonisation of the energy generation sector will result in a reliance on mature renewable energy technologies such as onshore wind.

The COP26 UN Climate Change Conference UK 2020

The COP26 will take place at the Scottish Event Campus (SEC) in Glasgow between the 9 and 20 November 2020. The Prime Minister appointed Alok Sharma as the COP26 President on 13 February 2020.

EU Targets Package

3.2.6 In January 2008 the European Commission published a '20-20-20' targets package[3]. This included:

- A target of at least 20% of the EU's total energy needs to be generated from renewable resources by 2020;
- A reduction in the EU's greenhouse gas emissions of at least 20% below 1990 levels;
- A 20% reduction in primary energy use compared with projected levels, to be achieved by improving energy efficiency.

3.2.7 The UK obligations include a minimum requirement of 15% of all energy consumed in the UK to come from renewable sources by 2020. The position as of the end of 2017 (the full year for which figures are available) was that renewable sources only accounted for approximately 10.2% of total energy consumption in the UK[4].

3.2.8 In October 2014 the EU agreed the 2030 Climate & Energy Policy Framework, which introduced the binding target of at least 27% of all energy consumed to come from renewable energy in 2030. In November 2018 the European Parliament approved an updated energy policy legislative framework that will facilitate the clean energy transition[5]. The framework fixes two new targets for the EU for 2030: a binding renewable energy target of at least 32% and an energy efficiency target of at least 32.5% - with a possible upward revision in 2023. It is anticipated that when these policies are fully implemented, they will lead to steeper emission reductions for the whole of the EU than anticipated - some 45% by 2030 relative to 1990 (compared to the previous target of a 40% reduction).

3.2.9 The above has not yet been translated into UK legislation or policy and may not do so due to Brexit. However, the UK Government is still bound by national and international de-carbonisation obligations and the UK and Scottish Governments both still intend to move forward with ambitious plans to reduce carbon emissions as evidenced by the net zero targets set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019.

3.3 UK Energy Policy

3.3.1 Numerous appeal and Scottish Ministerial decisions have consistently made it clear that it is necessary to take into account UK Government energy policy in determining applications for wind farms[6].

Climate Change Act 2008

3.3.2 The Climate Change Act is the basis for the UK's approach to tackling and responding to climate change. This Act committed the UK to reducing greenhouse gas emissions by at least 80% of 1990 levels by 2050. It also requires the Government to set legally-binding 'carbon budgets' to act as stepping stones towards the 2050 target. A Committee on Climate Change was set up to ensure emissions targets are set based on expert independent assessment of the evidence and to monitor the UK's progress towards meeting the targets.

[3]EU Directive 2009/28/EC5 (Renewable Energy Directive), which builds on the international commitments made under the Kyoto Protocol, sets mandatory targets for EU member states

[4] BEIS, Digest of UK Energy Statistics (July 2018).

[5] https://ec.europa.eu/info/news/new-renewables-energy-efficiency-and-governance-legislation-comes-force-24-december-2018-2018-dec-21_en

[6] see for example paragraph 9.1 of the PLI report to Scottish Ministers in case WIN-190-4, Pencloe Wind Farm, 2 March 2018.

3.3.3 Carbon budgets cover a five year period and currently run to 2032. The UK is currently in the third carbon budget period (2018 to 2022). The Committee on Climate Change has confirmed that the first carbon budget was met and the UK is currently on track to outperform on the second and third, however, it is not on track to meet the fourth (2023 to 2027), and to meet future carbon budgets and the 80% target for 2050, the UK will need to reduce emissions by at least 3% a year, from now on, requiring more challenging measures to be applied by Government. The UK Government has confirmed its intention to set the Fifth Carbon Budget to reduce UK greenhouse gas emissions relative to 1990 levels by 57% by 2028-32, in line with the advice of the Committee on Climate Change.

Climate Change Act 2008 (2050 Target Amendment) Order 2019

3.3.4 Article 2 of this Order amends section 1 of the Climate Change Act 2008 (see **Section 3.3.2** above). Section 1(1) imposes a duty on the Secretary of State to ensure that the UK will reduce greenhouse gas emissions by 100% of 1990 levels by 2050. Previously this was 80%.

UK Renewable Energy Strategy 2009

3.3.5 This set out the path for the UK to meet the legally binding target of 15% of all energy consumed in the UK to come from renewable sources by 2020. It includes action to deliver the 'lead scenario' of 30% of electricity, 12% of heat and 10% of transport energy to be generated from renewables by 2020. The Strategy will help us tackle climate change, reducing the UK's emissions of carbon dioxide by over 750 million tonnes between 2009 and 2030. The Strategy reaffirms the requirement to be the target of an 80% reduction in greenhouse gas emissions by 2050 identified in the Climate Change Act 2008.

UK Renewable Energy Roadmap 2011 and updates in 2012 and 2013

3.3.6 The 2011 roadmap analysed how the deployment of renewable energy might evolve by 2020, focussing on 8 technologies that have either the greatest potential to help the UK meet the 2020 target in a cost effective and sustainable way, or offer great potential for the decades that follow. This included onshore wind. The 2012 update highlighted the urgent need for new large scale renewable energy projects to ensure the 2020 targets are met. The 2013 update noted that the share of renewable energy generation had increased from 9.7% in 2012 to 15.5% in 2013, and that Scotland accounted for 33% of the total UK renewables output during this period. The role of onshore wind is noted in paragraph 114: "*Onshore wind, as one of the most cost effective and proven renewable energy technologies, has an important part to play in a responsible and balanced UK energy policy*".

UK Clean Growth Strategy 2017

3.3.7 The UK Government published the Clean Growth Strategy 'Leading the Way to a Low Carbon Future' in October 2017. It makes reference to the 2015 Paris Agreement and states:

"*The actions and investments that will be needed to meet the Paris commitments will ensure the shift to clean growth will be at the forefront of policy and economic decisions made by Government and businesses in coming decades*".

3.3.8 The strategy recognises that meeting the fourth and fifth carbon budget raises challenges, stating:

"*In order to meet the fourth and fifth carbon budgets (covering the periods 2023 – 2027 and 2028-2032) we will need to drive a significant acceleration in the pace of decarbonisation and in this strategy we have set out stretching domestic policies that keep us on track to meet our carbon budgets*".

3.3.9 The strategy sets out two guiding objectives for the UK's approach to reducing emissions:

- To meet our domestic commitments at the lowest possible net cost to UK taxpayers, consumers and businesses;
- To maximise the social and economic benefits for the UK from this transition.

3.3.10 The Strategy identifies that, in order to meet these objectives, the UK will need to nurture low carbon technologies, processes and systems that are as cheap as possible. Onshore wind have seen a reduction in costs by about 50% since 2009, and is regarded as one of the cheapest forms of electricity generation,

UK Industrial Strategy 2017

3.3.11 The Industrial Strategy White Paper entitled 'Building a Britain fit for the Future' was published by the UK Government in November 2017. The Industrial Strategy sets a path to improved productivity and identifies four Grand Challenges – developments in technology that are set to transform industries and societies around the world, and in which the UK has the opportunity to play a leading global role. One of these Grand Challenges is 'clean growth'. The Industrial Strategy sees the move to cleaner economic growth through low carbon technologies and the efficient use of resources as "*one of the greatest industrial opportunities of our time*" (page 42).

3.3.12 The Strategy sets out the aim to maximise the advantages for UK industry through leading the world in the development, manufacture and use of low carbon technologies, systems and services which cost less than high carbon alternatives (page 42).

Conclusions on UK Energy Policy

3.3.13 At a UK level there are established and legally binding renewable energy, electricity and carbon emission saving targets for 2020 (15% of final energy consumption) and beyond which remain unmet (11% in 2018). This element of the policy framework constitutes an important material consideration in favour of the Proposed Development.

3.4 Scottish Government Energy Policy

3.4.1 Energy policy is a matter reserved to the UK Parliament. The UK Government therefore retains control of the overall direction of energy policy including renewable energy targets. However, the devolved administrations, including the Scottish Government can, and have, prepared distinct climate change and related renewable policy for their devolved areas as well as implementing UK wide policies.

The Climate Change (Scotland) Act (2009)

3.4.2 The 2009 Act is the key legislation in Scotland dealing with climate change and carbon targets. The Act included an interim greenhouse gas emissions reduction target of at least 42% for 2020 and an 80% reduction target for 2050 against 1990 levels. The Act requires Scottish Ministers to set annual targets for Scottish emissions from 2010 to 2050, consistent with meeting both the interim and 2050 targets. The Act has been amended in 2019 requiring 100% lower than the 1990s baseline level. Details of this are set out below.

3.4.3 The Act requires that, as soon as reasonably practicable after setting the annual targets, Ministers publish a report setting out policies and proposals for meeting those targets. This is delivered through the publication of Climate Change Plans. The Scottish Government published its third

Climate Change Plan in February 2018, setting out proposals and policies to reduce emissions by 66% by 2032 against 1990 levels (see **Section 3.4.24** below).

2020 Routemap for Renewable Energy in Scotland 2011 (updated 2013 & 2015)

3.4.4 The Scottish Government published the 2020 Routemap in July 2011. It established a target for the equivalent of 100% of Scotland's electricity demand to be supplied from renewable sources by 2020, roughly equating to the equivalent of around 16GW of installed capacity. The Scottish Government recognised at that time that "*Meeting the equivalent of 100% of Scottish demand for electricity from renewables within the next 9 years will be a huge challenge*" (page 19) and to meet the target will "*demand a significant and sustained improvement over the deployment levels seen historically*" (page 26). This target remains unmet (see further below) and the challenge of further sustained deployment remains.

3.4.5 The Routemap also provided an increase in the Scottish Government's overall renewable energy target to 30% by 2020 and a new target of 500 MW of community and locally-owned renewable energy by 2020.

3.4.6 Chapter 3 of the Routemap provides a specific routemap for Onshore Wind. The first sentence states that "*The Government is committed to the continued expansion of portfolio of onshore wind farms to help meet renewables targets*". It adds that onshore wind is a mature and relatively low cost renewable technology with an established supply chain and is capable of being deployed at a high rate.

3.4.7 The Routemap was updated in December 2013. It continues to recognise the role that renewable energy has in delivering secure, low carbon and cost effective energy supplies and the investment and job opportunities it presents.

A further Routemap update published in September 2015 provided statistics on deployment of renewables at that time and sectoral updates. The onshore wind update states that "Onshore wind has a pivotal role in delivering our 2020 renewables targets…".

Electricity Generation Policy Statement 2013

3.4.8 The Electricity Generation Policy Statement was published in June 2013. It examines the way Scotland generates electricity and considers the changes necessary to meet the various targets in the sector set by Government, including in the Climate Change (Scotland) Act 2009. It reiterates the Government's commitment to securing the transition to a low carbon economy and that Scotland has the potential to make a major contribution to the EU's overall renewables target.

3.4.9 The Policy Statement is built around the 2020 target of the equivalent of 100% of Scotland's electricity demand to be supplied from renewable sources by 2020. It acknowledges that the target, which it estimates would require around 14 -16GW of installed capacity, is a challenge. But it embodies the Government's belief that "*Scotland can and must exploit its huge renewables potential to the fullest possible extent – to help meet demand here and across Europe*" (paragraph 14).

3.4.10 The Policy Statement highlights that the renewable targets underpin the Government's vision of a stable and desirable future generation mix for Scotland, built around the following key principles:

- A secure source of electricity supply;
- At an affordable cost to consumers;
- Which can be largely de-carbonised by 2030; and

- Which achieves the greatest possible economic benefit and competitive advantage for Scotland including opportunities for community ownership and community benefits.

The Chief Planner Letter to All Heads of Planning (November 2015)

3.4.11 A letter from the Scottish Government Planning and Architecture Division to all Heads of Planning entitled 'Energy Targets and Scottish Planning Policy' was published in November 2015. The letter was issued following an announcement by the Secretary of State for Energy and Climate Change that the UK Government would be bringing to an early closure the Renewable Obligation subsidy scheme. The letter confirmed that the Scottish Government's policy remains unchanged and that it supports new onshore renewable energy developments, including onshore wind farms and particularly community-owned and shared ownership schemes.

3.4.12 The letter adds that this policy support continues in the situation where renewable energy targets have been reached, and confirms that there is no cap on the support for renewable energy development, including onshore wind once the target has been reached. In short, the need for renewable energy including onshore wind is unconstrained.

The Scottish Energy Strategy (December 2017)

3.4.13 The Scottish Energy Strategy, which was published in December 2017, sets out the Scottish Government's 2050 vision for the future energy system in Scotland:

"*A flourishing, competitive local and national energy sector, delivering secure, affordable, clean energy for Scotland's households, communities and businesses*" (page 6).

3.4.14 The Strategy reiterates the role that Scotland can play in delivering international and national commitments on reducing greenhouse gas emissions and notes that renewable energy and its associated infrastructure is now a major industrial sector in its own right, helping to sustain economic growth and employment.

3.4.15 The 2050 vision is built around six priorities. Of particular relevance to the Proposed Development is the priority of 'renewable and low carbon solutions'. The Scottish Government state that it will:

"*Continue to champion and explore the potential of Scotland's huge renewable energy resource, and its ability to meet our local and national heat, transport and electricity needs – helping to achieve our ambitious emissions reductions targets*." (page 8).

3.4.16 Two new targets for the Scottish energy system by 2030 are set out on page 7:

- The equivalent of 50% of the energy for Scotland's heat, transport and electricity consumption to be supplied from renewable sources;
- An increase by 30% in the productivity of energy use across the Scottish economy.

3.4.17 The Strategy identifies that renewable electricity could rise to over 140% of Scottish electricity consumption, ensuring its contribution to the wider renewable energy target for 2030. The Strategy continues that this assumes a considerably higher market penetration of renewable electricity than today, requiring in the region of 17GW of installed capacity in 2030 (compared to 9.5GW of installed capacity as at June 2017.

3.4.18 The role of renewable energy in achieving the longer term vision is emphasised on page 34 where it states:

"*Scotland's long term climate change targets will require the near complete decarbonisation of our energy system by 2050, with renewable energy meeting a significant share of our needs*".

3.4.19 The role of renewable energy generation, and the vital role of onshore wind, to achieve climate change targets is recognised by the Strategy:

"*Our energy and climate change goals mean that onshore wind must continue to play a vital role in Scotland's future – helping to decarbonise our electricity, heat and transport systems, boosting our economy, and meeting local and national demand. That means continuing to support development in the right places, and –increasingly – the extension and replacement of existing sites with new and larger turbines, all based on an appropriate, case by case assessment of their effects and impacts*" (page 43).

The Onshore Wind Policy Statement (December 2017)

3.4.20 The Ministerial foreword confirms the importance of renewable energy, including onshore wind, for meeting climate change targets and notes that onshore wind is a vital component of the economic opportunity that renewables more generally create for Scotland. The foreword identifies that the important role for onshore wind means that development in the right places must be supported, and – increasingly – the extension and replacement of existing sites, where acceptable, with new and larger turbines, based on an appropriate, case by case assessment of their effects and impacts. The Proposed Development would be on the site of the Consented Development, so it is already established that the Development Site is the 'right place', so the focus is whether the Proposed Development is the 'right development'.

3.4.21 The Policy Statement acknowledges that onshore wind is a mature and established technology, is now amongst the lowest cost forms of generating electricity, and the Scottish Government expects onshore wind to remain at the heart of a clean, reliable and low carbon energy future in Scotland (paragraph 2).

3.4.22 The Policy Statement identifies that, in order for onshore wind to play its vital role in meeting Scotland's energy needs and a material role in growing the economy, its contribution must continue to grow (paragraph 3). It continues that onshore wind generation will remain crucial in terms of the goals for a decarbonised energy system beyond 2020, helping to meet the greater demand from heat and transport as well as making further progress towards the ambitious renewable targets which the Scottish Government has set. This means that Scotland will continue to need more onshore wind development and capacity, in locations across Scotland's landscapes where it can be accommodated (paragraph 4).

Climate Change Plan 2018

3.4.23 This Climate Change Plan is the Scottish Government's third report on proposals and policies for meeting its climate change targets. It sets out how Scotland can deliver its target of 66% emissions reductions, relative to the baseline, for the period 2018–2032. The Climate Change Plan comprises three parts. Part One sets out the context for the Scottish Government's climate change proposals and policies. It shows the emissions reductions pathway to 2032 and the crucial roles that will be played by local authorities and the wider public sector (and the planning system) and communities. The Scottish Government's statutory duties are covered in Part Two, alongside the annual emissions targets to 2032 and the monitoring framework and indicators that will be used to measure progress against the policies set out in the Plan. Part Three provides detailed information on the emissions envelopes and emissions reduction trajectories for each sector.

3.4.24 The continuing role for onshore wind is recognised. Page 46 identifies that "*onshore wind opportunities remain*". A role for onshore wind, including island wind, is seen as part of the ambitions in the electricity sector by 2032 (page 68). The Climate Change Plan reiterates the Scottish Government's support for community and locally owned energy. It also restates the

importance that the Scottish Government place on the need for a route to market for lowest cost renewable technologies, including onshore wind.

Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

3.4.25 The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 received Royal Assent on 31 October 2019. The Act requires that the net Scottish emissions account for the net-zero emissions target year is at least 100% lower than the baseline (the target is known as the "net-zero emissions target"). The "net-zero emissions target year" is 2045.

3.4.26 The Act sets interim targets as follows:

- 2020 is at least 56% lower than the baseline;
- 2030 is at least 75% lower than the baseline, and
- 2040 is at least 90% lower than the baseline.

3.4.27 In introducing the net zero target, the Climate Change Secretary stated "*There is a global climate emergency. The evidence is irrefutable. The science is clear. And people have been clear: they expect action. The Intergovernmental Panel on Climate Change issued a stark warning last year: the world must act now. By 2030 it will be too late to limit warming to 1.5 degrees.*"

3.5 Progress Towards Achieving Targets

3.5.1 The Scottish Government's target is to achieve the equivalent of 50% of total Scottish energy consumption from renewable sources by 2030. Figures published by the Scottish Government in December 2018[7]' show that in 2017, 21% of total Scottish energy consumption came from renewable sources (provisional figure) (19.2% in 2017, and 20.8% in 2018).

3.5.2 The Scottish Government also has a target to deliver the equivalent of 100% of Scottish electricity consumption from renewables by 2020. As noted in **Section 3.4.4** above, the '2020 Routemap for Renewable Energy in Scotland' acknowledged that this was a challenging target that will demand a significant improvement over the deployment levels seen historically. In 2018, renewable sources generated the equivalent of 76.2% gross electricity consumption[8], this is up from 70.1% in 2017.

3.5.3 The 2020 100% electricity target equates to around 16GW of installed renewables capacity. The 50% energy from renewable sources by 2030 target in the Scottish Energy Strategy (2017) may require in the region of 17GW of installed renewables capacity by 2030 (Scottish Energy Strategy page 34).

3.5.4 Figures released in the Energy Statistics for Scotland (December 2019) show that as of September 2018, 11.7GW of renewable electricity capacity was operational in Scotland (an increase of 0.9GW compared with September 2018). While there is an additional 12.9GW of capacity either under construction, consented, or in planning, the target relates to installed capacity, a point made clear in a number of Public Inquiry reports[9].

3.5.5 In any event, the need for renewable energy is unconstrained regardless of progress towards targets. As noted by the Reporter for the Caplich Wind Farm, reiterating the position set out in the Chief Planner Letter to All Heads of Planning (November 2015), stating at paragraph 2.107 that '*It is*

[7] Energy Statistics for Scotland December 2019.
[8] Energy Statistics for Scotland December 2019.
[9] South Kyle (2016), reference WIN-190-3, paragraph 2.68; Benbrack reference WIN-170-2002 paragraph 2.67; Caplich (2017) reference WIN-270-7 paragraph 2.116.

clear therefore that, when considering the level of policy support that is offered by the Scottish Government to proposals such as this, it does not matter whether targets have been met or exceeded. Support for appropriate on-shore wind energy proposals will remain, even when existing targets have been met.'

3.5.6 The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 sets out even more ambitious targets, including increasing the 2045 target to 100% emissions reduction and making provisions for a net/zero greenhouse gas emissions target to be set on a credible and costed pathway. The UK Committee on Climate Change (CCC) in its advice to the UK and Scottish Governments on achieving the net-zero target stated that renewable electricity generation "*must quadruple*". The Scottish Government should make "*use of planning powers to drive decarbonisation*". In December 2019, the CCC stated "*Scotland's next Climate Change Plan must set out a comprehensive strategy detailing the policies and governance that will drive a rapid, sustained transformation to a net-zero society. Net-zero planning must be embedded across all levels of government in Scotland, it must also engage the public, provide a stable direction of travel and set out a simple, investable set of rules and incentives for business*".

3.5.7 The targets mean demand for renewable electricity will go up, rather than down. There was a shortfall for the previous 2020 targets.

3.5.8 What remains very clear is that there is a significant shortfall against the Scottish 2020 renewable electricity generation target (which relates to operational development) and the targets should not, in any event, be treated as a cap.

3.5.9 The Caplich Public Inquiry report (the findings of which were adopted by the Scottish Ministers) also confirms that national planning policy as set out in NPF3 and SPP confirms the commitment to making Scotland a low carbon place and a world leader in low carbon energy generation including in relation to onshore wind and that '*the proposal's contribution to such commitments is a factor in its favour that must be taken into account*'. Similarly the substantial contribution of the Proposed Development to such commitments (see below) is a factor in its favour and must be taken into account.

Energy Savings

3.5.10 It is predicted that the carbon loss in developing the Proposed Development would be paid back in approximately 1.1 years (4.4% of the 25-year operational life) based upon the fossil fuel mix and the expected outcome (see **AI Appendix 9H** for calculations and information (**Appendix F**). The Consented Development identified a payback of potentially 15months.

3.5.11 On the basis of potential annual CO2 savings of 352,904 tonnes/year (based on figure of 430g of CO2 savings per kWh and a site specific capacity factor of 47.8%), the Proposed Development could result in a total carbon saving of approximately 8.8M tonnes over its 25 year operational life, and generate electricity to annually supply the equivalent of 229,183 average homes in Scotland (see **Appendix 9H** for calculations and information (**Appendix F**)). The Consented Development identified carbon savings of 179,161 tonnes/year (mixed grid).

3.6 Conclusions on Renewable Energy Policy

3.6.1 The climate change and renewable energy policy framework is a very important consideration that should attract significant weight in the determination of this section 36 application.

3.6.2 In the context of the wider international and national policy, aims and objectives, the Proposed Development would represent a significant enhancement when compared to the Consented Development, not just in terms of renewable energy output but in the savings associated with CO_2

output. The increase in renewable energy output as a result of the Proposed Development, when compared to the Consented Development would ensure further progress towards meeting the national and international targets in limiting the amount of greenhouse gas emissions outlined above.

3.6.3 The Scottish Energy Strategy and the Onshore Wind Policy Statement both recognise the role of onshore wind as a key contributor to the delivery of renewable energy targets - specifically the new 2030 50% energy from renewable sources target and the 2045 target to 100% emissions reduction.

3.6.4 The increase in installed capacity as a result of the Proposed Development in a location where commercial scale wind development has previously been found acceptable, would help to reduce the significant shortfall predicted against the Scottish 2020 renewable electricity generation target. It would make an important contribution to the 2030 target, which the Scottish Government has identified may require renewable electricity to generate 140% of Scotland's electricity needs for the energy target to be met.

4. National Planning Policy

4.1 Introduction

4.1.1 National planning policy is set out within the National Planning Framework (NPF) and Scottish Planning Policy (SPP). Both were published in 2014 and are at the end of their 5 year life. The Planning (Scotland) Act 2019 sets out changes to the development plan hierarchy and the format and content of NPF and SPP. The timetable for the review of NPF and SPP is dependent on the Planning (Scotland) Act 2019 and work for the NPF4 and SPP is well underway with consultation and engagement throughout January – April 2020. The final version of the NPF4 is expected to go before parliament in 2021. The current 2014 documents therefore provide the current national policy framework, with the Scottish Energy Strategy and Onshore Wind Policy Framework providing up to date advice on the Scottish Minister's position and targets for the supply of energy from renewable sources. Both NPF3 and the SPP pre-date the declaration of climate emergency by Scottish Ministers, and the net zero target by 2045. Both these factors are material changes which mean that NPF4 and SPP will likely change significantly in terms of support for renewable electricity.

4.2 National Planning Framework (NPF3) 2014

4.2.1 The National Planning Framework (NPF3) was published in June 2014. NPF3 provides the statutory framework for Scotland's long term spatial development. It sets the spatial expression of the Scottish Government's Economic Strategy and plans for development and investment in infrastructure. It sets out the Scottish Government's spatial development priorities for the next 20 to 30 years and what is expected of the planning system and the outcomes it must deliver.

4.2.2 NPF3 sets out a national spatial strategy structured around four key themes. These are set below:

- A successful, sustainable place: this theme is underpinned by the objective of achieving "*a growing low carbon economy*" alongside creating "*high quality, vibrant and sustainable places…*". NPF3 calls for a renewed focus on exploiting Scotland's energy resources, and in paragraph 2.7 it identifies a need for development that "*facilitates adaptation to climate change, reduces resource consumption and lowers greenhouse gas emissions*";
- A low carbon place: this theme relates to the legally binding target of reducing Scotland's greenhouse gas emissions by 80% by 2050 compared with 1990 levels, as set out in the Climate Change (Scotland) Act 2009. It states that "*Our built environment is more energy efficient and produces less waste and we have largely decarbonised our travel*". In relation to onshore wind, paragraph 3.7 states that "*there is strong public support for wind energy as part of the renewable energy mix*", however it is noted that the social acceptability of wind farms varies in different locations. Paragraph 3.8 reiterates the Scottish Government's commitment to meeting its renewable energy deployment targets. To help achieve these decarbonisation targets, paragraph 3.23 confirms the Scottish Government's view that "*onshore wind will continue to make a significant contribution to diversification of energy supplies*";
- A natural, resilient place: this theme is concerned with environmental protection and it is noted that Scotland's principal asset is the land, which must be managed sustainably as both an economic and dynamic resource and an environmental asset. It is noted in paragraph 4.22 that "*rural areas have a particular role to play in building Scotland's long-term resilience to climate change and reducing our national greenhouse gas emissions*";

- A connected place: this theme is orientated around maximising physical and digital connectivity around Scotland and between Scotland and the rest of the world.

4.2.3 NPF3 reaffirms the Scottish Government's commitment to renewable energy targets (30% of overall energy demand from renewable sources by 2020) and recognises the role of onshore wind in achieving these targets. NPF3 supports the deployment of appropriately located onshore wind energy development. Onshore wind development is recognised as a key technology in the energy mix which will contribute to Scotland becoming 'a low carbon place'.

4.3 Scottish Planning Policy (SPP) 2014

4.3.1 SPP (Scottish Government, 2014) sets out the Scottish Government's expectations regarding the treatment of specific planning issues within development planning and development management. As paragraph iii, the SPP states "the content of the SPP is a material consideration that carries significant weight" in the determination of planning applications. It is common to consider and similarly apply SPP policy in the context of section 36 consent application.

Presumption on Favour of Sustainable Development

4.3.2 Paragraph 27 of the SPP sets out that sustainable economic growth is the key to unlocking Scotland's potential. To this end, the SPP introduces as one of its core policy principles a presumption in favour of development that contributes to sustainable development.

4.3.3 Paragraph 32 clarifies that:

"*Proposals that accord with up-to-date plans should be considered acceptable in principle and consideration should focus on the detailed matters arising. For proposals that do not accord with up-to-date development plans, the primacy of the plan is maintained and this SPP and the presumption in favour of development that contributes to sustainable development will be material considerations*".

Paragraph 33 of the SPP requires that in circumstances where the relevant policies are out of date or where the development plan document is more than five years old, the presumption in favour of sustainable development becomes a significant material consideration. The Development Plan for the Outer Hebrides was adopted in 2018 and so is not more than five years old. However, the presumption in favour of sustainable development is still a relevant consideration. This is demonstrated in the approach taken by the Reporter for the Caplich wind farm[10] (Inquiry report dated November 2017 and Scottish Minister's decision dated April 2018, which adopted the reasoning of the Reporter). At paragraph 2.131 the Reporter confirms that that "*the SPP presumption applies to all forms of development that would contribute to sustainable development, regardless of the age of content of a Development Plan. However, the effect of paragraphs 32 and 33 of SPP is that the age and content of a development plan may affect the weighing of a proposal's positive and negative implications in the planning balance*".

4.3.4 The Reporter clarified at paragraph 2.130 that renewable energy proposals should not automatically be classed as sustainable development, and that an assessment of the specific impacts of the proposal should be carried out against the 13 principles that are set out in paragraph 29 and the four outcomes to which SPP aspires. The Reporter identified that additional assistance may be provided by considering the detailed assessment criteria for on-shore wind in paragraph 169 of SPP.

[10] Reference WIN-270-7.

4.3.5 The following sections adopt the same approach and consider the Proposed Development against the SPP the national outcomes and the policy principles, taking account of the development management assessment criteria in paragraph 169.

National Outcomes

4.3.6 The Scottish Government has identified 16 national outcomes which explain how the purpose of sustainable economic growth is to be achieved. Both the NPF3 and the SPP are underpinned by a common vision, which is articulated in paragraph 11 of the SPP:

"*We live in a Scotland with a growing, low-carbon economy with progressively narrowing disparities in well-being and opportunity. It is growth that can be achieved whilst reducing emissions and which respects the quality of environment, place and life which makes our country so special. It is growth which increases solidarity – reducing inequalities between our regions. We live in sustainable, well-designed places and homes which meet our needs. We enjoy excellent transport and digital connections, internally and with the rest of the world*".

4.3.7 The SPP sets out four planning outcomes that explain how planning should support the vision, and that for planning to make a positive difference, development plans and new development need to contribute to achieving these outcomes. The Proposed Development would contribute to three of the four outcomes. The fourth outcome is orientated around maximising physical and digital connectivity and is not relevant for the Proposed Development (see **Table 4.1**).

Table 4.1 National Outcomes

National Outcome	Proposed Development
Outcome 1: A successful, sustainable place – supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places.	The Proposed Development would assist in delivering sustainable economic growth.
Outcome 2: A low carbon place – reducing our carbon emissions and adapting to climate change.	The Proposed Development would assist in reducing carbon emissions and meeting emission reduction targets.
Outcome 3: A natural, resilient place – helping to protect and enhance our natural and cultural assets, and facilitating their sustainable use.	The Proposed Development would make a positive use of resources and contribute to climate change mitigation.

SPP Policy Principles

4.3.8 The SPP states that the aim of the planning system is to aim is to achieve the right development in the right place; it is not to allow development at any cost, and paragraph 29 sets out a number of principles to guide policies and decisions. The previously Consented Development established that that the Development Site is the right place for a commercial scale wind farm. The principles of relevance to the Proposed Development are identified in **Table 4.2** below together with an assessment of whether the Proposed Development is compliant with the principles.

Table 4.2 SPP Policy Principles

Policy Principle	Proposed Development
Giving due weight to net economic benefit.	There would be net positive socio-economic effects (**EIA Chapter 14**).
Respond to economic issues, challenges and opportunities, outlined in local economic strategies.	There would be positive local economic effects (**EIA Chapter 14**).
Supporting good design and the six qualities of successful places.	The design principles for the Proposed Development and the design iterations, described in **AI Chapter 3**, demonstrate that due regard has been given to minimising environmental impacts and that the turbine layout can be accommodated within the Development Site.
Supporting delivery of infrastructure, for example transport, education, energy, digital and water.	Energy infrastructure would be delivered.
Supporting climate change mitigation and adaptation including taking account of flood risk.	The Proposed Development would have the capacity to generate significant amounts of renewable electricity. Furthermore, the Proposed Development would increase the amount of renewable energy compared to the Consented Development.
Improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation.	The Proposed Development would provide opportunities for public access including for walking and cycling.
Having regard to the principles for sustainable land use set out in the Land Use Strategy.	The Proposed Development would represent a sustainable use of land.
Protecting, enhancing and promoting access to cultural heritage, including the historic environment.	The iterative design process has been used to ensure that the effects of the Proposed Development on heritage assets has been minimised through avoidance of significant archaeological remains where possible and ensuring appropriate separation distances from heritage assets. Significant adverse effects have been identified for two heritage assets - Scheduled Stone Circle at Druim Dubh and the Category B listed Stornoway War Memorial. This is no different to the Consented Development (**EIA Chapter 7**).
Protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment.	The landscape has the capacity to accommodate the Proposed Development and it would provide opportunities for public access. The iterative design process has incorporated measures to minimise impacts on ecology, freshwater ecology, ornithology, the most sensitive areas of blanket bog habitat and rare plant species.
Avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality.	The Proposed Development would be consistent with this principle.

Paragraph 169 Development Management Assessment Criteria

4.3.9 This paragraph identifies a number of considerations which are likely to be relevant when determining proposed energy infrastructure developments. These include economic impacts and benefits, renewable energy targets, effects on greenhouse gas emissions, cumulative impacts and environmental impacts including noise, visual, access, tourism, hydrology, geology, heritage, transport and ecology.

4.3.10 Given the findings of the **EIA Report, AI** and the assessment in this revised Planning Statement, the Proposed Development is considered to be acceptable in terms of the factors listed in paragraph

169 of the SPP. More detail on the assessment of the Proposed Development against the factors identified in paragraph 169 can be found in **Chapter 5** of this revised Planning Statement.

Conclusions on Presumption in Favour of Sustainable Development

4.3.11 The Proposed Development would enhance overall renewable energy generation yield and greenhouse gas emissions reduction thereby contributing to the continued need set out in national policy and guidance, including the Scottish Energy Strategy, for the development of and investment in renewable energy technologies.

4.3.12 Furthermore, the Proposed Development would:

- Contribute to achieving three out of the four outcomes identified in the SPP;
- Comply with the principles set out in paragraph 29 of the SPP;
- Be acceptable in terms of the development management considerations listed in paragraph 169.

4.3.13 It is therefore considered that the Proposed Development would contribute to sustainable development, and draws benefit from the presumption.

Assessment against Relevant Policies

A Low Carbon Place

4.3.14 Policies regarding renewable energy development are set out in paragraphs 152-174 of SPP. It is noted in paragraph 152 that taken together, the NPF3 and the SPP should '*facilitate the development of generation technologies that will help to reduce greenhouse gas emissions from the energy sector*'. In this regard paragraph 153 states that the '*efficient supply of low carbon and low cost heat and generation of heat and electricity from renewable energy sources are vital to reducing greenhouse gas emissions and can create significant opportunities for communities*'.

4.3.15 Paragraph 154 identifies four planning principles related to the delivery of electricity and heat infrastructure, three of which are of relevance to the Proposed Development:

- Support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving 30% of overall energy demand from renewable sources by 2020...and the equivalent of 100% of electricity demand from renewable sources by 2020;
- Support the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity – and the development of heat networks;
- Guide development to appropriate locations and advise on the issues that will be taken into account when specific proposals are being assessed.

4.3.16 In terms of development planning, paragraph 155 states: '*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*'. In particular, Local Development Plans are required under paragraph 157 to "*set out the factors to be taken into account in considering proposals for energy developments. These will depend on the scale of the proposal and its relationship to the surrounding area...*'.

4.3.17 The Proposed Development would be consistent with the policies within this chapter of the SPP, having the capacity to generate significant renewable electricity and fully utilise the potential of the area for the generation of renewable electricity.

Onshore Wind Farms

4.3.18 Specific policies relating to onshore wind farm development are set out in paragraphs 161-166, 170 and 174. Paragraph 169 of the SPP is referenced in paragraphs 4.3.9 and 4.3.10 above. Paragraph 161 requires all planning authorities to include a wind energy spatial framework within their development plans identifying areas most likely to be appropriate for onshore wind proposals. The methodology to be followed in producing wind energy spatial frameworks is set out in Table 1 (page 38) of the SPP. This identifies three groupings of areas for the purposes of producing wind energy spatial frameworks:

- Group 1: Areas where wind farms will not be acceptable (National Parks and National Scenic Areas);
- Group 2: Areas of significant protection (national and international designations; nationally important mapped environmental interests – wild land and areas of carbon rich soils, deep peat and priority peatland habitat; having regard to landform and other factors which restrict views out of settlements, areas within up to 2km of defined settlements); and
- Group 3: Areas with potential for wind farm development (all other areas).

4.3.19 Table 1 notes that wind farms in group 2 areas '*may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation*'.

4.3.20 In relation to the spatial framework methodology identified above, the Development Site would fall within group 2, as the availability of group 3 land is limited as much of the Isles is covered by Ministry of Defence (MoD) radar constraints and important natural designations. The Development Site is categorised as being within group 2 by virtue of its location in an area containing deep peat and carbon rich soils and due to being within 2km of the settlement of Stornoway (closest turbine 1.8km away). The implications of this for the Proposed Development are discussed further within the Development Plan Chapter below (**Chapter 5**).

4.3.21 Paragraph 170 of the SPP seeks to ensure that wind farms are sited in appropriate locations in perpetuity. This paragraph states: '*Areas identified for wind farms should be suitable for use in perpetuity. Consents may be time-limited but wind farms should nevertheless be sited and designed to ensure impacts are minimised and to protect an acceptable level of amenity for adjacent communities*'.

4.3.22 The Proposed Development has been designed to take account of Paragraph 170 of the SPP and the design evolution is set out in **AI Chapter 3**. The **EIA Report, AI** and the assessment in this revised Planning Statement have been undertaken on the basis of the Proposed Development being sited in perpetuity. However, reversibility is a positive feature of onshore wind developments and some weight should be given to this as a positive attribute of this type of development. This is consistent with the approach taken by the Reporter in the Inquiry Report for the Caplich Wind Farm, who noted that '*it remains a relevant consideration that the adverse effects I have described are only proposed to endure for a maximum of 30 years and that after that time, the site would be restored*'.

Conclusions on National Planning Policy

4.3.23 The Consented Development meets the requirements set out in NPF3 and the SPP which confirm that the planning system has a key role in tackling climate change and working towards achieving the Government's target for renewable energy generation. They recognise the role of the planning system in facilitating new development of electricity, including onshore wind energy. Furthermore, national and international policy frameworks are strongly supportive of renewable energy technologies to mitigate against the impacts of climate chance and provide enhanced energy security.

4.3.24 The Scottish Programme for Government is published every year at the beginning of September and sets out the actions we will take in the coming year and beyond. In 2019, the First Minister stated that planning policy will undergo a fundamental review, headlining the need for planning policy to more radically reduce emissions. The First Minister highlighted that the global climate emergency means that the time is right for wide ranging debate on more radical planning policy options. In summary, it is more than what is required by the SPP and NPF3, there is a real need to go further than this in policy terms, at a far greater rate.

4.3.25 The Proposed Development would increase the amount of renewable energy directly contributing to the national and international policy goals to a materially greater extent than the Consented Development. The Proposed Development would optimise the output at the Development Site resulting in more renewable electricity generation for minimal change in impact.

4.3.26 It is considered that the Proposed Development benefits from the presumption in favour of development that contributes to sustainable development. Furthermore, the Proposed Development is considered to be acceptable when considered against the development management considerations set out within the SPP. The Proposed Development therefore draws considerable support from both NPF3 and the SPP.

5. The Development Plan

5.1 Introduction

5.1.1 Though there is no legal requirement to determine the Application in accordance with the relevant development plan, this Chapter provides an assessment of the Proposed Development against the relevant policies. The development plan for the Development Site comprises the Outer Hebrides Local Development Plan (2018). This Chapter also considers the Proposed Development in terms of the statutory Supplementary Guidance on Wind Energy Development published in 2018 (the SPG). This Chapter considers the relevant policies and assesses the conformity of the Proposed Development, drawing on the conclusions reached in the EIA.

5.2 Outer Hebrides Local Development Plan (2018)

5.2.1 The relevant Development Plan that applies to the location of the Proposed Development is the Outer Hebrides Local Development Plan (LDP) which was adopted in November 2018. The LDP outlines through planning policies what is required of new developments in order for them to be considered acceptable and receive approval. The planning policies that have been considered as part of this revised Planning Statement are set out in **Table 5.1**. The policy of greatest relevance to the Proposed Development is EI8 Energy and Heat Resources as it is directed towards wind farm developments and establishes a set of criteria such developments need to meet (and is supported by the SPG, which is also of considerable importance when considering the Proposed Development).

Table 5.1 Summary Table of Relevant LDP Policies

Policy Reference	Summary
DS1: Development Strategy	The policy allows for the creation of developments in remote areas that sustainably develop a natural resource whilst protecting and enhancing distinctive character landscapes.
PD2: Car Parking and Roads Layout	This policy establishes a set of criteria for new car parking spaces and roads, ensuring such elements of developments are suitable and safe.
PD5: Open Space and Outdoor Sports Facilities	This policy seeks to protect existing functional open space and allotments within the main settlements and supports the provision of new or enhanced open spaces.
PD6: Compatibility of Neighbouring Uses	This policy requires development proposals to ensure they do not have any unacceptable adverse impacts upon the amenity of neighbouring uses and mitigate their impact as much as possible.
ED5: Minerals	This policy allows for the creation of borrow pits to allow the extraction of minerals near to or on the site of associated development (wind farm development is cited as a specific example) so long as their creation and use can be justified and are accompanied by a full restoration and aftercare plan.
EI 1: Flooding	This policy requires development proposals to be flood resilient and not increase the likelihood of flooding in its surroundings and incorporate sustainable flood management measures where needed.
EI 2: Water and Waste Water	This policy requires development proposals to incorporate SuDS to ensure water and waste water are managed in a sustainable manner.

Policy Reference	Summary
EI 3: Water Environment	This policy requires development proposals to avoid having an adverse impact on the water environment.
EI 5: Soils	This policy requires development proposals to be designed to minimise their adverse impact on soils. Major developments are also required to demonstrate how they have avoided disturbing carbon rich soils as much as possible.
EI 7: Countryside and Coastal Access	This policy requires development proposals do not reduce the accessibility of the Hebridean Way and Core Path network.
EI 8: Energy and Heat Resources	This policy allows for the creation of new energy generating developments contingent upon them meeting several criteria to ensure such developments are sustainable and robust.
EI 9: Transport Infrastructure	This policy seeks to protect and enhance important transport infrastructure elements within the Outer Hebrides and provide criteria for the creation of new transport infrastructure and traffic management measures.
EI 11: Safeguarding	This policy ensures the relevant agencies are consulted upon with regard to safeguarding and consultation zones.
EI 12: Developer Contributions	This policy allows CnES to potential require developer contributions that are proportionate to development proposals and their consequences.
NBH1: Landscape	This policy affords protection to the landscapes and important landscape features of the Outer Hebrides. Development proposals with unacceptable significant landscape or visual impacts would not be permitted.
NBH2: Natural Heritage	This policy affords protection to the natural assets of the Outer Hebrides and ensures development proposals reduce and mitigate their potential effects on such assets.
NBH3: Trees and Woodland	This policy affords protection to trees and woodlands with in the Outer Hebrides, requiring development proposals to incorporate establishes trees within their design and to avoid the removal of trees and woodlands without considerable justification.
NBH4: Built Heritage	This policy affords protection to the built heritage assets of the Outer Hebrides.
NBH 5: Archaeology	This policy affords protection to the archaeological assets of the Outer Hebrides.
NBH 6: Historic Areas	This policy affords protection to the historical assets of the Outer Hebrides.
Supplementary Guidance for Wind Energy Development	This SPG seeks to support Policy EI 8 Energy and Heat Resources of the LDP. The SPG provides further guidance in order to assist in the planning of wind energy developments within the Outer Hebrides.

5.3 Development Strategy

5.3.1 Policy DS1 establishes the overall spatial strategy to guide development (i.e. where development should and should not be located). The principal policy objective is to support and promote the strategic role of Stornoway within the Outer Hebrides by accommodating development which facilitates regeneration, successful placemaking and infrastructure to support growth. The Policy sets out a number of criteria that development proposals should address, depending on their location. As the Proposed Development is within a "Remote Area" the following applies:

> *"Proposals for development will only be acceptable where a locational need has been demonstrated and at least one of the following is met:*

c) it is for, or associated with, the sustainable development of a natural resource[11] and accords with any relevant Supplementary Guidance and associated spatial strategy; or….Proposals should avoid significant adverse effects on the area's ecological and landscape attributes, including the special qualities of NSAs and wildness characteristics of WLAs."* . The following sections demonstrate that the Proposed Development would be consistent with the development strategy for the Outer Hebrides and would accord with the Policy's requirements.

5.4 Renewable Energy

5.4.1 LDP Policy EI 8 (Energy and Heat Resources) states:

- The Comhairle will support proposals that contribute to meeting the targets and objectives of the National Planning Framework 3, the Climate Change Act, and the National Renewables Infrastructure Plan in relation to electricity grid reinforcement, infrastructure and renewable energy generation;
- Development proposals for all scales of onshore wind energy development will be assessed against the Supplementary Guidance for Wind Energy Development;
- The Comhairle supports the principle of wind farm development in *Areas with Potential for Wind Farms* (SG Map 1) subject to a satisfactory assessment against other policies in this plan and the Supplementary Guidance. Many of these areas, particularly in the Uists, will however be constrained by MoD radar. The Supplementary Guidance will give further details of the radar constraints;
- The Comhairle will also consider wind farm development in *Areas of Constraint, with potential in certain circumstances* (Map 1) subject to a satisfactory assessment against other policies in this plan and the Supplementary Guidance;
- The Comhairle will not support wind farm developments in *Areas Unacceptable for Wind Farms* (Map 1)…
- …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. Conditions and, where necessary, a planning agreement may be used to control the detail of the development. Non-permanent elements of a development will be granted permission consistent with their lifespan and/or projected period of use.

5.4.2 The Policy gives support to proposals that contribute to meeting the targets and objectives of NPF3 and the Climate Change Act. **Chapters 3** and **4** of this revised Planning Statement establish that the Proposed Development would make a valuable contribution to the renewables and greenhouse gas emission targets. The Proposed Development is therefore in accordance with Policy EI 8 in this regard.

5.4.3 The CnES has prepared a Spatial Strategy to guide wind farms, determined by combining SPP's spatial framework (referred to in **Table 5.1**) and a number of other constraints and considerations. The Spatial Strategy identifies a series of areas with regards to the potential development of wind farms:

1. Areas with Potential for Wind Farms;

[11] *Development of 'natural resources' for the purposes of this policy means the exploitation of naturally occurring resources (e.g. minerals, oil, plants, animals), including energy resources (e.g. wind, sunlight, water).

2. Areas of Constraint (Wind Farms may be appropriate in some circumstances);
3. Areas Unacceptable for Wind Farms.

5.4.4 The Development Site falls within a group 2 area by virtue of falling within an area of deep peat, carbon rich soils and being within 2km of the settlement of Stornoway. It also falls into this group due to the very limited amount of land designated as group 3. The Policy confirms that proposals will be considered in Areas of Constraint, with potential in certain circumstances subject to a satisfactory assessment against other policies in the LDP and the SPG.

5.4.5 The Policy refers to the SPG and other policies in the Plan for the factors to be taken into account when determining whether proposals for wind farm developments are acceptable. The factors are considered in the sections below, and demonstrate that the Proposed Development accords with the Development Plan Spatial Strategy for wind farms, the Development Plan policies and the requirements of the SPG, including in terms of its impacts on carbon rich soils.

5.4.6 The Proposed Development is considered to accord with the broad principles established in Policy EI 8, including the CnES Spatial Strategy for wind farm developments.

5.5 Community Amenity

5.5.1 Policy PD6 requires development proposals to ensure that there is no unacceptable adverse impact on the amenity of neighbouring uses. The SPG requires applications for wind farms to be accompanied by evidence that proposals will have no unacceptable impact on community amenity in relation to a number of considerations (page 11).

Noise

5.5.2 The SPG sets criteria for the maximum level of noise wind farm developments can produce both on their own and cumulatively. The assessment in **EIA Chapter 12** was undertaken in accordance with best practice, including the methodologies outlined in the publications "*The Assessment and Rating of Noise from Wind Farms*".

5.5.3 **EIA Chapter 12** highlights the eight closest noise sensitive receptors (See **AI Figure 12.1**) to the Proposed Development which are the same residencies that were identified for the Consented Development.

5.5.4 The EIA Report found that the operational noise created by the Proposed Development in isolation and cumulatively with other consented wind farms (including from construction traffic) would be consistent with the noise levels set out in the SPG and with national guidance on noise levels for wind farms, which are designed to ensure that noise is not a nuisance for nearby properties. The assessment of the potential effects resulting from noise due to the construction traffic from the Proposed Development (both construction options, with borrow pits or without borrow pits), showed that they would both result in some minor impacts but none that would be significant to the eight identified receptors.

5.5.5 The Proposed Development therefore is in accordance with PD6 and Policy EI 8 and the SPG with regard to its potential noise effects.

Electromagnetic Interference

5.5.6 The access tracks that would be constructed as part of the Proposed Development have the potential to affect a SHEPD 33kV pole mounted power line, and the underground cable linking Beinn Greidaig Wind Farm to the SHEPD substation. There is also potential for the Scottish Water

pipework located near to the Development Site's entrances onto the A859 to be affected. However, the EIA Report outlines that these potential effects can be mitigated through consulting with SHEPD and Scottish Water and through the application of relevant H&S guidance.

5.5.7 There are expected to be no effects on nearby telecommunication and television receptors during the construction of the Proposed Development.

5.5.8 During the operation of the Proposed Development the turbines could have some potential effects on telecommunication assets in the area, and in particular on links that currently cross the Development Site. These potential effects would be mitigated through micro siting of turbines away from existing telecommunications links, or through re-routing if agreement is reached with the link owner, ensuring the operation of the Proposed Development would not have any effects upon these telecommunication assets.

5.5.9 It is considered unlikely that the Proposed Development would affect television reception. However, a condition can be used to require the operator to investigate complaints about TV reception interference and to rectify where reasonable. This is set out in **EIA Chapter 16**.

5.5.10 In summary, all of the potential effects due to the construction and operation of the Proposed Development are minimal and easily mitigatable, ensuring surrounding telecommunication, television reception, power lines (and associated elements) and pipework would not be negatively affected.

Shadow Flicker

5.5.11 The SPG requires wind farm developments to ensure they would have no unacceptable significant adverse impact on the amenity of local communities due to potential shadow flicker**. EIA Chapter 15** found that there would be no shadow flicker effects from Proposed Development due to there being no residential properties located within 1,550m of the proposed turbine locations. Two operational wind farms are located close to the Proposed Development Site: Beinn Greidaig and Pentland Road. No cumulative shadow flicker effects have been identified due to there being no residential properties located within the areas where these two operational wind farms shadow flicker study areas overlap with the Proposed Development's. Due to the Proposed Development's operation not creating any shadow flicker effects at all, it is considered that it conforms to the shadow flicker requirements of the SPG.

Public Access

5.5.12 The SPG states that CnES will seek to maintain and improve public access and enjoyment, in line with LDP Policies EI 7 and PD 5. Policy EI 7 requires development proposals to be located to ensure the Hebridean Way, the Core Path network and established and functional access points to water are kept free of obstruction. The Policy encourages proposals for improvements to, and expansion of, the existing path network (including the improvement of access to the Core Path network) that facilitates greater access and enjoyment of key natural and built heritage resources. Policy PD 5 seeks to safeguard, enhance or increase open spaces. As the supporting text notes, this is most likely to be relevant to the main settlements, and is not considered to be a Policy of relevance to the Proposed Development.

5.5.13 The SPG states that turbines should be located at least a minimum distance equivalent to the height of the turbine to blade tip plus 10% from Core Paths and public roads. Although not a Core Path, CnES advised in their response to the Scoping Report that the assessment of the Proposed Development should consider physical impacts on the Hebridean Way and indirect impacts such as views from these recreational trails and Core Paths.

5.5.14 In terms of standoff distances, the closest Core Path to a proposed turbine is Core Path 6 which is located 2.2km away and therefore greater than the standoff identified in the SPG. The closest proposed turbine to the Hebridean Way is 142m, which is less than the standoff distance identified in the SPG. The **EIA Report** identifies that the Proposed Development would not obstruct the use of any Core Paths or the Hebridean Way during construction, operation or decommissioning.

5.5.15 The Proposed Development would result in the creation of approximately 28.7km of new tracks, Four bridges and 12 culverts expanding the countryside path network and therefore public access on the Isle of Lewis. Whilst it is recognised that the Hebridean Way is in close proximity to the Proposed Development there would be wider benefits of additional public access across the Development Site which would outweigh this proximity issue. Therefore the Proposed Development is considered to be broadly in accordance with Policy EI 7.

Conclusion on Community Amenity

5.5.16 The factors identified within the SPG have been considered and assessed in the preceding sections and assessed in **EIA Chapter 6** and **EIA Chapter 14**. The Proposed Development would not have an unacceptable effect on community amenity during its construction, operation or decommissioning either stand alone or cumulatively with other existing or consented wind farms. Furthermore, the new access tracks would provide enhanced public access for recreational use across the Development Site. The Proposed Development is therefore considered to accord with the relevant policies in the LDP and the requirements of the SPG in this regard.

5.6 Socio-economic

5.6.1 The relevant LDP policy is EI 8 Energy and Heat Resources. The SPG provides further support for SPP and its aim for *"local and community socio-economic benefits such as employment, associated business and supply chain opportunities"* to be created. The SPG is clear that wind farms within the Outer Hebrides should seek to provide a *"positive net economic impact occurring directly within the Outer Hebrides."*

5.6.2 Policy EI 8 seeks to ensure that Wind Farm developments contribute to the local economy. The SPG supports these policies, reiterating that '*the Comhairle will seek to secure positive net economic impact accruing directly within the Outer Hebrides*'.

5.6.3 **EIA Chapter 14** considers the following socio-economic receptors:

- Population;
- Employment and economy;
- Tourism and Recreation;
- Health; and
- Land Use.

5.6.4 **EIA Chapter 14** considers that the capital cost of constructing the Proposed Development could equate to investment estimated to be up to between £229m and £353m. During the construction phase, the Proposed Development could directly support up to 307 Full Time Equivalent (FTE) local jobs, and up to 921.3 FTE jobs within Scotland for the duration of the construction phase (about 30 months). During its operational phase, employment related to operations and maintenance for the Proposed Development could directly support up to 208.3 FTE jobs, of which up to 87.7 FTE jobs could be local and up to 120.6 FTE jobs would be likely to be within Scotland. Other employment is likely to be supported or generated through induced and indirect economic and employment

effects throughout all phases of the Proposed Development. Details of how the figures stated above have been calculated are set out in **EIA Chapter 14**.

5.6.5 The Proposed Development would have a significant positive effect on the economy of the Council Wards of Steornahagh a Tuath, Sgir' Uige Agus Ceann a Tuath nan Loch and Loch a Tuath. The potential jobs created during construction could lead to some workers who have left the Outer Hebrides returning and potentially encourage further development in the area, though to what extent this would occur is not possible to predict. Construction of the Proposed Development would also contribute to the local economy through indirect and spin off jobs. The Proposed Development would therefore make a significant contribution to sustainable economic growth in the local area.

5.6.6 The Proposed Development has been calculated as having a total footprint (that is the area subject to direct habitat loss and which could not be restored for at least the lifetime of the wind farm) of 35.23ha (with an additional felling of 36.1ha of coniferous trees). Parts of the Development Site are used for angling and the grazing of livestock/crofting. Once operational, these uses would continue over much of the Development Site.

5.6.7 Crofting law is set out in the Crofters (Scotland) Act 1993 (as amended by the Crofting Reform etc Act 2007). Compensatory payments would accrue to crofting townships where land has been affected by the siting of wind turbines or access tracks on common grazing land. The Land Court would ultimately determine the appropriate level of compensation. The exact amount of payment is still to be determined, however the compensatory payments would provide a benefit to those who have rights to graze on the Development Site and so this is considered to be a benefit to the local area.

5.6.8 The Applicant has committed to providing a Community Benefit Fund of £5,000 (index-linked) per MW on an annual basis over the life time of the project. This money could be used by locals for the funding of community based activities (e.g. playgrounds and parks) or could be used to provide business support to create more jobs for the local area. Furthermore, the Applicant has committed to making up 20% of the Proposed Development available for Community Ownership. Discussions with CnES and the Stornoway Trust remain positive and ongoing.

5.6.9 There are anticipated to be significant benefits on the local economy from the construction of the Proposed Development. Further benefits would be accrued during operation in terms of employment and knock economic effects as well as compensation payments and community benefit payments. As a result, the Proposed Development would accord with Policy EI 8 and the requirements of the SPG.

5.7 Landscape and Visual Impact

Policy Context

5.7.1 Policy NBH1 requires development proposals to relate to the specific landscape and visual characteristics of the local area, ensuring that the overall integrity of landscape character is maintained. The Policy confirms that the Western Isles Landscape Character Assessment will be taken into account when determining planning applications. The Policy requires that the Proposed Development should not have an unacceptable significant landscape or visual impact; where this is the case, the Applicant will be required to provide mitigation measures demonstrating how a satisfactory landscape and visual fit can be achieved.

5.7.2 The SPG confirms that, in line with Policy NBH1, developers will be expected to demonstrate that wind farm proposals and associated infrastructure (including access tracks, grid connection, control equipment) will not have an unacceptable significant visual or landscape impact on the character of

the Outer Hebrides (including cumulative) and that good siting and design has been utilised to ensure impacts are limited.

5.7.3 The SPG advises that proposals for wind farms will be assessed for their likely impact on a range of factors:

- Key characteristics of landscape character types, as identified within the Landscape Capacity Study for Onshore Wind Energy Developments in the Western Isles;
- 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 CnES.

5.7.4 The SPG states that wind farms should be located at a distance of at least 2km from settlements. It makes reference to areas of Low Landscape Capacity; this is not relevant to the Proposed Development as it does not lie within such an area. Policy NBH1 and the SPG also set out requirements for proposals affecting National Scenic Areas and Wild Land Areas. It was agreed through the scoping process that there would not be significant effects on Wild Land Areas and these have not been included in the landscape and visual impact assessment. Consequently no issue arises in terms of policy relating to Wild Land Areas.

Assessment

5.7.5 Given their size and scale it is almost inevitable that commercial-scale wind turbines would have an effect on the landscape and visual baseline of any area within which they are located. In recognition of this, landscape and visual considerations have provided substantial influence on the scheme design through consideration of alternative layouts and turbine heights and numbers. **AI Chapter 3** provides more detail of the wind farm design strategy and design evolution, including:

- Consideration has been given to overall turbine height with regards to key visual receptors, with the design development comprising a two height option;
- The turbine heights of the 10 turbines located in the east of the Development Site would be limited to a maximum of 156m to blade tip, to reduce their impact when viewed from Stornoway (including Greater Stornoway) and other receptors in the east and northeast;
- The turbine layout has been largely contained within the currently consented turbine area, (except in the northwest due to the greater available moorland and reduced number of surrounding receptors), with proposed turbines set-back as far as practical from the outer edge of Greater Stornoway;
- The nearest turbine would be 1.8km from the nearest residential property but would be 3.2km west of the core settlement of Stornoway. This distance is greater than the Consented Development, which had a setback of 1.5km between turbines and the nearest residential property and 2.5km from the core settlement of Stornoway;
- The assessment results indicate that the spatial extent of significant effects for both landscape and visual would be the same as the Consented Development (5km and 14km respectively).

Effects on Designated Landscapes

5.7.6 The Proposed Development is not within any area designated for landscape or scenic value. There is one national landscape designation within the 35km Study Area which is considered in the

assessment – South Lewis, Harris and North Uist National Scenic Area (NSA). The assessment has considered the effects of the Proposed Development on the overall integrity and special qualities for which the NSA is designated, having regard to the SNH Commissioned Report 'The Special Qualities of the National Scenic Areas' (2010). Table 6.11 in **EIA Chapter 6** sets out each of the special qualities identified in the SNH report and assesses the Proposed Development against them. This assessment concludes that the special qualities and integrity of the NSA would not be significantly affected by the Proposed Development, either alone or when considered cumulatively with other existing or consented wind farms.

Effects on Landscape Character

5.7.7 The Development Site is located within the Boggy Moor 1 Landscape Character Type (LCT) as identified in the 'Landscape Capacity Study for Onshore Wind Energy Development in the Western Isles' report.

5.7.8 The landscape and visual impact assessment contained within the of the **EIA Chapter 6** concludes that the most notable effects would occur within an area extending 1km from each turbine and up to 2-3km in the east and southeast, 3km in the north and south, and 5km in the west. The Consented Development was assessed as affecting landscape character within an approximate 5km radius of the Proposed Development. There would be localised significant effects on the landscape character type, although not with regard to the wider context of the landscape character type as present on the Isle of Lewis. As such, the EIA Report concludes that the effects on the Boggy Moor 1 LCT as a whole would not be significant.

5.7.9 Overall, the Proposed Development would result in a significant cumulative effect on landscape character, affecting an area within 1-5km of the proposed turbines and over a period of approximately 10-15 years, based on the currently consented time periods for the other wind farm developments considered. Other areas of the Boggy Moor 1 LCT would be not be significantly affected and the cumulative effects on the LCT as a whole would not be significant.

5.7.10 There would also be some localised significant effects on small areas of adjoining LCTs, which was also the case for the Consented Development. Table 6.10 in **EIA Chapter 6** sets out the effects on surrounding LCTs.

Aviation Warning Lights

5.7.11 Aviation warning lights would be required for all 35 turbines of the Proposed Development due to civil aviation requirements. The landscape and visual impact assessment has assumed a worst case scenario, with one light positioned on each of the turbine nacelles and three further lights positioned on three sides of the tower, at mid-point of the tower.

5.7.12 On this basis, **EIA Chapter 6** concludes that there would be a significant effect on the night-time character of the Boggy Moor 1 LCT within 3-5km of the Proposed Development. However, this landscape is currently affected by the lights from four existing wind energy developments, the Eitseal transmission mast and the numerous lights at Stornoway and environs that result from industry/business and commercial lighting, residential lights and street lighting, Stornoway Airport, and the main roads and mobile lighting associated with different modes of transport (road traffic, ferries and aircraft). The Boggy Moor 1 LCT is not currently valued (in terms of designation or tourist / visitor guides) and its existing 'partly lit' night-time character is markedly different to the 'unlit' night-time character of the Boggy Moor 1 LCT which occurs in most other areas of the Isle of Lewis. No other areas of landscape character or the South Lewis, Harris and North Uist NSA would be significantly affected by lighting from the Proposed Development during the construction, operation or decommissioning periods.

Visual Effects

5.7.13 The Proposed Development would give rise to visual effects during construction, operation and decommissioning. During construction there would be construction traffic at the site entrances as well as vehicle and crane movement and the erection of the turbines on site. Ground level construction activities at the temporary construction compounds, storage areas, substations and borrow pits would tend to be screened by landform or otherwise partially visible from more limited areas. Visibility of these activities would be present from parts of the A859, A858, Hebridean Way and Timeless Way. Beyond the immediate Development Site, visibility of these features would mainly be limited to higher ground overlooking the Development Site. Although activity on site would be less during the operational phase, it would be during this period, that the majority of significant visual effects would be experienced as a result of the proposed turbines. During the decommissioning period the Development Site would return to a 'construction site' for a temporary period, and the level of effect would be variable over the Development Site and according to the phase of activity.

Settlements

5.7.14 Settlements, as defined in the Outer Hebrides Local Development Plan, within 15km of the Development Site have been included in the landscape and visual impact assessment. The visual effects likely to be experienced from settlements include consideration of residential areas, the public realm and public open spaces within the settlement boundaries that would be frequented by people.

5.7.15 Table 6.3 in **EIA Chapter 6** sets out the viewpoints included within the Viewpoint Analysis. **EIA Chapter 6** has identified significant visual effects in respect of some settlements as a result of the range of views, aviation lighting and/or cumulative effects with existing and/or consented turbines. However, no settlements would experience significant effects from the Proposed Development that would not also experience significant effects from the Consented Development. Other important points to note are that only certain parts of the settlement would experience significant effects. Intervening topography or vegetation and orientation of properties would reduce the visual effects of the Proposed Development. Furthermore, in many cases, the Proposed Development would appear in the context of other man-made development including houses, existing turbines, telegraph poles, chimney stacks and street lighting posts, which would assist in screening parts of the Proposed Development in some areas. Significant effects would occur at:

- A very small number of locations in the east at Plasterfield and Oliver's Brae equating to 6% of Stornoway Core Settlement;
- Greater Stornoway Main Settlement – North (Newmarket, Newvalley, Marybank, Maryhill);
- The centre and east of Ranais;
- The west of the B895 at Tong;
- Greater Stornoway Main Settlement – East (including Steinis, Sanndabhaig, Park End), Tolm and Mealabost);
- Parts of Coll and Col Uarach;
- Knock (An Cnoc) (including Suardail and Aiginis) (on the Eye Peninsula / An Rubha);
- Gearraidh Bhaird (Garyvard), Kershader and Tabost;
- Upper Garrabost;
- Shulishader (Sulaisaidar) (on the Eye Peninsula / An Rubha).

Visual Effects on Residential Properties

5.7.16 The assessment of visual effects on views from residential properties within 2km (8 properties) and from individual properties and/or clusters of properties just beyond 2km (25 properties) of the Development Site is undertaken via a residential visual amenity assessment, the detail of which is contained in **EIA Appendix 6C**.

5.7.17 The residential visual amenity assessment concludes that all eight properties within 2km would be subject to a significant visual effect (property and/or garden) (see **EIA Appendix 6C**). It also concludes that 14 of the properties just beyond 2km would be subject to visual effects which are considered significant (Old Farm House, No. 16B – Croft House, Macs Croft, Sporting Lodge, No. 10 – Loch View, No. 6A – Lochan, No. 20 (Newvalley), No. 3 (A859), No. 5 – Drumrae, Riverside, No.1 – Last House, No. 1a – River View House, No. 2A (Newmarket) and No. 2 – Gleann an t'Sagairt), and one property (No. 18 (A859)) would be significantly affected only during the construction and decommissioning phases.

5.7.18 An approach to dealing with residential amenity was set out in an appeal case determined by the planning inspector David Lavender. This has become known as the 'Lavender Test' and is often used to determine whether effects on residential visual amenity are unacceptable. In Appeal Decision APP/D0840/A/09/2103026 he stated:

"*I do not consider that simply being able to see a turbine or turbines from a particular window or part of the garden of a house is sufficient reason to find the visual impact unacceptable (even though a particular occupier might find it objectionable). However, when turbines are present in such number, size and proximity that they represent an unpleasantly overwhelming and unavoidable presence in main views from a house or garden, there is every likelihood that the property concerned would come to be widely regarded as an unattractive (rather than simply less attractive, but not necessarily uninhabitable) place in which to live.*"

5.7.19 The Lavender Test means that the experience of a significant view of the Proposed Development is not the same as an unacceptable effect in planning terms, which is generally concerned with the public interest. Rather, the test is whether the effect would be so severe as to make the properties undesirable places in which to live.

5.7.20 The residential visual amenity assessment concludes that the Proposed Development would not have an overbearing effect or otherwise affect the living standards of individual properties such that any of these would become an unattractive place to live (as opposed to less attractive) when judged objectively, and in the public interest. This is due to a combination of factors such as the intervening distance, screening by intervening landform, vegetation and/or built-form, other man-made development in the views and use/orientation of the property. This is the case both on an individual and cumulative basis.

Visual Effects on Transport Routes

5.7.21 The landscape and visual impact assessment concludes that significant visual effects would occur out to distances of around 15km (14km for the Consented Development) due to the relatively open landscape. The main transport routes including A and B class roads and ferry routes to Stornoway harbour have been assessed. The main visual effects would be experienced transiently by users of the:

- A858 (between Marybank and Loch nan Eilean, approximately 8km length);
- A859 (between Creed Bridge and north of Liurbost, approximately 6km of its total 51km length);

- A866 (parts of the route between Oliver's Brae and Shulishader, approximately 10km length for west bound users);
- Stornoway – Ullapool Ferry Route (between south of Melbost to within Cala Steornabhaig, approximately 5km of its total 82km length);
- B897 (between the junction of the A859 and junction of the road to Grimshader, approximately 3.5km length);
- B895 (between south of Tong and Coll, approximately 7km of its length); and
- Pentland Road (between Loch an Tobair and the road junction with the A858, approximately 6km of its total 16km length for east bound users).

5.7.22 These roads extend within relatively close proximity to the Development Site; hence views of the proposed turbines would be from a relatively close distance to road users with little protection afforded from screening. This was also the case with the Consented Development and there are no receptors affected by the Proposed Development that were not also affected to similar degree by the Consented Development.

Visual Effects on Views from Recreational Routes

5.7.23 **EIA Chapter 6** has considered the potential visual effects likely to be experienced by people (walkers/cyclists/horse riders/joggers/others) on recreational routes within the Study Area, taking into account aviation lighting (worst case) on the proposed turbines and cumulative effects.

5.7.24 Significant daytime visual effects would be experienced from the following recreational routes:

- Core Path 6 (from elevated parts of the route);
- Sustrans cycle route 780 (the combined effect with the existing Baile an Truiseil, Horshader and Monan turbines);
- Hebridean Way (8km between Marybank and Loch nan Eilean and the combined effect with the Beinn Ghrideag, Pentland Road, Monan and Muaitheabhal turbines); and
- Timeless Way (between west of Marybank and Pentland Road, and between northeast of Stornoway and Coll, also the combined effect with the Beinn Ghrideag, Pentland Road, Horshader, Monan, North Tolsta and Druim Leathann turbines).

5.7.25 Mitigating factors include the landscape setting of the Proposed Development which would be seen within a large-scale landscape with characteristics that make it suitable for the accommodation of large wind farm development and that the effects would be experienced over a relatively short distance.

Visual Effects on Views from Recreational and Tourist Destinations

5.7.26 Significant visual effects would be experienced from three local tourist attractions or destinations within 15km of the Proposed Development:

- Stornoway Golf Club/Lews Castle and Lady Lever Park Garden and Designated Landscape;
- Lewis War Memorial; and
- Iolaire Memorial.

5.7.27 In all cases, the Proposed Development would be seen within a large-scale landscape setting, with characteristics that make it suitable for the accommodation of large wind farm development. This is

confirmed by the SNH document 'Landscape Capacity Study for Onshore Wind Energy Developments in the Western Isles', which concludes that the scale of the large expanses of Boggy Moor 1 LCT could physically accommodate the largest (wind farm) typology. It Is further confirmed by the Consented Development, which demonstrates that the Development Site is suitable for a large scale wind farm development.

Lewis War Memorial

5.7.28 The Lewis War Memorial, erected in 1920 to commemorate the end of the First World War, stands on a low hillock (Cnoc nan Uan) on the northern edge of Stornoway town within an area of open heathland. The Memorial takes the form of a Scottish Baronial Tower which rises to a height of approximately 26m. Panoramic views can be gained from the tower out to the surrounding landscape in all directions. However, due to the design composition (which utilises the existing Pentland Road and Beinn Ghideag wind farms as part of the composition), and the openness and large-scale of the receiving landscape, the Proposed Development, whilst appearing prominent, could be reasonably well accommodated in these panoramic views from the War Memorial. Furthermore, although all of the proposed turbines would be theoretically visible, the Proposed Development would only affect a 90-180 angle of view from the Memorial. The visitor experience of the Lewis War Memorial would be to view in the opposite direction, towards Stornoway, the Eye Peninsula and the coastline, and away from the Proposed Development.

Iolaire Memorial

5.7.29 The Iolaire Memorial is a memorial to the victims of the wreck of the Iolaire on New Years' Day 1919 and has strong local significance. The Memorial comprises an inscribed stone pillar located 3km southwest of Stornoway town overlooking the Beasts of Holm, the rocks upon which the Iolaire was wrecked (this location being marked with a stone pillar of its own). The Proposed Development would be visible in views inward to Lewis past Stornoway harbour in an arc from west by northwest to the northwest. In these views, they would comprise a background element of a long-distance view (the closest turbine, T7 is 6.8km west of the Memorial). The visitor experience of visiting the Iolaire Memorial would be to view in the direction of the ship wreck in the sea to the south, and away from the Proposed Development. These effects would be similar to the Consented Development.

Lews Castle

5.7.30 Lews Castle, a Category A listed building, was constructed in the mid-19th century and forms part of the Lews Castle and Lady Lever Park Garden and Designated Landscape, sitting within enclosed policy woodland. Westerly views towards the Proposed Development would be generally screened by established woodland. The LVIA identifies that there would be localised areas (i.e. more elevated vantage points/areas of lesser tree cover) from western and southern parts of the Garden and Designated Landscape where there would be more open views of the Proposed Development. The turbines would be visible in close proximity from these small sections of the route, however, the views would be wide and panoramic, and seen in the context of other existing man-made elements with the primary views remaining towards the settlement of Stornoway and the sea. However, these effects would not impact on those areas of the Garden and Designated Landscape which constitute a key part of the reason for the designation.

5.7.31 The parkland of the Lady Lever Park forms the Stornoway Golf Course. In terms of the golf club, the main reason that people use this receptor is to play golf rather than viewing the surrounding landscape.

Visual Effects on Anglers

5.7.32 The Proposed Development would be visible to anglers from locations within approximately 6km wherever there are clear, unobstructed views. However, the Proposed Development would not prevent fishing activities from taking place.

Aviation Warning Lights

5.7.33 Significant night-time visual effects would affect views from the following receptor locations:

- Elevated areas of the Stornoway Core Settlement, Greater Stornoway Main Settlement including elevated areas of the Stornoway Golf Club, Gallows Hill in the Lews Castle/Lady Lever Park Garden and Designated Landscape and the Lewis War Memorial;
- Stornoway East and the Iolaire Memorial;
- The western part of the Eye Peninsula including the settlements of An Cnoc and views from the A866 and ferry route within approximately 10km; and
- Part of the routes of the A859, A857, B897 and the Hebridean Way and Timeless Way long distance recreational routes (overlapping with the A858 and Pentland Road) within 5km of the Proposed Development.

5.7.34 All of these visual effects would be experienced in the context of existing light sources at Stornoway the Eitseal transmission mast and four existing wind energy developments within this same area.

Cumulative Effects

5.7.35 The landscape and visual impact assessment has considered the cumulative effects of the Proposed Development with existing and consented wind turbine schemes. The Proposed Development would be frequently viewed alongside the existing Beinn Ghrideag and Pentland Road wind farms due their close proximity, and with the existing Arnish Moor and Creed turbine in some views. However, cumulative effects with consented developments would be unlikely due to their geographic and spatial separation.

5.7.36 Overall, the Proposed Development would result in a significant cumulative effect on landscape character within 1-5km. Other areas of the Boggy Moorland - Boggy Moor 1 would not be significantly affected and the cumulative effects on the Boggy Moorland - Boggy Moor 1 as a whole would be not significant. The additional effect of the Proposed Development would not significantly affect the special qualities or integrity of the South Lewis, Harris and North Uist National Scenic Area.

Conclusion on Landscape and Visual Impact

5.7.37 The Proposed Development would be located in an area recognised as being the least sensitive to wind farm development and with the highest capacity for large scale wind farm development in the Outer Hebrides. The landscape in which the Proposed Development would be located is classified as Boggy Moorland which is described as simple, open and large scale - attributes that mean it is capable of accommodating large scale structures such as wind turbines.

5.7.38 The design of the Proposed Development has broadly maintained the geographical footprint of the Consented Development (with the exception to the northwest), with adjustments to the site layout, number, location and height of turbines. Although the turbines are greater in height, their careful siting in the landscape, including a greater stand off from Stornoway and residential properties, would mean that the overall effect would be broadly the same as that of the Consented Development, as illustrated by the visualisations and assessment in **Appendix 2**.

5.7.39 The presence of other existing and consented wind farms within this landscape acts as both a constraint and an opportunity, reducing sensitivity as this is already a landscape with wind farms and other man-made development. For these reasons the Proposed Development would not appear incongruous and would fit within this open, large-scale landscape.

5.7.40 The majority of significant effects as a result of the Proposed Development would be contained within the Boggy Moorland LCT, with small areas of significant effects on Gently Sloping Crofting, Rocky Moorland and Cnoc and Lochan LCTs, all within 5km.

5.7.41 There would be no significant effect on any designated landscapes, given the distance of the Proposed Development from the nearest designated area – the South Lewis, Harris and North Uist National Scenic Area.

5.7.42 While there would be significant effects on views from some settlements, transport and recreational routes and visitor destinations, the most notable effects would be contained within 6km of the Proposed Development. The temporal extent and magnitude of effects is broadly similar to the Consented Development, despite the increase in turbine size.

5.7.43 Whilst significant effects are predicted in terms of a number of residential properties, none of the residential properties would be affected in terms of their residential visual amenity, to such an extent that there would be an overbearing effect or otherwise affect the living standards of individual properties.

5.7.44 The proposed turbines are required to be lit for air safety reasons. This would be unavoidable given current aviation requirements for structures over 150m in height. Significant night-time visual effects would be restricted to areas within approximately 10km of the proposed turbines and would include parts of four settlements, seven transport routes, two regional recreational routes and three visitor destinations. All of these visual effects would be experienced in the context of existing light sources at Stornoway, the Eitseal transmission mast and four existing wind energy developments within this same area, such that lighting would not be a new feature in this landscape.

5.7.45 Cumulative effects would arise with the existing Beinn Ghrideag and Pentland Road wind farms due their close proximity, and with the existing Arnish Moor and Creed turbines in some views.

5.7.46 It is difficult for any large scale wind farm development to avoid significant landscape or visual effects from receptors within, or close to the turbines. However, in this case the effects are not considered to be unacceptable in landscape and visual terms due to the underlying large scale of the receiving landscape, as well as the relatively open and simple skylines within the area, which are considered to be of sufficient scale to accommodate a development on the scale proposed. Furthermore, the comparison assessment set out in **Appendix 2** sets out that the Proposed Development would result in similar effects to those of the Consented Development, which were considered acceptable.

5.7.47 It is considered that good siting and design has been deployed to minimise impacts such that those effects which have been identified, whilst significant in some areas, are not unacceptable and therefore no conflict arises with Policy NBH2 or the SPG.

5.8 Historic Environment

Policy Context

5.8.1 Relevant LDP policies are Policy NBH4 on Built Heritage; Policy NBH5 on Archaeology and Policy NBH6 on Historic Areas.

5.8.2 Policy NBH 4 has a focus on changes to listed buildings and use of materials and is only of limited relevance to the Proposed Development as it would not directly affect any listed building. The Policy provides that development that would have a substantial adverse impact on the historic significance of the built environment will only be permitted where it can be demonstrated that all reasonable measures will be taken to mitigate any loss of this significance; and any lost significance which cannot be mitigated is outweighed by the social, economic, environmental or safety benefits of the development.

5.8.3 Policy NBH 5 seeks to protect designated and non-designated archaeological sites. The archaeological importance of the Greater Callanish area is recognised by the Policy, with the supporting text identifying that views from and between the monuments and their presence in views from the surrounding landscape are an important part of the understanding, experience and appreciation of their setting. The Policy establishes a presumption in favour of the in-situ preservation of all scheduled archaeological remains. The policy identifies that proposals that may adversely impact on the cultural significance of scheduled archaeological remains or the integrity of their settings should be supported by measures that will mitigate any adverse effect on the archaeological significance, and where adverse effects cannot be mitigated a justification for the development that will outweigh any adverse effects should be provided.

5.8.4 Policy NBH 6 seeks to preserve and enhance historic areas – conservation areas and the St Kilda World Heritage Site. The Policy has a focus on proposals that are within conservation areas (which does not apply to the Proposed Development) but does state that proposals with a negative effect on a conservation area and its setting will not be permitted. Developments are also expected to preserve Lews Castle and Lady Lever Park as described in the Inventory of Gardens and Designed Landscapes.

5.8.5 The SPG states that developers will be expected to demonstrate that wind farm proposals and associated infrastructure will have no unacceptable significant adverse impact on the site, context and setting of historic environment assets; including designated and significant undesignated assets and areas. The SPG states that proposals that have the potential to impact on the setting of the Calanais complex 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 SPG also provides advice on what should be included in an assessment of the impacts on the historic environment.

Assessment

5.8.6 The potential for effects on the setting of any "statutory" heritage assets within a 15km radius of the Development Site have been assessed within **EIA Chapter 7**. The design of the Proposed Development considered impacts upon these statutory heritage assets, and turbines have been located to avoid the most significant impacts.

Built Heritage

5.8.7 **EIA Chapter 7** concludes that the only element of the built heritage where there would be a significant adverse effect would be the Category B Listed Lewis War Memorial. It is worth noting that the Consented Development was assessed as having a significant adverse effect for similar reasons.

5.8.8 The War Memorial is sited for prominence in the landscape, being located at the highest point of the town of Stornoway. The closest proposed turbine to the War Memorial would be approximately 3.3km to the west by southwest. Turbines would be clearly visible in views from the War Memorial in an arc from west to northwest. **EIA Chapter 7** identifies that views from the Memorial's hilltop location to the south and west would be affected by the Proposed Development, though the addition of turbines to these views would not necessarily form an adverse effect. As

established in **Section 5.7.27** above, the visitor experience of the Lewis War Memorial would be to view towards Stornoway, the Eye Peninsula and the coastline, and away from the Proposed Development. It is therefore considered that the location of the turbines would not detract from an understanding or appreciation of the War Memorial itself. It is worth noting that the Consented Development was assessed as having a significant adverse effect for the same reasons, however, the turbine locations within the Proposed Development would be located further from the War Memorial, thus helping to maintain the Memorial's visual prominence.

Archaeology

5.8.9 **EIA Chapter 7** concludes that, with the exception of the Druim Dubh Scheduled Monument, the Proposed Development would not result in significant effects on any heritage assets protected by Policy NBH 5.

5.8.10 There would be no direct effects on the Druim Dubh stone circle. The EIA Report has assessed the effect of the Proposed Development on the integrity of the setting of the Scheduled Monument, which is the key policy test. **EIA Chapter 7** notes that mitigation of these effects has been achieved through design of the Proposed Development, including reconfiguration of the turbine array to increase separation and rationalise its composition in views from Druim Dubh. These measures have ensured that change to setting arising from the Proposed Development has been appropriately considered within the design of the scheme and that effects have been minimised as far as reasonably possible.

5.8.11 The contribution to the understanding and appreciation of this asset through setting is chiefly in the influence of its hillock-top location in providing views across lower land to the north. **EIA Chapter 7** has identified that views to the east, west and south would be unchanged. The addition of turbines from the middle-far distance would alter views northward from Druim Dubh, giving rise to a significant effect. Furthermore, the Proposed Development when compared against the Consented Development, is located further away from the heritage asset and has been designed to locate turbines predominantly to the western sections of the Development Site.

5.8.12 However, it should be recognised that the setting of the Scheduled Monument is primarily restricted to the topographic situation of the asset and the general landscape context. This means that the important characteristic elements of the Druim Dubh are comprised of its more immediate surroundings and not the long distance views to the north. The integrity of the setting would therefore not be adversely affected by the Proposed Development as it would not compromise the asset's unique immediate surroundings.

5.8.13 Policy NBH 5 highlights the importance of the Callanish Sensitive Area. Although the Development Site is not within the Sensitive Area, **EIA Chapter 7** includes an extensive assessment of the potential impacts on the Calanais group of monuments, including to, from and between the monuments that make up the asset group. **EIA Chapter 7** identifies that turbines would not be visible in any views of the asset group from the south, east or north, and would appear only as very distant elements of the background beyond the hills to the east in views from the west. Turbines would be visible as very distant and peripheral elements of the background in views from Calanais I to Calanais II and Calanais III, and would not be visible in other views between assets in the group due to the orientation of these views away from the east. Where turbines would be visible in views of the assets, there would not be direct juxtaposition and the relative prominence of the much closer heritage assets would mean that views of turbines would remain secondary to those of the heritage assets. Views of the Proposed Development from the sea around Calanais would be very limited. **EIA Chapter 7** concludes that, while the Proposed Development would present a visual element on the horizon, it is not considered to detract from the integrity of the monuments' setting owing to distance and relative lack of prominence.

5.8.14 There are a number of "non-statutory" archaeological features within the Development Site and the Proposed Development has been designed to avoid all significant archaeological remains where possible. There is potential for as yet undetected buried archaeological remains to survive within the Development Site; however, site evaluation and assessments carried out as part of the EIA conclude that the extent of intrusive groundworks associated with the Proposed Development are unlikely to result in adverse effects on archaeological features. The Proposed Development would impact (though not significantly) upon a group of shieling huts, a head-dyke and the former Lewis Chemical Works. In line with the Development Plan policies, these effects can be mitigated through a written scheme of archaeological works, which can be secured through condition.

Historic Areas

5.8.15 The nearest Conservation Area to the Proposed Development is the Stornoway Conservation Area approximately 3.8km to the east of the nearest turbine. **EIA Chapter 7** demonstrates that, while turbines may be visible from the Conservation Area, their presence would be peripheral in a small number of key views from the harbour, and as such would not affect the principal contribution of the interrelationship of built elements of the Conservation Area. Effects on the understanding / appreciation of the Conservation Area via setting would therefore be negligible.

5.8.16 The Proposed Development would have no effects on the St Kilda World Heritage Site given its location.

Conclusion

5.8.17 No significant effects are predicted from the Proposed Development on any heritage assets other than the Scheduled Stone Circle at Druim Dubh and the Category B listed Lewis War Memorial.

5.8.18 In terms of the Lewis War Memorial, Policy NBH 4 seeks to protect the setting of listed buildings from developments that would result in a substantial adverse impact on their significance. However, development that would have a substantial adverse impact may be permitted where any lost significance which cannot be mitigated is outweighed by the social, economic, environmental or safety benefits of a development. Weighing the impact of the Proposed Development on the setting of the Lewis War Memorial against the wider public interest of the Proposed Development in terms of renewable energy generation, the Climate Emergency and local benefits (set out in **Chapter 3** of this revised Planning Statement), it is considered that the Proposed Development accords with Policy NBH 4.

5.8.19 In terms of the Druim Dubh stone circle, Policy NBH 5 states that development proposals that would adversely impact upon scheduled archaeological remains or the integrity of their settings would only be permitted in exceptional circumstances where there is no practical alternative site and where there are imperative reasons of overriding public interest. Taking into account the definition of setting and assessment of effect set out in **EIA Chapter 7** and summarised in **Section 5.8.9** above, it is considered that the Proposed Development would not adversely impact the integrity of the Druim Dubh Scheduled Monument's setting. There is therefore no need to consider the 'exceptional circumstances' requirements and the Proposed Development is considered to accord with Policy NBH 5 in this regard.

5.8.20 There is a potential for as yet undetected buried archaeological remains to survive within the Development Site. Any effects would be limited and could be effectively mitigated by the implementation of an agreed scheme of archaeological works that would allow for the identification and recording of any archaeological features or deposits of interest within the Development Site which would otherwise be affected by the Proposed Development. The Proposed Development is therefore considered to be in accordance with Policy NBH 5 in this regard.

5.8.21 The Proposed Development would not have a negative effect on the setting of the Stornoway Conservation Area and there is therefore no conflict with Policy NBH6.

5.9 Ecology and Ornithology

Policy Context

5.9.1 Relevant LDP policies are Policy NBH 2 on Natural Heritage, Policy NBH 3 on Trees and Woodland and Policy EI 3 on the Water Environment.

5.9.2 Policy NBH 2 takes a hierarchical approach to the natural environment, with the greatest protection being given to Natura sites. It sets out criteria that will need to be met where a development would affect a Natura site, a Site of Special Scientific Interest, a National Nature Reserve, a Marine Protected Area and protected species. The Policy only allows for development that would have an adverse effect on a European Protected Species where:

- There is no satisfactory alternative; and
- The development is required for preserving public health or public safety or for other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment; and
- The development will not be detrimental to the maintenance of the population of a European Protected Species at a favourable conservation status in its natural range.

5.9.3 The Policy also requires development proposals to avoid having a significant adverse effect on the ecological interests of a site, and where possible it should enhance the site's biodiversity and ecological interests.

5.9.4 Policy NBH 3 has a strong presumption against the removal of established trees and woodland of mixed native species which have a landscape and amenity value and/or contribute to nature conservation, unless removal would achieve significant additional economic, environmental or social benefits. Where loss is unavoidable, appropriate replacement planting will be required. This approach is consistent with the Forestry Commission's Control of Woodland Removal Policy 2009 which the LDP refers to where removal of woodland is proposed.

5.9.5 Policy EI 3 requires development proposals to avoid adverse impact on the water environment. The Policy also sets out requirements for development proposals adjacent to a watercourse and which contain or are adjacent to wetland or boggy areas, including the approach where a Groundwater Dependent Terrestrial Ecosystem (GWDTE) is identified.

5.9.6 The SPG advises that applicants should investigate the presence and importance of species and habitats in and around their proposed development site, including the potential need for mitigation, at pre-application stage for discussion with the Planning Authority. This includes assessing whether there may be impacts on qualifying species out with the boundary of designated sites.

5.9.7 The SPG identifies that electromagnetic fields have been shown to have the potential to affect the behaviour of migratory fish such as salmon, sea trout and European eels. In order to minimise this risk and avoid disturbance to water courses that may host migratory fish species, consideration should be given to locating turbine bases and power cabling away from water courses.

Assessment

Designated Sites

5.9.8 There are no designated sites within the Development Site. There are a number of designated sites within the vicinity of the Development Site and within the study area for Ornithology and Ecology **(AI Chapters 8** and **AI Chapter 9**):

- The Lewis Peatlands Special Protection Ares (SPA), adjacent to and extends along the western and northern boundaries of the Development Site (100m from the closest proposed turbine);
- The Lewis Peatlands Special Area of Conservation (SAC), located to the west of the Proposed Development (1.7km from the closest proposed turbine);
- The Lewis Peatlands Ramsar site adjacent to the Development Site, and less than 100m from the closest proposed turbine;
- Ness and Barvas SPA, approximately 13.5km north of the closest proposed infrastructure;
- Tong Saltings SSSI (3km east of the closest proposed infrastructure); and
- Achmore Bog SSSI (3.8km south west of the closest proposed infrastructure).

Lewis Peatlands SPA

5.9.9 **AI Chapter 8** (including the Habitats Regulations Appraisal in **AI Appendix 8H**) assesses the effects of the Proposed Development on the qualifying features of the SPA, specifically the following bird species:

- Black throated diver;
- Golden eagle;
- Greenshank;
- Red throated diver.

5.9.10 For black throated diver, previous surveys identified flight activity in the central and southern areas of the Development Site. **AI Chapter 8** identifies that the main potential effect on black throated diver would be displacement. However, given the low level of flight activity, there would be little potential for barrier effects to occur and it is considered that the risk of displacement would be low.

5.9.11 Golden eagle were recorded as occasionally flying across the Development Site as well as the surrounding area. However, the collision risks associated with the turbines would not lead to a reduction in the SPA population over the lifetime of the Proposed Development and there would therefore be no adverse significant effect on the Lewis Peatlands SPA's integrity.

5.9.12 Construction and decommissioning related disturbance/displacement effects to greenshank would minimised by the embedded measures outlined in Table 8.10 in **AI Chapter 8**. **AI Chapter 8** considers that availability of foraging and breeding habitat would not be a limiting factor due to the extent of available habitat within the SPA that would remain undisturbed during construction and decommissioning. In addition, the construction and decommissioning stages would be temporary. **AI Chapter 8** concludes that there would not be a significant effect on the SPA greenshank population and no adverse significant effect on the SPA site's integrity.

5.9.13 Red throated diver have been recorded within the Development Site as well as the surrounding area, with surveys identifying indications of nesting and flight activity. **AI Chapter 8** concludes that construction and decommissioning related disturbance/displacement effects would be temporary

and sporadic. In light of the embedded measures outlined in Table 8.10 of **AI Chapter 8** effects would be low. The Proposed Development has the potential to act as a barrier to red-throated divers undertaking foraging flights between breeding lochs within the SPA and coastal feeding areas. However, the scheme has been designed to ensure the turbines are widely spaced and corridors remain between them (see **EIA Figure 3.1** which identifies 2 flight corridors). As a result, any barrier effect would be small. The collision risks associated with the turbines would still allow the SPA population to increase over the lifetime of the wind farm and there would therefore be no adverse significant effect on the Lewis Peatlands SPA site's integrity.

Lewis Peatlands SAC

5.9.14 **AI Chapter 9** concludes that the Lewis Peatlands SAC is sufficiently distant from the Proposed Development that significant effects on all features other than otter (see below) are unlikely.

Lewis Peatlands Ramsar Site

5.9.15 The Lewis Peatlands Ramsar site is located adjacent to and extends along the western and northern boundaries of the Development Site (less than 100m from the closest proposed infrastructure). It is designated, in part, for its blanket bog - the area of qualifying blanket bog is coincident with that of Lewis Peatlands SAC (see **Section 5.9.23** above). The site supports a number of rare species of wetland birds including nationally important populations of red-throated diver, black-throated diver and greenshank.

5.9.16 **AI Chapter 8** considers the effects of the Proposed Development on these species. It concludes that the Proposed Development would not have any significant adverse effects on the integrity of the Ramsar site.

Tong Saltings SSSI

5.9.17 Tong Saltings SSSI is located approximately 3km to the east of the Development Site and is designated for its breeding bird assemblage, maritime cliff, mudflats, saltmarsh and sand dunes. The site contains one of the largest areas of saltmarsh and tidal flats in the Outer Hebrides. The site is also important for wintering, breeding and feeding birds, including terns, waders and wildfowl. The main potential source of adverse effects on the SSSI are potential effects on the hydrology of surface waters. These are addressed in **EIA Chapter 11**. **EIA Chapter 11** concludes that, although the Proposed Development is anticipated to cause temporary (short term) change to the local hydrology regime, this would have negligible effects on the interest features of the SSSI.

Achmore Bog SSSI

5.9.18 **EIA Chapter 11** considers that the Achmore Bog SSSI is at a sufficient distance from the Development Site such that there would not be connectivity with the Proposed Development.

Protected Species

5.9.19 Otter is a European protected species, an SBL Priority species and a designated feature of the Lewis Peatlands SAC. The Proposed Development footprint is outwith all areas specifically designated for otter populations; however, the Proposed Development is within the home range (generally acknowledged to be up to 32km) of otters from this designated site. Surveys indicate a relatively widespread distribution of otter activity along waterbodies within the Development Site, and on this basis, the Development Site is assessed as being of national importance for otters.

5.9.20 The location of the otter travel routes and resting sites were taken into account when designing the Proposed Development to avoid potential disturbance of these features wherever possible.

However, **AI Chapter 9** notes that two resting sites are located within a 50m construction buffer and are also within a standard distance threshold (30m) for disturbance to otters.

5.9.21 The effect of the Proposed Development on the otter population is assessed in **AI Chapter 9**. This assessment concludes that the effects on the otter population, including their habitat, during construction and operation is not significant due to the mitigation that would be adopted. The mitigation measures are outlined in Table 9.9 of **AI Chapter 9** and include the following:

- A Pollution Prevention Plan and Pollution Incident Response Plan;
- All watercourse crossings would be designed in accordance with good practice;
- Bridge construction would be undertaken by vehicles operating from the bankside rather than the watercourse;
- A construction area stand-off of at least 50m has been applied to all watercourses (except for watercourse crossings);
- The preparation of a Species Protection Plan for otter;
- The adoption of best practice in terms of managing and controlling activities to minimise the risk of pollution upon receptors and hydrological features.

Water Environment

Water Bodies

5.9.22 The Development Site is intersected by three river catchments, from north to south: River Laxdale (Abhainn Lacasdail), Glen River (Abhainn a' Ghlinn Mhoir) and the River Creed (Abhainn Ghrioda). The River Tope (Abhainn Leireabhaigh) is situated to the south of the Development Site. These are relatively small watercourses, crossing moorland/heath, with the River Creed being comparatively larger than the other watercourses. The watercourses are characterised by variable flow types, including riffle/run/glide sequences, and the water is generally less than 1m deep with variable substrates comprising mainly cobble, pebble and boulder. The watercourses connect a number of freshwater lochs on the Development Site.

5.9.23 A number of mitigation measures are proposed to safeguard the water environment, including a construction area stand-off of at least 50m. **AI Chapter 9** and **EIA Chapter 11** conclude that the effects on waterbodies would be limited to localised loss/disturbance of river habitats during installation of culverts and limited release of sediment at watercourse crossings. These would be localised, temporary and of short duration and would not alter the conservation status of waterbodies.

Aquatic Species

5.9.24 A number of important aquatic species have been recorded within the watercourses within the Development Site and nearby and have been considered in **AI Chapter 9**. **AI Chapter 9** identifies a number of mitigation measures for these aquatic species including:

- A pollution prevention plan;
- Use of best practice for the design of water crossings;
- Construction stand offs from watercourses;
- Constructing bridges from the bankside;

- Careful siting and design of culverts and the use of good practice of their construction;
- Avoiding key times of year for the construction of bridges and culverts;
- Locating turbine bases and power cabling away from water courses and/or directional drilling where crossing water courses are required.

5.9.25 **AI Chapter 9** concludes that the mitigation measures would reduce the risk of effects on Atlantic salmon, sea trout, brown trout and eel; sea lamreys; three-spined stickleback; freshwater pearl mussels and river habitats and associated invertebrate assemblages. The Proposed Development would not result in significant effects on aquatic species.

Ground Water Dependent Terrestrial Ecosystem

5.9.26 Water-dependent habitats are commonly regarded as groundwater-dependent terrestrial ecosystems (GWDTEs). A summary of NVC communities within the EIA study area that may indicate the presence of GWDTEs is provided within **EIA Appendix 9A** and potential effects on GWDTEs are addressed in detail in **EIA Chapter 11**. Potential effects on water conditions supporting fourteen GWDTEs and one combined designated conservation site within the Study Area and one designated conservation site downgradient of the Study Area are considered in **EIA Chapter 11**. **EIA Chapter 11** concludes that there would probably be significant effects on two GWDTEs as a result of the borrow pit search area near the northern site entrance. This is considered further in the borrow pit assessment in **Chapter 6** of this revised Planning Statement.

Trees

5.9.27 No broadleaf woodland is recorded within the Development Site. Some forestry plantation is present on the Development Site, but due to the low levels of nutrients in the peat soil and waterlogged nature of the peat, trees are generally in poor condition. Some woodland loss would occur as a result of the Proposed Development, the extent of which would be minimised as far as possible given its value to hen harrier. As explained in paragraph **5.9.40** below, it is not considered appropriate to replace the woodland within the Development Site as it is dominated by good quality blanket bog which has a far higher conservation importance than forestry plantation. However, the Outline Habitats Management Plan (**AI Appendix 9I**) does identify that there may be some potential for small-scale tree planting within the Development Site, particularly along drier ridges and mounds, and that, if it is determined that tree planting would be successful, the aims, objectives and prescriptions would be set out within a full Habitat Management Plan, which would be a planning condition of any consent.

Ornithology

5.9.28 **AI Chapter 8** assesses the likely effects on a range of bird species – black throated diver, common tern, hen harrier, red throated diver, white tailed eagle and whooper swan. Effects on other bird species were scoped out of the assessment as there would not be a likelihood of significant effects (see **AI Appendix 8E**).

5.9.29 The ornithological survey work has informed the design of the Proposed Development, resulting in design modifications including widely spaced turbines and corridors between them. Other mitigation is proposed that would minimise potential impacts on birds (Table 8.10 of **AI Chapter 8**), including:

- The development of a bird protection plan;
- Measure to protect nests and breeding birds;

- Inclusion of measures within the Habitat Management Plan (**AI Appendix 9I**) aimed at ensuring continued growth of the hen harrier population within and outside of the Development Site;
- Use of good practice when designing and constructing river crossings;
- The development of a pollution prevention plan.

5.9.30 Over the last four years, hen harrier have become established as a breeding bird species on the Isle of Lewis. Hen harrier activity has been recorded within the Development Site, and the survey results indicate that the coniferous forestry plantation present within the Development Site serves as preferential nesting and foraging habitat. As a result of the Proposed Development, it is anticipated that 40.61ha of coniferous plantation woodland (4.51ha as a result of direct loss from infrastructure, and 36.1ha as a result of keyhole felling) and 0.03ha of marshy grassland would be lost. It would not be appropriate to try to replace these habitats within the Development Site as it is dominated by good quality blanket bog, which has a far higher conservation importance than forestry plantation, modified bog and/ or rush pasture. However, approximately 5ha of amenity woodland would be planted with the site (See **Figure AI 9I 4.1** in **AI Appendix 9I**). The Applicant also proposes to identify an area of about 40ha of suitable habitat within the ownership of the Stornoway Trust where management for the benefit of hen harrier could be carried out. The Outline Habitat Management Plan (**AI Appendix 9I**) provides more detail on this.

5.9.31 **AI Chapter 8** concludes that the Proposed Development would not result in significant effects on bird interests as a result of displacement or collision-risk taking into account the inherent design, distance, and availability of suitable habitats. The Proposed Development, when considered in combination with existing and planned wind farms, is not considered likely to result in additional significant effects on ornithology.

5.9.32 When compared to the Consented Development (details in **Appendix 5**), the Proposed development would result in less collision risk each year for black-throated diver, golden eagle, red-throated diver and white tailed eagle. It is recognised that there would be an increase in predicted collisions for hen harrier from 0.123 to 0.243. This increase in impacts has occurred primarily due to an increase in recorded activity of hen harrier on the Development Site. Mitigation measures are set out in the OHMP (**AI Appendix I**) which will investigate methods of improving hen harrier habitat on-site, but away from turbine locations and on land outside the Development Site.

Conclusion

5.9.33 The Proposed Development would not have a significant effect on any Natura site, any SSSIs or National Nature Reserves or any protected species. The Outline Habitat Management Plan includes measures to enhance the biodiversity and ecological interests of the Development Site, including the planting of some native broadleaf trees within the Development Site, and the management of the remaining plantation forestry. The Proposed Development is therefore considered to accord with Policy NBH 2 and the requirements of the SPG.

5.9.34 The trees that would be lost as a result of the Proposed Development do not contribute to landscape, or provide visual amenity or screening for the Proposed Development. However some of the trees within the Development Site are being used by hen harriers, and therefore keyhole felling rather than clear felling has been promoted as part of the Proposed Development. This is to ensure the retention of the habitat for use by hen harriers. The Development Site is unsuitable for establishing tree plantations due to the widespread presence of good-quality blanket bog. However, opportunities could exist for localised tree establishment and the Applicant is willing to investigate the feasibility of undertaking tree planting in appropriate locations on the Development Site, as identified in the outline habitat management plan (**AI Figure 9I 4.1**), and to commit through the agreement of a Compensatory Planting plan to re-plant the lost woodland on suitable

adjacent land. The Proposed Development is therefore considered to accord with the requirements of Policy NBH 3 and would be consistent with the Forestry Commission's Control of Woodland Removal Policy 2009 referred to in the LDP.

5.10 Carbon Rich Soils

Policy Context

5.10.1 Policy EI 5 requires developments to minimise adverse impacts on soils. For some large scale renewable energy proposals, development will only be permitted where it has been demonstrated that unnecessary disturbance of carbon rich soils such as peat and any associated vegetation is avoided. The Policy also sets out the information required to support an application where peat and/or carbon rich soils may be affected.

5.10.2 The SPG also advises on the information required to demonstrate effects on soil resources including the use of the carbon calculator where there is evidence of peat or other carbon rich soils to demonstrate the net impacts or benefits of the Proposed Development.

Assessment

5.10.3 The dominant habitat within the Development Site is blanket bog, covering approximately 1,668ha. Wet heath covers approximately 32ha of the Development Site and is present where the blanket peat thins around knolls and hummocks.

5.10.4 In relation to the CnES Spatial Strategy outlined in **Section 5.4.3** above, the Development Site would be categorised as falling within group 2 by virtue of its location in an area containing carbon rich soils/deep peat. In line with the requirements of the SPG, a peat survey has been undertaken and the application is supported by a Peat Management Plan and Peat Slide Risk Assessment (**AI Appendix 9H**).

5.10.5 As set out in **AI Chapter 3**, site specific surveys have been carried out to inform the various design iterations. The layout of the Proposed Development (as described in **AI Chapter 4**) has avoided the deepest areas of peat and the most sensitive vegetation, and tracks would be floated on areas of peat deeper than 1m.

5.10.6 The Proposed Development would result in a direct loss of 28.68ha blanket bog. However, this would comprise 7.6ha of low sensitivity vegetation, a total of 27.21ha of medium sensitivity, with only 1.4ha of the highest sensitivity vegetation (the Proposed Development as submitted was 30.5ha). In addition to direct habitat loss, a precautionary (i.e. worst case) assumption has been made that indirect or temporary disturbance to blanket bog habitat, (that would be reinstated following construction), would occur as follows:

- 25m disturbance zone around all turbine bases and the borrow pits; and
- 10m hydrological disturbance zone around all other hard infrastructure comprising crane hardstandings, access tracks, substations, compounds, storage and laydown areas.

5.10.7 This temporary disturbance would affect 73.96ha in total, comprising 9.14ha of low sensitivity vegetation, a total of 66.2ha of medium sensitivity and only 3.86ha of the highest sensitivity vegetation.

5.10.8 The anticipated direct loss of wet heath habitats during construction of the Proposed Development is expected to be 2.4ha, with an additional area of 1.3ha anticipated to be temporarily disturbed during construction.

5.10.9 The assessment in **AI Chapter 9** concludes that the Proposed Development would result in significant adverse effects on blanket bog and wet heath. These effects would be minimised through the implementation of best practice measures (outlined in Table 9.9 of AI Chapter 9). Compensatory habitat management is proposed to address the significant adverse effects which cannot be mitigated – the permanent loss of 28.68ha of blanket bog and 2.4ha of wet heath.

5.10.10 The usual approach would be to undertake improvements to peat habitat onsite. Survey work was undertaken to try and identify suitable areas within the Development Site. Areas were identified where the removal of poor quality planted coniferous plantation woodland from the Development Site would potentially provide the required compensatory benefit for blanket bog restoration. However, this option was discounted due to the potential effects on hen harriers. The Outline Habitats Management Plan (**AI Appendix 9I**) provides more detail on this. The proposal is therefore to improve areas of peat offsite through specific peat management measures across at least 62ha (i.e. at least double the area of lost habitat), in consultation with SNH.

Conclusion

5.10.11 Peat is present within the Development Site, around 31ha would be removed and a further 77ha would be temporarily removed and reinstated following construction. **AI Chapter 3** and the peat survey in **AI Appendix 9H** demonstrate that the design of the Proposed Development has sought to minimise disturbance to peat, in particular the most sensitive areas, with only 1.4ha of such peat/vegetation being lost (further details on this is set out in the habitat loss calculations **AI Appendix 9G**). Onsite mitigation is not possible because of the ornithological interest but offsite mitigation would be undertaken in consultation with SNH across at least 62ha, with proposals including a range of management measures to improve the condition of the peat. The Outline Habitats Management Plan (**AI Appendix 9I**) provides more details on the proposed mitigation and management proposals. The Peat Management Plan (**AI Appendix 9H**) confirms best practice would be adopted for the movement, storage, management and reinstatement of soils.

5.10.12 It should be noted that the Consented Development also requires the removal of peat. The Proposed Development would result in the loss of approximately 37% less peat than the Consented Development due to the careful siting of turbines to avoid areas of deepest peat, and the change in foundation design from gravity foundation to rock anchor/cage foundation for many of the turbines. Further details on the comparison between the Consented Development and the Proposed Development is set out in **Appendix 4** of this revised Planning Statement.

5.10.13 The carbon calculator has been used to determine the net impacts/benefits of the Proposed Development and does not take account of the mitigation or compensation identified in the outline habitat management plan (**AI Appendix 9I**). As set out in paragraph **3.5.9** and **3.5.10** above, it is predicted that the carbon loss in developing the Proposed Development would be paid back in approximately 1.1 years. The Proposed Development would result in a potential annual CO_2 savings of 352,904 tonnes/year (based on figure of 430g of CO2 savings per kWh and a site specific capacity factor of 47.8%); could result in a total carbon saving of approximately 8.8M tonnes over its 25 year operational life and would generate electricity to annually supply the equivalent of 229,184 average homes in Scotland.

5.10.14 The Proposed Development is therefore considered on balance to accord with Policy EI 5 and the requirements of the SPG in terms of carbon rich soils as read as a whole.

5.11 Aviation

Policy Context

5.11.1 The relevant LDP policy is Policy EI 8 Energy and Resources as it requires renewable energy projects to demonstrate *"no significant adverse impact (including cumulative) on:…aviation…"*. The SPG supports Policy EI 8 by stating the following:

"The impacts of developments on aviation and defence operations must be satisfactorily addressed and developers must demonstrate that aviation, defence and emergency services operations will not be compromised. This includes flight activity, navigation and surveillance systems and other air safety navigation, test or surveillance assets or systems. Consultation with: Highlands & Islands Airports Limited; the Ministry of Defence; National Air Traffic Services; Maritime and Coastguard Agency and the Comhairle should take place at the relevant stages."

Assessment

National Air Traffic Services (NATS)

5.11.2 NATS En-Route Ltd has indicated that the Proposed Development would conflict with current safeguarding criteria. As a result they are objecting to the Proposed Development due risk to operation of 2 links between Sandwick and Eitshal. Further examination by their technical and operational safeguarding teams deemed the potential impact on air-ground communications to be acceptable. However, NATS is maintaining their objection to the Proposed Development due to the risk to operation of the two microwave links which is potentially obstructed by Turbine 8 of the Proposed Development. This turbine is located in the same place as the Consented Turbine T34. It is anticipated that the condition requirements relating to the Consented Development would also apply to the Proposed Development, and as a result this mitigation would address the concerns raised by NATS. Discussions are ongoing between the Applicant and NATS to establish the most appropriate mitigation solution.

MOD

5.11.3 A 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 (low flying) and Air Defence Radar (ADR) installations. A Line of Sight (LOS) assessment has been undertaken for the Proposed Development which has concluded that there is no detectability of the Proposed Development by the ADR in the region due to the distance between the receptors, curvature of the earth and intervening terrain. There would therefore be no effect on ADR installations as a result of the operation of the Proposed Development. The MOD has no objection to the Proposed Development and therefore ADR effects are scoped out.

5.11.4 However the MOD require lighting to be fitted in accordance with the Air Navigation Order (ANO) (2016) requirements. This means that aviation warning lighting would be required on all 35 turbines of the Proposed Development, assuming these would be in excess of 150m in height to blade tip. The CAA policy statement 'Lighting of Onshore Wind Turbine Generators in the United Kingdom with a maximum blade tip height at or in excess of 150m Above Ground Level', advises that that medium intensity (2000 candela), red, aviation warning lights are fitted as close as possible to the top of all fixed structures which have a total height of more than 150m above ground level. This mitigation has been included in the Proposed Development and an assessment of the effects is set out in **EIA Appendix 6D** and discussed in **Section 5.7.11** above.

Highlands and Islands Airport (HIAL)

5.11.5 Highlands and Islands Airport Limited (HIAL) had indicated that the Proposed Development falls inside of the safeguarded areas for Stornoway Airport and that the proposed wind turbines would present a significant infringement to the safeguarded area and associated communications systems. The CAA expects HIAL to provide evidence that the safety of Air Traffic Provision would not be compromised or degraded by the Proposed Development and a safety case / full assessment would need to be submitted to them.

5.11.6 A Safeguarding Assessment was undertaken for the Consented Development and this was agreed with HIAL and the CAA. HIAL have confirmed through their consultation response they do not object to the Proposed Development, subject to one light to be fitted on each turbine.

5.11.7 As set out above, **EIA Appendix 6D** assesses the Proposed Development based on the MOD requirements of the ANO. This would result in a greater visual effect than that required by HIAL. The Applicant would welcome a condition (should consent be granted) that requires the submission of an Aviation Lighting Plan which sets out the number, intensity, type and location of lighting.

Met Office Radar

5.11.8 In terms of the Met Office radar on the Isle of Lewis, , the Met office have responded to the EIA consultation, and have suggested a number of conditions that would make the Proposed Development acceptable. These conditions are similar in nature to those relating to the Consented Development and the Applicant would be welcome these conditions on the grant of any consent.

Predicted Effects: Cumulative

5.11.9 All potential effects in respect of telecommunications, infrastructure and utilities can be or have been mitigated therefore no cumulative effects would arise.

Conclusion

5.11.10 The Proposed Development would not have any significant impacts on infrastructure and telecommunications due to applying the mitigation outlined above. As such, there would be no significant residual effects on the identified infrastructure and telecommunications interests.

5.11.11 Discussions are ongoing between the Applicant and aviation interests to establish appropriate mitigation solutions in terms of the two NATS microwave links, and MOD and HIAL interests in terms of lighting. Mitigation controlled through condition would address all the issues raised in terms of aviation interests and as a result there are no significant negative effects upon aviation.

5.11.12 The Proposed Development therefore accords with Policy EI 8 and the SPG.

5.12 Water Environment

Policy Context

5.12.1 The relevant LDP policies are Policy EI 1 on Flooding, Policy EI 2 on Water and Waste Water and Policy EI 3 on the Water Environment. Policy EI 1 advises that development proposals should avoid areas susceptible to flooding and promote sustainable flood management. The Policy also sets out the requirements for Flood Risk Assessments. Policy EI 2 requires development proposals to incorporate SUDS to ensure water and waste water are managed in a sustainable manner. Policy EI 3 requires development proposals to avoid having an adverse impact on the water environment.

5.12.2 The SPG confirms that proposals for wind farms (and associated infrastructure) will be required to accord with LDP Policies EI 1 and EI 2 relating to water quality for ground water, surface water (including water supply), groundwater dependant terrestrial ecosystems and aquatic ecosystems and that it should be demonstrated that the proposal has been designed to minimise any detrimental impact.

Assessment

Flood Risk

5.12.3 In terms of flood risk to, and arising from the Proposed Development, the following sources of flooding have been considered within the **EIA Chapter 11**:

- Fluvial;
- Tidal;
- Groundwater;
- Artificial drainage systems; and
- Other sources such as overland flow and as a result of failure of artificial water bodies such as reservoirs and canals.

5.12.4 The majority of the Development Site is located outside the 1 in 100 and 1 in 200 year flood zones and no development infrastructure is located within either of these zones, other than certain access track watercourse crossings which could not be avoided. In addition, there is no tidal flood risk to the Development Site as minimum elevations on site exceed 50m AOD.

5.12.5 **EIA Chapter 11** considered the potential for flooding effects to arise in respect of two areas- Abhainn Lacasdail and Abhainn a' Ghlinn Mhòir – and two predominantly residential areas approximately 1km and 1.2km respectively downstream of the Development Site. However, **EIA Chapter 11** concludes that, given the limited extent of the proposed works compared to the area of the river catchments and the anticipated effectiveness of the mitigation measures, the Proposed Development would not result in increased flood risk in respect of any of these receptors.

Hydrology and Hydrogeology

5.12.6 The assessment of impacts on hydrology and hydrogeology are presented in **EIA Chapter 11**. The design of the Proposed Development incorporates a 50m buffer zone to the entire watercourse network, including springs, to protect water quality within and downstream of the Development Site (with the exception of watercourse crossings where appropriate mitigation is provided).

5.12.7 No significant constraints regarding risks to groundwater resources were identified. No licensed groundwater abstractions for drinking water or industrial activities have been recorded within the Development Site. There is a private water supply at Lews Castle, and a precautionary 250m buffer zone was placed around this abstraction point to protect the quality of the water. The groundwater abstraction identified by SEPA at Marybank Quarry has also been provided with a 250m buffer.

5.12.8 Given the location of the Development Site, various studies were undertaken in order to determine areas that would be constrained by significant amounts of peat, and which would therefore be unsuitable for development. Areas with steep slopes have been avoided for construction of turbines, as well as for other infrastructure and access tracks. The final design of the Proposed Development avoids areas of deeper peat as much as possible, with only three of the 35 turbines (Turbines 5, 13, 26) being located in areas of peat depth greater than 3m. Micro-siting during construction for those three turbines would aim to focus on areas of shallower peat.

5.12.9 Final drainage arrangements based on SUDS during the construction and operation phases can be controlled through planning conditions.

Conclusion

5.12.10 **EIA Chapter 11** demonstrates that the Proposed Development has been designed to minimise any detrimental impact on the water environment. It is not in an area that is susceptible to flooding, and it would not increase risk of flooding elsewhere. SUDS would be developed for both the construction and operational phases. The Proposed Development would not adversely impact upon the water environment and therefore accords with the requirements of Policies EI 1, EI 2 and EI 3 and the requirements of the SPG in this regard.

5.13 Traffic and Transport

Policy Context

5.13.1 The relevant LDP policies are Policy PD2 Car Parking and Roads Layout and Policy EI 9 Transport Infrastructure.

5.13.2 Policy PD2 contains requirements for new roads joining the existing road network and the creation of new roads, ensuring these elements of a development are safe and do not compromise the existing road network. Policy EI 9 highlights key priority areas for the upgrading and development of the transport infrastructure within, and serving the Outer Hebrides. This policy also establishes a set of criteria for new/improved traffic infrastructure or traffic management measures.

Assessment

5.13.3 The Proposed Development includes the provision of five onsite borrow pits. The assessment carried out in **AI Chapter 13** assesses Option 1 (no onsite borrow pits) and Option 2 (onsite borrow pits). The assessment in **AI Chapter 13** also identifies and assesses the route for abnormal loads (**EIA Appendix 13A**). All abnormal loads would be routed from Arnish Point Dock to the site using the A859.

5.13.4 Option 1 (no onsite borrow pits) calculates that 40,804 return journeys would be required during the construction phase. This would result in an increase in total vehicle movements on the local road network of 7.1%. Construction traffic associated with the Proposed Development for Option 1 (assessed in **AI Chapter 13**) would result in no significant effects in terms of severance, driver delay, pedestrian delay and amenity, fear and intimidation, and accidents and safety.

5.13.5 Option 2 (use of up to five onsite borrow pits) calculates that 5,876 return journeys would be required for the Proposed Development during the construction phase. This equates to an increase of 1.3% for all vehicle movements on local road networks. This is a substantial reduction in HGV journeys on local road networks when compared to Option 1. Further information on the borrow pits is set out in **Appendix 3** of this revised Planning Statement.

5.13.6 Once at the Development Site, the majority of construction HGV movement would be contained within the Development Site, making use of the purpose built on-site tracks. Where the on-site tracks would join the wider road network (access points), the criteria established in Policy PD 2 would be applied to ensure the bell-mouths created are safe and well designed.

5.13.7 **AI Chapter 13** concludes that construction traffic associated with the Development Site would result in no significant adverse effects in terms of severance, driver delay, pedestrian delay and amenity, fear and intimidation, and accidents and safety in terms of option 1, and this would further be reduced for option 2.

5.13.8 **AI Chapter 13** does identify that some improvements could potentially be carried out on the A859 and/or the infrastructure surrounding the Arnish Point Dock. It also identifies the need for a Construction Traffic Management Plan (CTMP) to be created for the Proposed Development, which would further ensure no significant effects from the construction of the Proposed Development would occur.

5.13.9 **AI Chapter 13** also considered the potential for significant cumulative effects with the potential construction of the following three Wind Farms, concluding that these are unlikely:

- Muaitheabhal Beinn Mhor;
- Muaitheabhal Beinn East Extension; and
- Muaitheabhal Beinn South Extension.

Conclusion

5.13.10 No significant effects are expected to result from the construction and operation of the Proposed Development. There are also no foreseen cumulative effects expected with regard to the construction and operation of the Proposed Development and the construction and operation of other wind farm developments in the area. The Proposed Development is therefore considered to be in accordance with Policies PD 2 and EI 9.

5.14 Development Plan Conclusions

5.14.1 The EIA demonstrates that the Proposed Development has been carefully considered, it has been subject to an iterative design process to minimise any effects (see **AI Chapters 3)** and where significant effects cannot be reduced to not significant, additional mitigation has been identified (see **AI Chapter 16**). The EIA has demonstrated that the Proposed Development can be satisfactory accommodated within the Development Site, and as a result the Proposed Development is considered to be in accordance with the key policy relating to renewable energy – Policy EI 8, and all other relevant policies set out in the Development Plan and the requirements of the SPG.

6. Benefits of the Proposed Development

6.1.1 The Proposed Development would give rise to a number of material benefits. These are summarised below.

6.1.2 The Proposed Development would contribute meaningfully to the attainment of the UK and Scottish Government policies, which require the deployment of further renewable energy developments, urgently and at scale, in order to facilitate the achievement of the targets for renewable electricity generation and renewable energy consumption. With an installed capacity of approximately 196MW), the Proposed Development would make a more significant contribution to the currently unmet targets for renewable electricity generation and renewable energy consumption as well as an important contribution to reducing greenhouse gas emissions. This would be in line with the Scottish Government Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 legally binding target of reaching a net-zero greenhouse gas emissions by 2045, which demand urgent action.

6.1.3 The electricity produced by the Proposed Development would be sufficient to provide electricity to power the equivalent of 229,184 households, in terms of their electricity consumption per annum.

6.1.4 The carbon calculator estimates that the Proposed Development would pay back the carbon emissions associated with its construction, operation and decommissioning in 1.1 years. There would be potential annual CO2 savings of 352,904 tonnes/year (based on figure of 430g of CO2 savings per kWh and a site specific capacity factor of 47.8%), the Proposed Development could result in a total carbon saving of approximately 8.8M tonnes over its 25 year operational life.

6.1.5 The Proposed Development would provide considerable economic benefits to the local and Scottish economy as a whole by providing £27.5m (12% of £229m) and £42.36m (12% of £353m) being spent locally and a range of between £82.44m (36% of £229m) and £127.08m (36% of £353m) spent within Scotland.

6.1.6 During the construction phase, the Proposed Development could directly support up to 307 Full Time Equivalent (FTE) local jobs (2 of which would be based on site), and up to 921 FTE jobs within Scotland for the duration of the construction phase (about 30 months). During its operational phase, employment related to operations and maintenance for the Proposed Development could directly support up to 208 FTE jobs, of which up to 87 FTE jobs could be local and up to 120 FTE jobs would be likely to be within Scotland. However, it is acknowledged that sufficient skilled workers may not be available on Lewis and it may be more likely that the jobs are created more regionally, than at a local level.

6.1.7 The Applicant is proposing a Community Benefit Fund which amounts to £5,000 (index-linked) per MW per annum.

6.1.8 The Proposed Development provides benefits not just linked to the economy or that have a monetary value. These benefits are the 28.7km of new access tracks and 14 watercourse crossings that would be available for the public and tourists to use.

6.1.9 The Applicant is committed to actively engaging with potential local suppliers and to placing as much work locally as possible.

6.1.10 The Applicant is proposing that there would be opportunities for shared ownership for the benefit of the local community. The Applicant is working closely with the Stornoway Trust, the local community landowner, and CnES, to develop arrangements to deliver up to 20% of the Proposed Development for community ownership.

6.1.11 At present further onshore wind development on the Isle of Lewis is constrained as the electricity network is at full capacity and a new interconnector to the mainland is required. Given the cost of the connection, the interconnector is more likely to be delivered if a solid 'needs case' is in place, which requires a critical mass of generation to connect within a certain time frame. Ofgem issued an update on the Final Needs Case for the Western Isles link in October 2019 stating that it could not be approved due to Stornoway Wind Farm not being granted a CFD but indicated a willingness to consider a revised needs case as soon as possible if one was submitted. The project continues to engage with Ofgem, SSE (SHE-T) and other stakeholders to support the Needs Case for the transmission link acknowledging the delivery a wind farm at the Development Site is key to meeting OFGEMS requirements.

7. Conclusions

7.1.1 This Revised Planning Statement has demonstrated that the Proposed Development sits firmly within the wider agenda of tackling Climate Change through increased support and targets for renewable energy generation.

7.1.2 The importance of renewable energy generation to alleviate climate change and security of supply risk is recognised at a UK and Scottish Government level and the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 strengthens the requirement to generate more energy from renewable resources. When introducing the net zero target, the Climate Change Secretary stated "*There is a global climate emergency. The evidence is irrefutable. The science is clear. And people have been clear: they expect action. The Intergovernmental Panel on Climate Change issued a stark warning last year: the world must act now. By 2030 it will be too late to limit warming to 1.5 degrees*." In support of introducing the net zero target, the First Minister stated that planning policy will undergo a fundamental review, with the need for planning policy to require more radically steps to reduce emissions.

7.1.3 **Table 7.1** below shows that there is a long way to go to achieving the targets that have been set and which are legally binding. The Proposed Development, with an installed capacity of approximately 196MW would make a substantial contribution to achieving these legally binding targets without significant additional adverse effects when compared with the Consented Development.

Table 7.1 Renewable Energy and Climate Change Targets

Target	Date	Set By	Current Position
Renewable Energy			
15% of final energy consumption (UK)	2020	Renewable Energy Directive 2009	11% in 2018 and 9% in 2016[12]
50% of total energy use from renewable sources	2030	Scottish Energy Strategy 2017	
Renewable Electricity			
Meet 100% of electricity demand from renewable sources (requiring approximately 16 GW installed capacity) in Scotland	2020	Routemap for Renewable Energy in Scotland 2011	76.2% at December 2019 (1.7 GW as of September 2019)[13]
Potentially 140% of electricity from renewable sources (requiring approximately 17 GW installed capacity)	2030	Scottish Energy Strategy 2017	
Climate Change			
Greenhouse gas emissions reduction target of at least 42% against 1990 levels	2020	Climate Change (Scotland) Act 2009	38% in 2015
Greenhouse gas emissions reduction target of 66% against 1990 levels	2032	Climate Change Plan 2018	

[12] www.gov.uk/government/statistics/uk-energy-in-brief-2019.
[13] https://www2.gov.scot/Resource/0054/00549213.pdf

Target	Date	Set By	Current Position
Greenhouse gas emissions reduction target of 80% against 1990 levels	2050	Climate Change (Scotland) Act 2009	
Greenhouse gas emissions reduction target of 56% against 1990 levels	2020	Climate Change (Emissions Reduction Targets) (Scotland) Act 2019	
Greenhouse gas emissions reduction target of 75% against 1990 levels	2030		
Greenhouse gas emissions reduction target of 90% against 1990 levels	2040		
Greenhouse gas emissions reduction target of 100% against 1990 levels	2050		

7.1.4 The Development Site has already been accepted as an appropriate location for a large scale wind farm development. The detailed design of the Proposed Development has sought to achieve a balance between maximising renewable electricity generation, including taking advantage of the significant advances in turbine size and power output, whilst reducing potential negative impacts. The Proposed Development provides a significant increase in output of 16MW and related benefits compared to the Consented Development, with only a small change in environmental effects. This would provide an additional contribution to meeting the legally binding net zero target set for the UK, without additional significant adverse effects.

7.1.5 In addition, there would be benefits in terms of a reduction in peat habitat loss of 37% or over 112,000m^3 and further improvements to peat habitat elsewhere in the local area. This reduction in peat disturbance would minimise effects on the carbon balance of the project, and would comply with the SPP in terms of reducing significant effects when compared to the Consented Development on an area of land identified in the SPP as Group 2.

7.1.6 There would be a reduction in predicted collisions per year for hen harrier. There would be a negligible increase in predicted collisions for black-throated diver, golden eagle, red-throated diver and white tailed eagle. This increase in impacts has occurred primarily due to an increase in recorded activity.

7.1.7 The Proposed Development is further from the main settlement of Stornoway, thus reducing impacts on the settlement, although it is recognised that the Proposed Development turbine heights are greater than that of the Consented Development, and as a result there would be no additional significant effects when comparing the Proposed Development to the Consented Development.

7.1.8 The Proposed Development has gone through a rigorous design process, and the reconfiguration of the turbine array to increase separation and rationalise its composition has reduced significant effects in views from Druim Dubh.

7.1.9 In overall terms, the small change in predicted environmental effects as a result of the Proposed Development in comparison to the Consented Development are considered to be clearly outweighed by its materially enhanced contribution to the wider public benefit in reducing greenhouse gas emissions, the positive and increased contribution to Scotland's renewable energy potential and the other benefits summarised in **Chapter 6** above.

7.1.10 The effects of the Proposed Development, both wider and localised, have, through the EIA process, been avoided, reduced or mitigated as far as possible. The Consented Development complied with SPP advice that wind farms should be developed in locations where the technology can operate

efficiently and environmental and cumulative impacts can be satisfactorily addressed. The Consented Development was found to be the right development in the right location. The same conclusion applies to the Proposed Development as it provides a more efficient, higher yielding and overall more sustainable development.

7.1.11 The Development Plan and associated SPG, in line with national planning policy sets out a Spatial Strategy and policy framework seeking to balance strategic energy requirements against the protection of environmental assets. A review of the Proposed Development's predicted impacts against the Development Plan policies and requirements of the SPG indicates that the Development Site is appropriate for renewable energy generation on the proposed scale, taking into account the local and wider benefits of the Proposed Development. It is also therefore compliant with the Spatial Strategy for wind farm developments.

7.1.12 The assessment of the Proposed Development against the Development Plan concluded that it accords with local planning policy overall. Furthermore, there are no material considerations that indicate that the Proposed Development should be refused.

7.1.13 As such, given the Development Site's history; the compliance with international, national and local renewable energy and planning policies, and the lack of any material consideration which would alter the position previously taken through the granting of the Consented Development, together with the fundamental change in renewable energy policy with respect to the net zero target, it is respectfully requested that section 36 consent and deemed planning permission be granted.

Appendix 1
Figures

Key

Development site boundary

0 km 1.5 km

Scale 1:25,000 @ A3

Client

Lewis Wind Power
Cumhachd Gaoithe

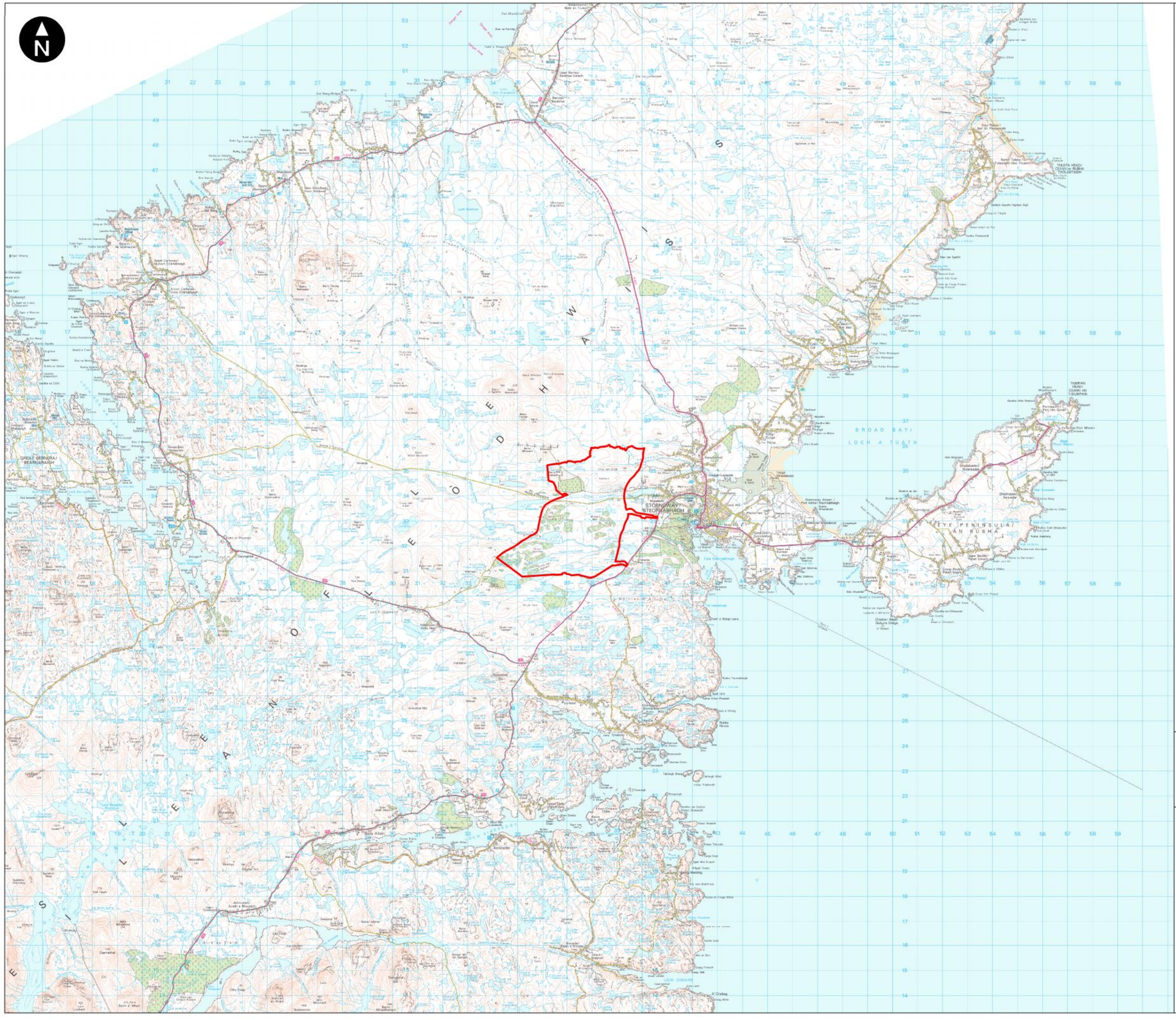
Stornoway Wind Farm
EIA Report

Figure 1.1
Development Site Boundary

March 2019

wood.

\\edi3-fs1.global.amec.com\shared\data\Projects\40001 SUB Stornoway Wind Farm\D040\MapInfo\40001 Gos428 Figure 1.1 Development Site Boundary.wor Tim Doggett



Client

Lewis Wind Power
Cumhachd Gaoithe

Stornoway Wind Farm
EIA Report

Figure 1.2
Development Site Context

March 2019

wood.

\\edi3-fs1.global.amec.com\shared\data\Projects\40001 SUB Stornoway Wind Farm\D040\Mapinfo\40001 Gos429 Figure 1.2 Site Context.wor Tim Doggett

Appendix 2
Comparative Wirelines – Consented and Proposed Development

Appendix 2
Comparative Wirelines – Consented and Proposed Development

1.1 Approach

1.1.1 Comparative Wirelines, comparing the Consented Development with the Proposed Development from ten different viewpoints have been provided in Figures 1-8 within this Appendix.

1.1.2 The viewpoints have been selected from the assessment viewpoints and which have been used for the design evolution of the Proposed Development within 15km of the Proposed Development as follows:

- Figure 1: Viewpoint 2: Lewis War Memorial;
- Figure 2: Viewpoint 4: Cnoc na Croich (Gallows Hill);
- Figure 3: Viewpoint 8: Stornoway – Ullapool Ferry Route A;
- Figure 4: Viewpoint 9: Tunga (Tong);
- Figure 5: Viewpoint 17: Standing Stones of Calanais;
- Figure 6: Viewpoint 24: Upper Newvalley;
- Figure 7: Viewpoint 25: Newmarket; and
- Figure 8: Viewpoint 26: Oliver's Brae.

1.1.3 Each of the figures illustrate a baseline photograph of the existing view and two wirelines. The central wireline shows the Proposed Development as it would appear from that viewpoint (proposed turbines shown in blue) with other cumulative wind farm development where visible (existing wind farms shown in 'black' and consented wind farms shown in 'green'). The bottom wireline, provides a comparison, showing the Consented Development (turbines shown in red) as it would appear from that viewpoint along with the same cumulative wind farm developments, as noted above.

1.1.4 Brief commentary on each of the Comparative Wirelines is provided is the section below.

1.2 Comparative Wireline Appraisal

Figure 1: Viewpoint 2: Lewis War Memorial

1.2.1 This viewpoint is located at the foot of Lewis War Memorial, an elevated local landmark with panoramic views, east of the Proposed Development. The nearest turbine is Turbine 34 at 3,035m distance. The primary view from the Memorial is over the core settlement of Stornoway, the coastline and The Minch as illustrated on **Figure 6.25b** of the LVIA. The view towards the Proposed Development, as illustrated in **Figure 1**, is orientated away from the coastline and core settlement and comprises undulating moorland broken up by Marybank Industrial Estate and residential properties at Marybank and Maryhill. The transmission masts at Loch Airigh na Lic are visible on the horizon with the summit of Beinn Mholach visible to the right of the view. The North Harris Mountains are visible to the left of the view in the far distance. Other man-made development

present in the view include scattered housing and industrial buildings, post and wire fencing, plantation forestry, scrub vegetation, and the existing wind farms at Beinn Ghrideag, Pentland Road and Arnish Moor.

1.2.2 The Proposed Development overlaps with part of the horizon already affected by existing wind farm development (and other vertical elements including masts) and affects a slightly smaller horizontal extent of view in comparison to the Consented Development. The Proposed Development presents a more even spread of turbines with less gaps and no outliers in comparison to the Consented Development. Although the proposed turbines are larger in height and rotor diameter, they are set further back beyond intervening landform and Greater Stornoway and present a similar scale in comparison to the Consented Development. The nearest consented turbine is 2,693m whilst the nearest proposed turbine is 3,035m. Due to the design composition (which utilises the existing Pentland Road and Beinn Ghideag wind farms as part of the composition), the openness and large-scale of the receiving landscape, and the panoramic views from this elevated viewpoint, the Proposed Development is therefore capable of being accommodated within the landscape.

1.2.3 There would be no change to the magnitude of change for the Proposed Development in comparison with the Consented Development, although there would be a slight increase in the level of effect due to an adjustment of the receptor sensitivity at this location rather than an increase in magnitude.

Figure 2: Viewpoint 4: Cnoc na Croich (Gallows Hill)

1.2.4 This viewpoint is located on Gallows Hill within the Lews Castle and Lady Lever Park Garden and Designed Landscape (GDL). The nearest turbine is Turbine 20 at 3,401m distance. From this location there are wide, open views over surrounding landscape with the settlement of Stornoway and coastline being the primary view to the east. The view towards the Proposed Development is orientated west / northwest and views across over vegetation and moorland towards the summit of Beinn Mholach. The view comprises mixed vegetation in the foreground associated with the GDL with large-scale open moorland beyond and is broken up by areas of plantation forestry and shelterbelts. Man-made development present in the view include post and wire fencing, telegraph poles, farm buildings, an industrial estate, transmission masts at Loch Airigh na Lic and existing wind farms at Creed, Beinn Ghrideag and Pentland Road.

1.2.5 The Proposed Development overlaps with the horizon already affected by existing wind farm development (and other vertical elements including masts) and affects a slightly smaller horizontal extent of view in comparison to the Consented Development. The Proposed Development presents a more even spread of turbines with less gaps and no outliers in comparison to the Consented Development. Although the proposed turbines are larger in height and rotor diameter, they are set further back beyond intervening landform and present a similar scale in comparison to the Consented Development. The nearest consented turbine is 3,140m whilst the nearest proposed turbine is 3,401m. Due to the wide panoramic views from this elevated location, large scale of the receiving landscape and the presence of other wind farms, the Proposed Development could be reasonably well accommodated in this view.

1.2.6 There would be no change to the magnitude and level of visual effect for the Proposed Development in comparison with the Consented Development.

Figure 3: Viewpoint 8: Stornoway – Ullapool Ferry Route A

1.2.7 This viewpoint is representative of views from the Ullapool to Stornoway ferry as it approaches Stornoway Harbour, east of the Proposed Development. The nearest turbine is Turbine 16 at 5,170m distance. The view is orientated west / northwest, viewing across the bay (Cala

Steornabhaigh) towards the settlement of Stornoway on one side and the rising landform of Cnoc na Croich (Gallows Hill) on the other side. Gallows Hill incorporates established woodland which is part of Lews Castle and Lady Lever Park GDL. Man-made development present in the view include the harbour and settlement of Stornoway, industrial buildings, woodland, and the existing wind farms of Beinn Ghrideag, Pentland Road, Creed and Arnish Moor.

1.2.8 The Proposed Development overlaps with the horizon already affected by existing wind farm development (and other vertical elements including masts) and affects a similar horizontal extent of view in comparison to the Consented Development. The Proposed Development presents a more even spread of turbines with less gaps and no outliers in comparison to the Consented Development. Although the proposed turbines are larger in height and rotor diameter, they are set further back beyond intervening landform which screens the majority of the turbine towers and restricts views largely to hubs and upper turbine towers in comparison to the Consented Development. The nearest consented turbine is 4,600m whilst the nearest proposed turbine is 5,170m.

1.2.9 There would be no change to the magnitude of change for the Proposed Development in comparison with the Consented Development, although there would be a slight increase in the level of effect due to an adjustment of the receptor sensitivity at this location rather than an increase in magnitude.

Figure 4: Viewpoint 9: Tunga (Tong)

1.2.10 This viewpoint is located southwest within the settlement of Tunga (Tong). The nearest turbine is Turbine 34 at 5,721m distance. The view is orientated southwest and views across dispersed residential properties in the foreground and open moorland towards the settlement of Stornoway. The landscape is predominantly moorland with some areas of rough grassland in the foreground with areas of plantation forestry and scattered trees. The settlement of Stornoway is visible in the middle distance, where the War Memorial extends above the horizon. The summit of Beinn Bharabhais is visible to the right of the view whilst the North Harris Mountains are visible in the far distance to the left of the view. Man-made development present in the view include post and wire fencing, telegraph poles, dispersed residential properties, industrial buildings, street lighting, vehicle movements associated with the B895, the War Memorial, transmission masts and existing wind farms at Arnish Moor, Creed, Beinn Ghrideag, Pentland Road and Bridge Cottages.

1.2.11 The Proposed Development overlaps with the horizon already affected by existing and consented wind farm development (and other vertical elements including masts) and affects a similar horizontal extent of view in comparison to the Consented Development. The Proposed Development presents a more compact and even spread of turbines with minimal gaps and overlapping, and no outliers in comparison to the Consented Development. Although the proposed turbines are larger in height and rotor diameter, they are set further back beyond intervening landform and present a similar scale in comparison to the Consented Development. The nearest consented turbine is 5,301m whilst the nearest proposed turbine is 5,721m. Due to the wide panoramic views from this location, large scale of the receiving landscape and the presence of other wind farms, the Proposed Development could be reasonably well accommodated in this view.

1.2.12 There would be no change to the magnitude and level of visual effect for the Proposed Development in comparison with the Consented Development.

Figure 5: Viewpoint 17: Standing Stones of Calanais

1.2.13 This viewpoint is located at the Standing Stones of Calanais, a popular visitor destination on the western coast of the Isle of Lewis. The nearest turbine is Turbine 1 at 13,282m distance. The view is orientated east and views across open moorland and rough grassland with dispersed residential

properties, towards the distant undulating skyline. The primary views from the Standing Stones are over the coastline to the south and west. A small part of Loch Ceann Hulabhaig is visible to the right of the view. Man-made development present in the view include post and wire fencing, telegraph poles, residential properties, and the existing wind farms at Pentland Road and Beinn Ghrideag.

1.2.14 The Proposed Development overlaps with part of the horizon already affected by existing wind farm development. Whilst there is slightly greater theoretical visibility of blade tips of the Proposed Development, considering the intervening distance and large-scale simple landscape, there would be no change to the magnitude and level of visual effect for the Proposed Development in comparison with the Consented Development.

Figure 6: Viewpoint 24: Upper Newvalley

1.2.15 This viewpoint is located opposite a bus stop within the settlement of Upper Newvalley, part of Greater Stornoway, east of the Proposed Development. The nearest turbine is Turbine 34 at 2,527m distance. The view is orientated west / southwest and views across houses located in the northwest part of the settlement. Land cover comprises rough grassland with some open moorland visible beyond the settlement edge. Man-made development present in the view include residential properties, post and wire fencing, telegraph poles, street lighting, local roads, garden vegetation and a transmission mast.

1.2.16 The Proposed Development affects a slightly smaller horizontal extent of view in comparison to the Consented Development and presents a more compact and even spread of 'visible' turbines with less gaps and overlapping, and no outliers in comparison to the Consented Development. Although the proposed turbines are larger in height and rotor diameter, they are set further back beyond intervening landform and present a similar scale in comparison to the Consented Development. The nearest consented turbine is 2,177m whilst the nearest proposed turbine is 2,527m.

1.2.17 There would be no change to the magnitude and level of visual effect for the Proposed Development in comparison with the Consented Development.

Figure 7: Viewpoint 25: Newmarket

1.2.18 This viewpoint is located on a minor road within the settlement of Newmarket, part of Greater Stornoway, east / northeast of the Proposed Development. The nearest turbine is Turbine 34 at 2,926m distance. The view towards the Proposed Development is orientated southwest, viewing across the western edge of the settlement and onto open moorland and some rough grassland. Parts of the settlement of Newvalley is visible in the middle distance. The North Harris Mountains are visible in the far distance. Man-made development present in the view include residential properties, telegraph poles, fencing, minor roads, transmission mast, planted vegetation, Lewis War Memorial, and existing wind farms at Beinn Ghrideag, Pentland Road, Creed and Arnish Moor.

1.2.19 The Proposed Development overlaps with the horizon already affected by existing and consented wind farm development (and other vertical elements including masts) and affects a slightly smaller horizontal extent of view in comparison to the Consented Development. The Proposed Development presents a more compact and even spread of turbines with less gaps and overlapping in comparison to the Consented Development. Although the proposed turbines are larger in height and rotor diameter, they are set further back beyond intervening landform and present a similar scale in comparison to the Consented Development. The nearest consented turbine is 2,533m whilst the nearest proposed turbine is 2,926m. Due to the wide views from this location, large scale of the receiving landscape and the presence of other wind farms (and other vertical elements), the Proposed Development could be reasonably well accommodated in this view.

1.2.20 There would be no change to the magnitude and level of visual effect for the Proposed Development in comparison with the Consented Development.

Figure 8: Viewpoint 26: Oliver's Brae

1.2.21 This viewpoint (not assessed as part of the Consented Development) is located on an elevated location along the A866 at Oliver's Brae, part of Greater Stornoway, east of the Proposed Development. The nearest turbine is Turbine 20 at 5,405m distance. The view is orientated west along the road, viewing over the settlement of Stornoway with the rising landform and mature trees of Lews Castle and Lady Lever Park GDL beyond. The summits of Beinn Bhearnach, Beinn Mholach and Beinn Bharabhais are visible in the distance to the right of the view. Man-made development present in the view include residential properties, street lighting, fencing, walling, roads, chimney stacks, signage, mature vegetation, Lewis War Memorial, and existing wind farms at Pentland Road, Beinn Ghrideag, Creed and Arnish Moor.

1.2.22 The Proposed Development overlaps with the horizon already affected by existing and consented wind farm development (and other vertical elements including masts) and affects a similar horizontal extent of view in comparison to the Consented Development. The Proposed Development presents a more even spread of turbines with less gaps and no outliers in comparison to the Consented Development. Although the proposed turbines are larger in height and rotor diameter, they are set further back beyond intervening landform and present a similar scale in comparison to the Consented Development. The nearest consented turbine is 5,146m whilst the nearest proposed turbine is 5,405m. Due to the large scale of the receiving landscape and the presence of other wind farms (and other vertical elements), the Proposed Development could be reasonably well accommodated in this view.

1.2.23 There would be no change to the magnitude and level of visual effect for the Proposed Development in comparison with the Consented Development.

Key

- Development site boundary
- Proposed Development wind turbine
- Proposed access tracks
- Proposed infrastructure (crane pads, comp
- Consented turbine location
- Consented access track
- Consented infrastructure

0 km 1.5 km

Scale 1:25,000 @ A3

Client

Lewis Wind Power
Cumhachd Gaoithe

Stornoway Wind Farm
EIA Report

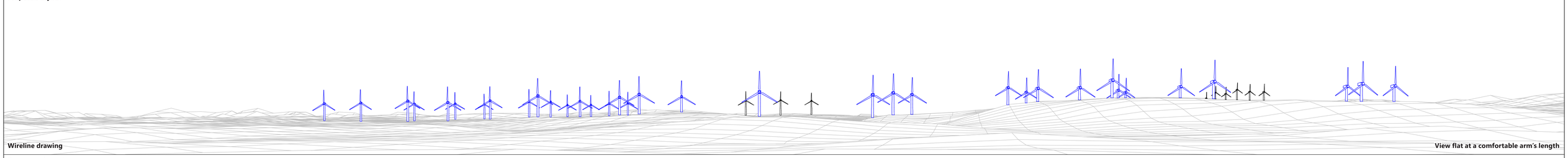
Figure 9.1
Consented Development vs Proposed Development

March 2019

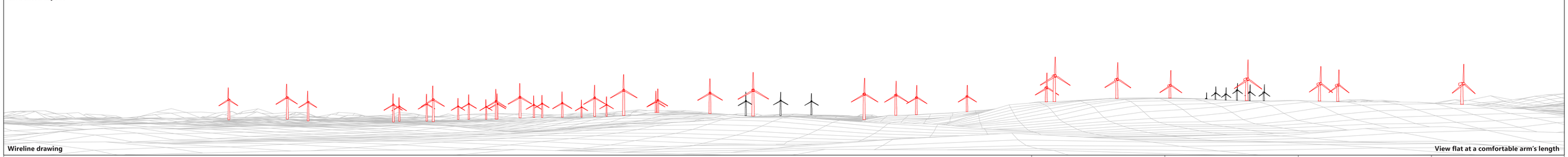
wood.

\\edi3-fs1.global.amec.com\shared\data\Projects\40001 Gos433a Figure 9.1 Consented vs Proposed Development.wor Tim Doggett

Proposed Layout



Consented Layout



Wind Farm Key: Stornoway Consented Wind Farm | Stornoway Proposed Wind Farm | Existing | Consented

OS reference:	E141 716, N934 331	Horizontal field of view:	90º (cylindrical projection)	Camera:	Canon EOS 5D Mk2
Eye level:	75.5m AOD	Principal distance:	522mm	Lens:	50mm (Canon EF 50mm f/1.8)
Direction of view:	262º	Paper size:	841mm x 297mm (half A1)	Camera height:	1.5m AGL
Nearest turbine:	3,035m	Correct printed image size:	820 x 130mm	Date and time:	29/10/2018 14:50

Client: Lewis Wind Power, Cumhachd Gaoithe

Stornoway Wind Farm
Planning Statement

Figure 1
Comparative Wireframes:
Viewpoint 2: Lewis War Memorial

March 2019

wood.

Originator: craig.wilson

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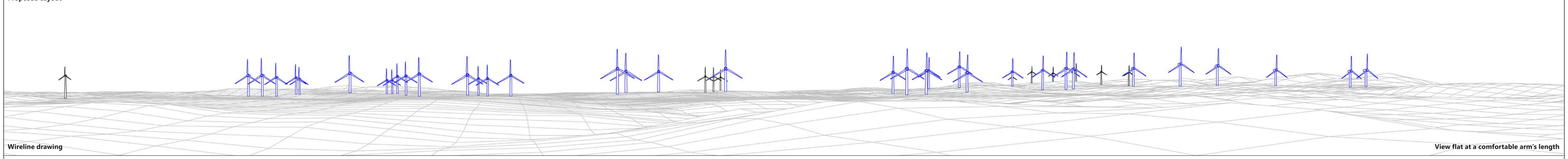
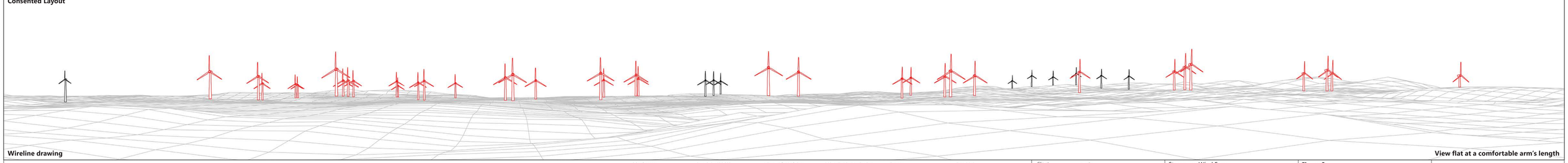
Proposed Layout



Consented Layout



Wind Farm Key: Stornoway Consented Wind Farm | Stornoway Proposed Wind Farm | Existing | Consented

OS reference:	E141 648 N932 337	Horizontal field of view:	90º (cylindrical projection)	Camera:	Nikon D810
Eye level:	63.5m AOD	Principal distance:	522mm	Lens:	50mm (Sigma 50mm 1:2.8 DG)
Direction of view:	288º	Paper size:	841mm x 297mm (half A1)	Camera height:	1.5m AGL
Nearest turbine:	3,401m	Correct printed image size:	820 x 130mm	Date and time:	11/11/2018 11:10

Client: Lewis Wind Power Cumhachd Gaoithe

Stornoway Wind Farm
Planning Statement

Figure 2
Comparative Wireframes:
Viewpoint 4: Cnoc na Croich (Gallows Hill)

March 2019

wood.

Originator: craig.wilson

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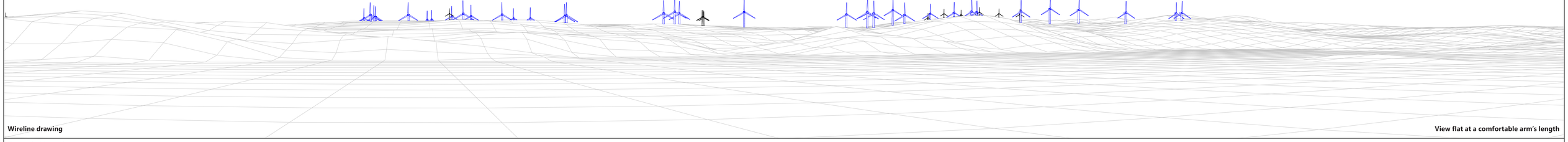
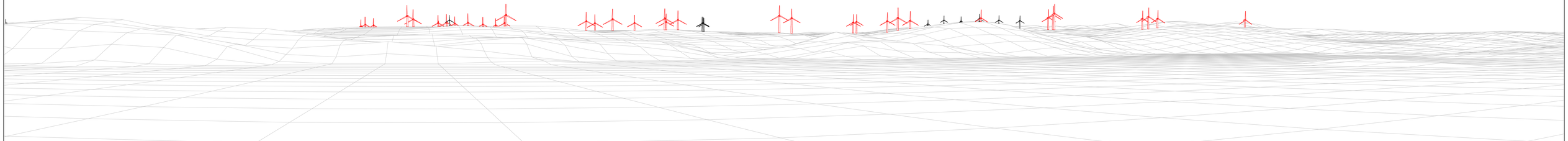
Proposed Layout



Wireline drawing

View flat at a comfortable arm's length

Consented Layout



Wireline drawing

View flat at a comfortable arm's length

Wind Farm Key: Stornoway Consented Wind Farm | Stornoway Proposed Wind Farm | Existing | Consented

OS reference:	E143 183, N931 380	Horizontal field of view:	90° (cylindrical projection)
Eye level:	19.5m AOD	Principal distance:	522mm
Direction of view:	291°	Paper size:	841mm x 297mm (half A1)
Nearest turbine:	5,170m	Correct printed image size:	820 x 260mm

Client: Lewis Wind Power Cumhachd Gaoithe

Stornoway Wind Farm
Planning Statement

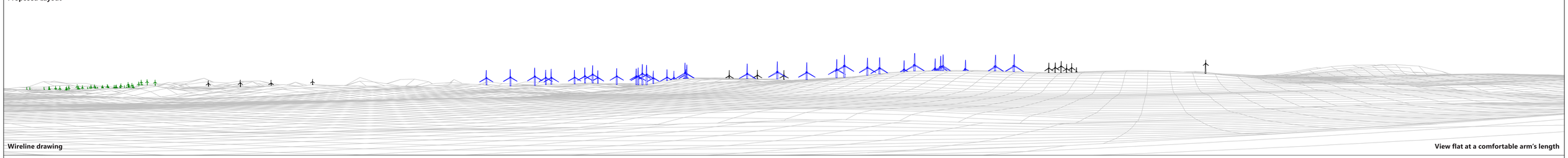
Figure 3
Comparative Wireframes:
Viewpoint 8: Stornoway - Ullapool Ferry Route A

March 2019

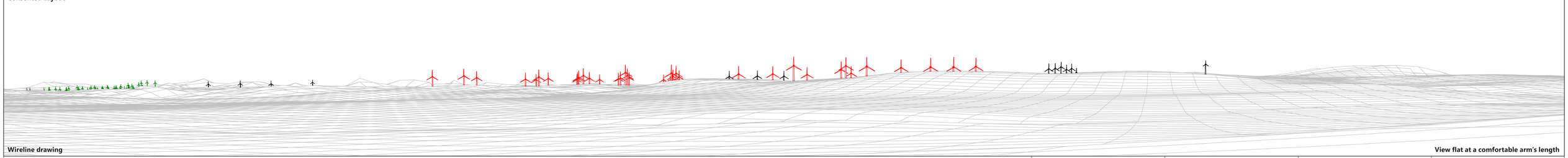
wood.

H:\Projects\43001 Stornoway Optimisation Feasibility Study\DO40\Drawings\43001-GDS832.indd Originator: craig.wilson

Proposed Layout



Consented Layout



Wind Farm Key: Stornoway Consented Wind Farm | Stornoway Proposed Wind Farm | Existing | Consented

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Direction of view:	255º	Paper size:	841mm x 297mm (half A1)	Camera height:	1.5m AGL
Nearest turbine:	5,721m	Correct printed image size:	820 x 130mm	Date and time:	02/11/2018 09:45

Client: Lewis Wind Power, Cumhachd Gaoithe

Stornoway Wind Farm
Planning Statement

Figure 4
Comparative Wireframes:
Viewpoint 9: Tunga (Tong)

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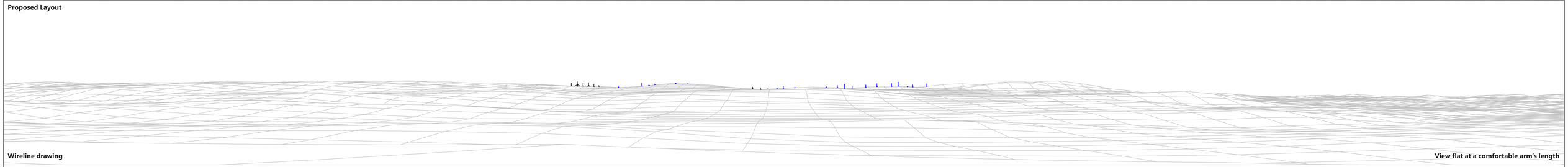
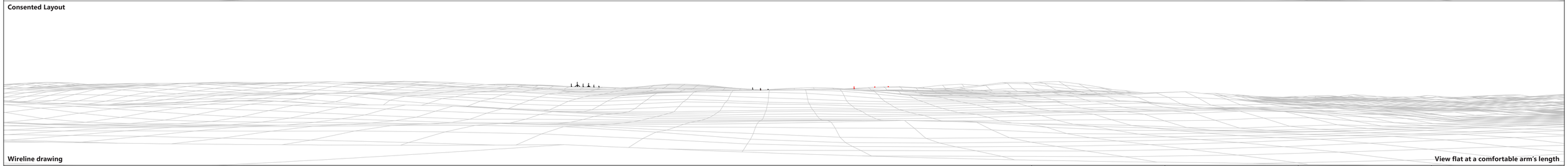
Proposed Layout



Consented Layout



Wind Farm Key: Stornoway Consented Wind Farm | Stornoway Proposed Wind Farm | Existing | Consented

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Direction of view:	95º	Paper size:	841mm x 297mm (half A1)	Camera height:	1.5m AGL
Nearest turbine:	13,282m	Correct printed image size:	820 x 130mm	Date and time:	25/11/2018 13:20

Client: Lewis Wind Power, Cumhachd Gaoithe

Stornoway Wind Farm
Planning Statement

Figure 5
Comparative Wireframes:
Viewpoint 17: Standing Stones of Calanais

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Originator: craig.wilson

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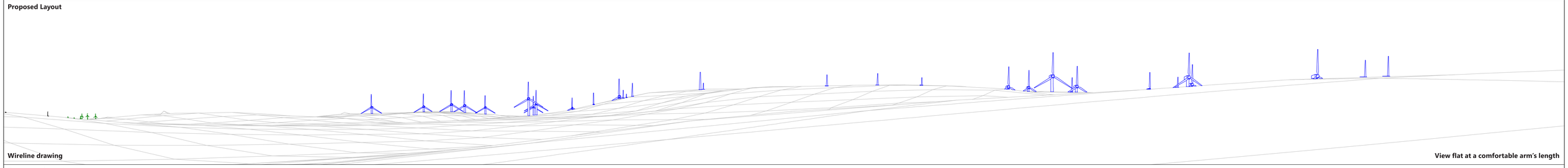
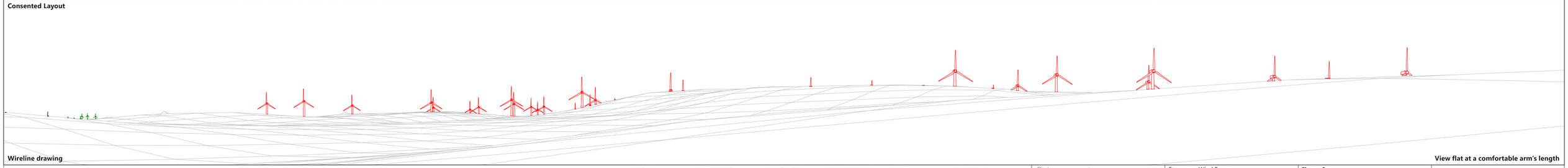
Proposed Layout



Consented Layout



Wind Farm Key: Stornoway Consented Wind Farm | Stornoway Proposed Wind Farm | Existing | Consented

OS reference:	E141 415, N935 136	Horizontal field of view:	90º (cylindrical projection)	Camera:	Canon EOS 5D Mk2
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Direction of view:	237º	Paper size:	841mm x 297mm (half A1)	Camera height:	1.5m AGL
Nearest turbine:	2,527m	Correct printed image size:	820 x 130mm	Date and time:	29/10/2018 14:20

Client: Lewis Wind Power, Cumhachd Gaoithe

Stornoway Wind Farm
Planning Statement

Figure 6
Comparative Wireframes:
Viewpoint 24: Upper Newvalley

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wood.

Originator: craigwilson

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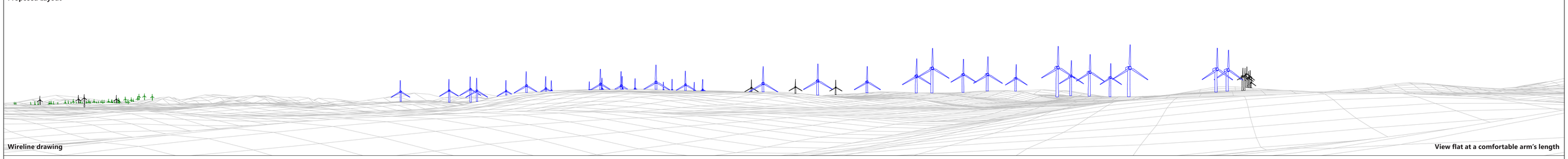
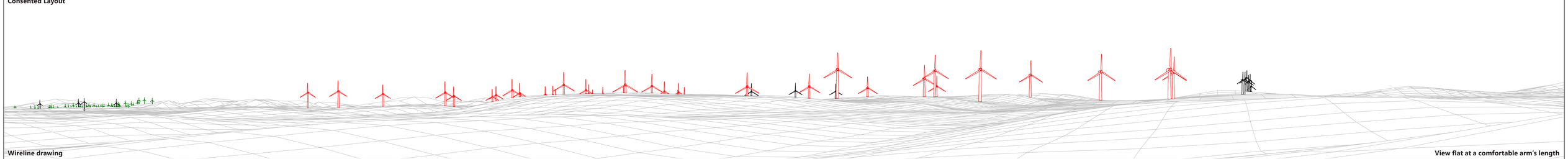
Proposed Layout



Consented Layout



Wind Farm Key: Stornoway Consented Wind Farm | Stornoway Proposed Wind Farm | Existing | Consented

OS reference:	E141 828, N935 786	Horizontal field of view:	90° (cylindrical projection)	Camera:	Canon EOS 5D Mk2
Eye level:	68.5m AOD	Principal distance:	522mm	Lens:	50mm (Canon EF 50mm f/1.8)
Direction of view:	257°	Paper size:	841mm x 297mm (half A1)	Camera height:	1.5m AGL
Nearest turbine:	2,926m	Correct printed image size:	820 x 130mm	Date and time:	29/10/2018 13:35

Client: Lewis Wind Power, Cumhachd Gaoithe

Stornoway Wind Farm
Planning Statement

Figure 7
Comparative Wireframes:
Viewpoint 25: Newmarket

March 2019

wood.

Originator: craig.wilson
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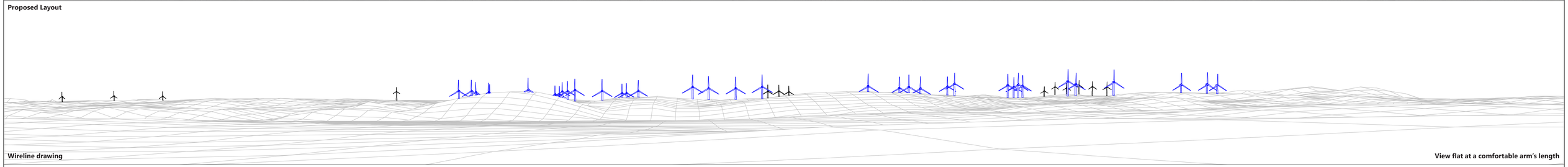
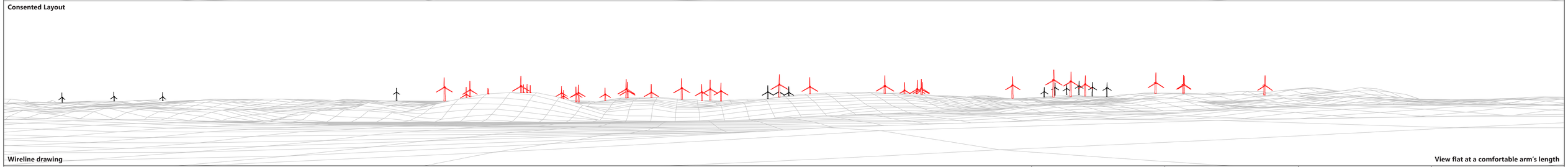
Proposed Layout



Wireline drawing

View flat at a comfortable arm's length

Consented Layout



Wireline drawing

View flat at a comfortable arm's length

Wind Farm Key: Stornoway Consented Wind Farm | Stornoway Proposed Wind Farm | Existing | Consented

OS reference:	E143 827, N932 675	Horizontal field of view:	90º (cylindrical projection)	Camera:	Canon EOS 5D Mk2
Eye level:	24.5m AOD	Principal distance:	522mm	Lens:	50mm (Canon EF 50mm f/1.8)
Direction of view:	278º	Paper size:	841mm x 297mm (half A1)	Camera height:	1.5m AGL
Nearest turbine:	5,405m	Correct printed image size:	820 x 130mm	Date and time:	29/10/2018 12:10

Client: Lewis Wind Power, Cumhachd Gaoithe

Stornoway Wind Farm
Planning Statement

Figure 8
Comparative Wireframes:
Viewpoint 26: Oliver's Brae

March 2019

wood.

Originator: craig.wilson

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Appendix 3
Borrow Pit Assessment

Appendix 3
Borrow Pit Assessment

1.1 Introduction

1.1.1 Five borrow pits are proposed as the source of aggregate for construction of wind farm tracks, turbine bases, crane hard-standings, the main construction compound and auxiliary compounds, the substation compounds, and site office. The location of the proposed borrow pits is indicated on **AI Figure 4.1** and further details on the borrow pits are illustrated in **AI Figure 4.12-16**.

1.1.2 Typically, aggregate extraction from borrow pits involves the following main activities:

- Installation of perimeter drains to prevent surface water flows entering the excavated area;
- Creation of sumps and silt traps to capture subsurface flows and rainwater from the excavated area prior to discharge into the perimeter drains. These would allow suspended materials in the water to drop out before entering the drainage system;
- Upper layer of heather or grass (top 300mm minimum) would be turfed, rolled and located suitably near to the point of removal. Turves would be watered and maintained until reinstatement (should that be required);
- Extracted material would be separated and machined/crushed within the borrow pit (or adjacent to it) and separated into stockpiles for use as general fill, structural fill or topping material.

1.1.3 Extraction of the material would involve blasting of rock, the methodology for this would be contained in a Quarry Management Plan if required.

1.1.4 **Table 1.1** below provides further information about the proposed borrow pits and **AI Figure 4.12-16** provides indicative layouts for the borrow pits.

Table 1.1 Borrow Pit Volumes

Borrow Pit	Approx. Length (m)	Approx. Breadth (m)	Area (m^2)	Estimated Area Excavated (m^2)	Depth BP Floor (m)	Recovery %[1]	Volume (m^3)
A	260	150	36,250	9,000	12.5	80	90,000
B	100	100	10,000	3,000	12.5	80	30,000
C	205	90	19,340	6,000	12.5	80	60,000
D	200	120	23,900	7,000	12.5	80	70,000
E	175	85	14,660	6,000	10.5	80	50,000

[1] Recovery is the amount of rock taken from the ground minus waste rock, eg if 100m^3 of rock is taken out of the ground, 80m^3 would be recovered, and 20m^3 would be waste rock.

Alternative Lewis Quarries

1.1.5 It is anticipated that a limited amount of stone would need to be imported from existing on-island quarries for initial site set up works and to construct the section of track up to the first of the borrow pits. It is expected that the rock required would be sourced from one or more of the local established sources identified below:

- Marybank – Bardon Hebrides
  - Location: 2km west of the centre of Stornoway on A589 near turning to the fabrication yard at Arnish Point.
- Creed Business Park – IA & C Maciver
  - Location: 3km south west of the centre of Stornoway on A589 at turning to the Creed Enterprise Park.
- Bennadrove – Bardon Hebrides
  - Location: 3km west of the centre of Stornoway.
- Loch Airigh na Lic – Bardon Hebrides
  - Location: next to Bennadrove, 3km west of the centre of Stornoway.

1.2 Policy Context

1.2.1 The main policy consideration relating to borrow pits is contained with the SPP and LDP Policy ED5 Minerals.

1.2.2 Paragraph 243 of the SPP states:

"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."

1.2.3 Policy ED5 Minerals of the LDP states:

"Proposals for borrow pits will be supported to allow the extraction of minerals near to or on the site of associated development (e.g. wind farm development or infrastructure projects) provided it can be demonstrated that there are significant benefits compared to obtaining the materials from local quarries and that criteria a) to i) above are met. These consents will be time-limited, tied to the proposal and must be accompanied by full restoration proposals and aftercare."

1.2.4 Criteria a – i include impacts on residential amenity, air quality, the water environment and land, the road network, the natural and historic environment; cumulative effects and securing restoration and aftercare.

1.2.5 The Wind Energy Development SPG also needs to be considered as it expresses the Council's commitment to Paragraph 243 of the SPP and LDP Policy ED5, and establishes the further requirements of:

"Additionally, a map of all proposed borrow pits must be submitted along with a site specific plan of each borrow pit detailing the:

- *Location, size, depths and dimensions of each borrow pit;*
- *Existing water table and volumes of all dewatering;*

- *Proposed drainage and settlement traps, turf and overburden removal and storage areas;*
- *Restoration profile, nature and volume of infill materials, and, if wetland features form part of the restoration, 25 year management proposals."*

1.3 Consideration of Potential Effects

1.3.1 The EIA Report considers the potential effects that could result from the construction and operation of the five proposed borrow pits.

Traffic and Transport

1.3.2 AI Chapter 13 considers the amount of traffic generated by the use of off-site aggregate sources (Option 1) and the use of on-site borrow pits (Option 2). Option 1 would result in a total of 45,630 return journeys. Option 2 would only require 5,792 return journeys by not requiring aggregate/stone trips to take place on the public road network. The use of borrow pits would therefore significantly reduce the amount of return journeys required on the public highway and consequently gives rise to significant benefits in the context of reduced impacts on traffic and transport receptors

Landscape and Visual

1.3.3 The effects of the proposed borrow pits were considered within the landscape and visual impact assessment in **EIA Chapter 6**. The assessment concluded that the development and operation of the borrow pits would contribute to a significant (temporary) but localised effect on the landscape character of the Development Site (within approximately 100-250m). In terms of visual effects, the assessment concludes that there would be very limited visibility of the borrow pit to the north of the A858 from public areas. Visibility from public areas of the other four borrow pits would be limited from small parts of the A858 and A859, elevated vantage points and a small number of properties along the A859. These effects would be temporary however as the borrow pits would only be operational during the 30 month construction period (allowing for up to 12months for final restoration of the borrow pits) with restoration taking place once each borrow pit was worked out (ie progress restoration of the borrow pits).

1.3.4 A detailed restoration plan would be developed, drawing upon the advice of a landscape architect and an ecologist and implemented in agreement with CnES, SNH and SEPA, to ensure that the restoration materials and techniques are suitable and that the restored sites blend into the surrounding topography. It is anticipated that steep faces would be graded out to fit with the surrounding topography and disturbed surfaces resurfaced with peat previously excavated from the areas. More detail is provided in **AI Figures 4.12a-e**.

Ecology

1.3.5 **AI Chapter 9** considers that there would be some negative effects on ecology due to a direct loss of habitats (especially blanket bog where the effects would be significant in EIA terms) and an indirect effect on surrounding habitats due to the disturbances created during the borrow pits' construction. **AI Chapter 9** proposes that a precautionary 25m disturbance zone should be created around the borrow pits in order to reduce their potential indirect effects on surrounding habitats. It also highlights that habitat re-instatement would take place within and around the borrow pit after construction in order to mitigate some of the habitat lost.

1.3.6 The Consented Development has authorisation to develop seven borrow pits within the Development Site, whereas the Proposed Development would only require five borrow pits. This

reduction in the number of borrow pits would reduce peat excavation from 124,126m^3 to 58,809m^3. This is a substantial reduction (53%) in the loss or disturbance of peat, and which is considered to be a significant environmental benefit of the Proposed Development when compared to the Consented Development.

Geology, Hydrology and Hydrogeology

1.3.7 With regard to Geology, Hydrology and Hydrogeology the only potentially significant effects are predicted with respect to two low value groundwater-dependent habitats on Cnoc Loch a' Leadharain. The effects are principally due to the proposed excavation of a borrow pit A (the one located near to northern access) across the two habitats and their catchments. **AI Chapter 11** does not advocate micro-siting for this borrow pit because, when considering the effects of habitats rather than the water conditions supporting these habitats, the overriding ecology assessment is focussed instead on the wider-scale wet heath and blanket bog habitat and the adoption of a Habitat Management Plan. However, an agreed water quality 'monitoring and respond' programme is recommended.

1.3.8 On this basis, with both embedded and additional mitigation in place, standalone and cumulative effects of the proposed borrow pits on all water receptors are considered acceptable.

Residential Amenity

1.3.9 The potential for the blasting of the borrow pits would not be known until the detailed design phase. However, given that the distance to the nearest occupied property would be more than 1km, it is considered that any blasting can be sufficiently managed by good practice to avoid significant effects. A Blasting Management Plan would be designed to incorporate good practice and to minimise noise and vibration effects such that they would be not significant.

1.3.10 The main air quality issue that is associated with borrow pits is the generation of dust. This is because the method of extraction can sometimes involve large-scale excavation, handling and transport of potentially dry materials, which are susceptible to dust generation. Receptors can potentially be affected by dust up to 1km from the source, although any dust emissions are more likely to be deposited much closer to the dust sources, generally within 500m. A number of measures to minimise the generation of fugitive dust at the borrow pit faces would take place. This would include any drilling rigs being fitted with effective dust suppression equipment which is considered good practice. In addition, and prior to drilling and blasting taking place, the area to be blasted would be dampened down if necessary. Furthermore, given the distances of residential properties from the borrow pits and the fact that such operations would be taking place within the Development Site, the likelihood of fugitive dust leaving the Development Site perimeter would be low.

1.3.11 **EIA Chapter 12** also concludes that the construction traffic from off-site aggregate sources (Option 1) or the on-site borrow pits (Option 2) would both have no significant effects on receptors due to noise.

1.3.12 It is therefore considered that there would be no significant adverse effects from the creation of the proposed borrow pits on nearby residents as any effects can be mitigated and conditioned appropriately.

Other Environmental Impacts

1.3.13 **EIA Chapter 7** identified significant effects on only two heritage assets - the listed Stornoway War Memorial and the Druim Dubh Scheduled stone circle. These significant effects are because of the nature of the turbines - that is tall structures. Given the nature of the borrow pits and their distance

from these heritage assets, there would not be any adverse effects. **EIA Chapter 7** acknowledges that there is potential for as yet undetected buried archaeological remains to survive within the Development Site and this may include the locations for the proposed borrow pits. In line with the Development Plan policies, these effects can be mitigated through a written scheme of archaeological works, which can be secured through condition.

1.4 Restoration and Aftercare

1.4.1 The borrow pits would be restored following construction of the wind farm. The restoration would be progressive, once each borrow pit was worked out. An additional 12 months has been allowed for the final restoration works which takes into account the completion of borrow pit working, and the time of the year this would be. This allows for the movement of material during the most appropriate weather conditions. Once rock extraction has been completed, overburden (if any) from the borrow pits would be replaced in order to create a new land profile that would provide exposed crags for the upper benches, and overburden and pear profile restoration around the lower bench and quarry floor. This peat profile on the quarry floor would be gently undulating to tie in with the contours of the land on either side of each of the borrow pits. The restoration works would be time limited, and linked to the construction works for the Proposed Development. This is in line with Scottish Planning Policy. Should consent be granted, this restoration requirement would be secured by a condition on the deemed planning permission.

1.5 Conclusions

1.5.1 This Appendix has been produced for the purpose of providing an overview of the borrow pits, their potential environmental effects, and a planning assessment of the proposed borrow pits on land located with the Development Site associated with the construction of the Proposed Development as required by paragraph 243 of the SPP and Policy ED5.

1.5.2 This Borrow Pit Assessment draws on the environmental conclusions set out in the EIA. The EIA identifies that the proposed borrow pits would result in some significant and other adverse effects in terms of ground water dependant terrestrial ecosystems around Borrow Pit A, some adverse visual effects, together with adverse effects in terms of the temporary disturbance to peat.

1.5.3 The use of on-site borrow pits would result in local benefits in terms of reducing the number of HGVs on the rural road network (i.e. from 45,630 return journeys down to 5,792return journeys), reducing fuel and noise emissions from HGVs and sourcing stone in very close proximity to its use. The reduction in the number of borrow pits on site from seven to five, would also reduce the amount of peat lost or disturbed when compared to the Consented Development (a 53% reduction in peat. Further information on this is set out in **Appendix 4**). The identified adverse impacts from the proposed borrow pits are all considered to be small in nature and would not therefore result in any unacceptable impacts.

1.5.4 This Assessment concludes that the borrow pits are required as ancillary development to the primary development being applied for, they would be for a limited period of time (less than 30 months) and demonstrates a clear need for their use associated with the construction of the wind farm as required by paragraph 243 of the SPP. The assessment also concludes that where adverse impacts are identified, they can be mitigated by the measures identified in AI Chapter 16 of the EIA and controlled by planning conditions and good practice. It is therefore considered that the proposed borrow pits accord with both Development Plan policy ED5 and the SPG.

Appendix 4
Vegetation (peat) Comparison

Appendix 4 - Comparison of the Volumes of Peat Disturbed for the Consented Development and the Proposed Development

In total, it is estimated that 193,878m^3 of peat, or peaty soils, would need to be excavated for the Proposed Development. Of this total, 107,024m^3 of acrotelmic peat would be excavated, and 86,854m^3 of catotelmic peat would be extracted.

It is estimated that 306,321m^3 of peat or peaty soils would be excavated for the Consented Development. Of this total, 157,558m^3 of acrotelmic peat would be excavated, and 148,765m^3 of catotelmic peat would be extracted.

Table 3.2 of the PMP (**AI Appendix 9H**) sets out the comparison of peat volumes between the Consented Development and the Proposed Development. Extracts of this table is set out below in **Appendix Table 4.1**.

In summary, there would be a reduction of 112,443m^3 of peat affected by the Proposed Development when compared to the Consented Development. This represents a reduction of 37% in the volume of peat proposed to be excavated for the Consented Development.

Appendix Table 4.1 Total Volumes of Peaty (Carbon Rich) Soils and Peat Stripped during Construction

Infrastructure	Estimated Acrotelmic[14] Peat Volume to be Excavated (m^3) for the Proposed Development	Estimated Catotelmic[15] Peat Volume to be Excavated (m^3) for the Proposed Development	Estimated Peat Volume to be Excavated (m^3) for the Proposed Development	Estimated Peat Volume to be Excavated (m^3) for the Consented Development	% Change Compared to Consented Development*
Turbine Foundations	3,246	6,497	**9,743**	**33,706**	-71%
Crane Hard Standings	22,012	44,474	**66,486**	**41,033**	+62%
Substation	6,000	9,600	**15,600**	**22,070**	+14% (substations and construction compounds combined)
Temporary Construction Compound	6,000	3,600	**9,600**		
Borrow Pits (A, B, C, D & E)	45,637	13,172	**58,809**	**124,126**	-53%
Access Tracks (11,700m) plus passing places (24)	24,129	9,511	**33,640**	**85,386**	-61%
TOTALS	**107,024**	**86,854**	**193,878**	**306,321**	-37%

* Key differences in peat volumes:

[14] Acrotelmic peat is the upper part of the peat profile which supports living plant material. Whilst organic matter decomposes aerobically and, therefore, quite rapidly the acrotelm has physical structure and can usually be cut as peat turves. For the purposes of this PMP the acrotelm is assumed to be the top 0.5m of the peat profile and is referred to as "peat turves".

[15] Catotelmic peat is the lower part of the peat profile where organic matter decomposes anaerobically and the catotelm has little, or no, physical structure. For the purposes of this PMP the catotelm is assumed to be any part of the peat profile which lies more than 0.5m below the surface and is referred to as "loose peat".

1. Turbine foundations reduction due to use of rock anchors;
2. Crane hard standings increased dimensions due to increased size of turbines;
3. Substation and temporary construction compound increase due to inclusion of substation within search area for Borrow Pit A in consented scheme layout;
4. Borrow pits reduction due to targeting shallower peat depths; and
5. Access tracks reduction due to increased use of existing tracks and floating roads.

Appendix 5
Ornithological Comparison

Comparison of the Consented Development and the Proposed Development Ornithological Impacts

A comparison of ornithological impacts for the consented 36 turbine Stornoway Wind Farm and the current proposal based on the survey data collected between October 2017 to September 2019 is summarised in Table 8.22 of **AI Chapter 8**. This table is repeated below in **Appendix Table 5.1**.

In summary, there would be a reduction in predicted collisions per year for hen harrier.

There would be an increase in predicted collisions for black-throated diver, golden eagle, red-throated diver and white tailed eagle. This increase in impacts has occurred primarily due to an increase in recorded activity. The increase in the impact is considered to be negligible.

Appendix Table 5.1 Comparison of Impacts

	Number of breeding territories within ZoI		Number of roosting birds within ZoI		Predicted Collisions per year	
	Proposed Development	**Consented Development**	**Proposed Development**	**Consented Development**	**Proposed Development**	**Consented Development**
Black-throated diver	1	1	-	-	0.059	0.055
Golden eagle: breeding	0	0	0	0	0.235	0.179
Golden eagle: non-breeding	-	-	0	0	0.073	0.058
Hen harrier: breeding*	5	6	-	-	0.123	0.243
Hen harrier: non-breeding	-	-	6	6	0.022	0.082
Red-throated diver: breeding*	2	3	-	-	0.444	0.334
White-tailed eagle: breeding	0	0	0	0	0.391	0.289
White-tailed eagle: non-breeding	0	0	0	0	0.243	0.187

* 2019 nest locations