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SUMMARY OF KEY POINTS RELATED TO THE PLANNING SUBMISSION

1 INTRODUCTION

- 1 Lewis Wind Power Limited (LWP), a company owned by AMEC and British Energy, is proposing a major commercial wind farm on the Isle of Lewis, in the Western Isles located off the north west coast of Scotland. The wind farm, comprising 234 wind turbines and associated infrastructure, would have a maximum generating capacity of 702 MW.
- 2 The decision to grant planning consent for the wind farm lies with the Scottish Ministers, who will be advised by officials within the Scottish Executive. In considering LWP's proposal, the Scottish Executive will consult with the local authority, Comhairle nan Eilean Siar (CnES), other statutory bodies, for example Scottish Natural Heritage and other interested parties, for example the Royal Society for the Protection of Birds (RSPB). CnES will consult with the people of the Western Isles.
- 3 The proposal fits with European, National and local policies relating to renewable energy and socio-economic development. It would provide justification for a large efficient grid interconnector to the Western Isles, opening other opportunities for up the islands to make use of their natural resources. Its construction and operation are forecast to support the creation of a total of more than 600 valuable jobs in the Western Isles. In doing so, it would contribute 40% and 6% respectively to the Scottish and UK renewable energy targets.
- 4 Some aspects of the proposal are likely to be controversial, particularly its predicted impact on protected bird species and its impact on the landscape of northern Lewis.
- 5 LWP is convinced the benefits offered by the Lewis Wind Farm outweigh any potential negative effects and believe there to be no alternatives capable of delivering the same benefits to the Western Isles. LWP believes that consent should be granted and the wind farm constructed.

2 THE SITE

- 6 The Lewis Wind Farm would be located on land leased from the Stornoway Trust, Galson and Barvas Estates.
- 7 The Stornoway Trust is community-owned with rental payments being received by the Trust on behalf of its residents. A community buy-out of the Galson Estate is being proposed. The land upon which the wind farm would be built is under crofting tenure, with crofters entitled under law to a half share of the development value of the land. As part of the leases, payments would be made by LWP to the communities of the three estates.

3 OBJECTIVES

8 The objectives of the proposal are:

- to deliver a commercially viable wind farm
- to make a major contribution to the economy of the Western Isles
- to provide justification for investment in a large efficient electrical grid inter-connector to the Western Isles with spare capacity for other renewable projects
- to make a major contribution to Scottish and UK renewable energy targets.

4 REASONS FOR THE PROPOSAL

9 The proposal follows invitation from the Department of Trade and Industry (DTI) in 2001 to review the potential for the redevelopment of the Arnish Point fabrication facility, which closed in 1999.

4.1 Political drivers of renewable energy generation

10 Through the Renewables Directive (2001/77/EC), the European Union (EU) recognises the need to promote renewable energy for reasons including:

- their contribution to environmental protection and sustainable development. Renewable electricity generation is seen as an important part of the package of measures needed to comply with the Kyoto Protocol to the United Nations Convention on Climate Change.
- their potential to create local employment and have a positive impact on social cohesion.
- their contribution to security of supply

11 In response to this directive, the UK government has put in place legislation in the form of the Renewables Obligation Orders. These require electricity suppliers in Great Britain to supply an increasing amount of their electricity, year on year, from renewable energy reaching 10.4% in 2010/11 and remaining constant thereafter until 2027. (The UK government is considering the extension of this target to 15.4% in 2015/16).

12 In parallel, the Scottish Executive has set a target that in 2010, 18% of Scottish electricity generation should be from renewable energy sources. It has reviewed the wider potential for renewable energy generation and concluded that Scotland should aspire to generate 40% of its electricity from renewable sources by 2020.

13 The Lewis Wind Farm is expected to generate 2150 GWh of electricity per year, equivalent to the domestic needs of over 1.1 million people (20% of Scotland's population) or over 450,000 households. It would contribute approximately 40% of the Scottish Executive's target of generating 18% of its electricity from renewable energy by 2010/11 and 6% of the UK's equivalent 10.4% renewable energy target. Compared to coal-fired generation, LWP's

wind farm will reduce carbon dioxide emissions by 1.85 million tonnes per annum.

4.2 Socio-economic need

4.2.1 Background: Fragility of Western Isles' economy

- 14 A number of sectors that have previously dominated the Western Isles' economy have been in long-term decline, including sea fishing, Harris Tweed, merchant shipping and agriculture.
- 15 Given the limitations of the existing business base, there have been efforts over the years to attract and develop new industries. Whilst this has met some degree of success, most notably in fish farming, tourism and supporting offshore oil and gas industries, it has proven difficult to sustain some of these. For example, the closure of the Arnish Point offshore fabrication facility in 1999 was a severe blow to the local economy.
- 16 The General Register for Scotland anticipates that the population of the Western Isles will shrink by 17% between 2002 and 2018, continuing a trend that saw the population halve to 26,500 during the twentieth century. This further fall will be accompanied by substantial falls in employment and wealth generating potential.
- 17 CnES and its community planning partners, including Western Isles Enterprise, have an economic development strategy for the Western Isles. This recognises that the Western Isles needs to play to its strengths, which includes its potential to generate energy through its natural resources. However, its strategy is being implemented at a time when its access to resources for economic development is diminishing. There has been a decline in support available through the EU over the last decade due to the change from mainstream Objective One eligibility to 'transitional' status and this will continue because of the shift in resources towards the new member states.
- 18 The National Planning Framework for Scotland, published by the Scottish Executive in April 2004, also recognises the challenges facing the Western Isles and the potential for renewable energy to contribute to a sustainable future:

"A range of economic and demographic indicators identify the Western Isles as an area facing particular challenges. The population is declining and ageing markedly. Unemployment is high, activity rates are low and GDP per head is well below the national average. Economic performance is lagging significantly behind that of the rest of the Highlands and Islands and other parts of rural Scotland.

"While the problems of rural peripherality are at their most acute in the Western Isles, their unique cultural and environmental resources are national assets with enormous potential. They are the principal heartland of Scotland's Gaelic culture and offer outstanding scenery and maritime habitats of international importance. There are large international markets for Celtic culture, built heritage and environmental tourism. There is considerable social capital, with high participation rates in community and voluntary activities. Climate and geography offer great potential for harnessing renewable energy, particularly wind, wave and tidal power. There are also likely to be

opportunities to provide support services for the development of Atlantic oil and gas reserves. Realising this potential demands co-ordinated action focused on measures to support, diversify and grow the economy, create high value jobs, retain and attract population, improve connectivity and communications, develop links with communities on Skye and the mainland, and upgrade the electricity transmission system.”

4.2.2 Recognition of the potential socio-economic contribution of renewable energy to the Western Isles

- 19 The EU and Scottish Executive recognise the potential role of renewable energy development in creating local employment.
- 20 The National Planning Framework for Scotland states:
- “Developing Scotland’s very large renewable energy potential can offer important economic benefits and contribute to the sustainable development of remote and island communities”*
- 21 The recognition by CnES and its community planning partners of the potential for renewable energy generation to be a key contributor to the socio-economic performance of the Western Isles is demonstrated in a number of key documents. These include the Western Isles Structure Plan, the Western Isles Community Plan, the Creating Communities of the Future document as well as through the Western Isles’ promotion of renewable energy through the Western Isles Alternative and Renewable Energy Partnership.
- 22 The Western Isles Structure Plan, which was approved by the Scottish Ministers in December 2003, refers to renewable energy in a number of contexts:
- maximising the opportunities for renewable and alternative energy production is identified as one of several key land use issues facing the Western Isles, many of which stem from the fragility of the local economy and the changing demographic profile
 - the commitment of CnES to the creation of a diversified sustainable economy, focusing on opportunities arising from growth industries including renewable energy
 - a reaffirmation of the Western Isles’ community planning partners’ aspirations to develop the renewable energy potential of the Western Isles based on wind, wave and other resources as a means for helping to meet the nation’s energy needs of the future.
 - a commitment to working with the Government to enable the development of renewable and alternative energy, including improvements to the electrical grid inter-connector.
- 23 The Creating Communities of the Future document expresses the commitment of the Western Isles’ community planning partners to a range of activity to create a dynamic renewable energy sector. This includes supporting community-based and community-owned renewable projects and commercial energy developments where communities achieve benefits from them. Its aspirations over the coming five years include connection to the national grid and significant and diverse employment at Arnish Point, based around a major renewable energy anchor tenant.

4.2.3 *The contribution of the proposal to the electrical grid inter-connector*

24 The existing grid connection to the mainland has a rated capacity of 22 MW, which is wholly inadequate to support anything more than an embryonic renewable energy sector.

25 The provision of a new electrical grid inter-connector from Lewis to the mainland is pivotal to the development of a renewable energy sector in the Western Isles. This is recognised in the National Planning Policy Framework for Scotland:

“The key improvements to the electricity transmission system to facilitate the development of Scotland’s renewable energy resources are the rebuilding of the grid spine between Denny and Beaulay; the upgrading of the interconnector South; and a new link to the Western Isles.”

26 Scottish Hydro-Electric Transmission Limited has undertaken scoping and feasibility studies on a new Western Isles link. This work was submitted to the Office of Gas and Electricity Markets (Ofgem) as part of its recent Transmission Investment for Renewables Generation review. Ofgem’s preliminary view, published for consultation in August 2004, was that further development work on the proposed link should not be funded by the electricity consumer. Ofgem requires greater certainty of scale, shape and timescales for renewable energy projects being established in the Western Isles.

27 LWP has modelled a number of different scenarios for determining the size of a wind farm required to justify a large efficient grid link to the Western Isles, such as the 1150 MW link proposed by Scottish Hydro Electric Transmission Ltd. Results from Ofgem’s studies published in 2004 and LWP’s own estimates have been used. LWP believes that a wind farm in the range of 500 to 700 MW would be required to justify the investment in such an inter-connector; the probability of success increases with the size of the wind farm.

28 LWP’s view is that the proposed Lewis Wind Farm is unique in its ability to present such justification now. No other credible technology, onshore wind farm proposal, or single location is capable of delivering the same benefit.

29 This view is supported by local politicians. For example, in a newspaper article in January 2004, Member of Parliament for the Western Isles, Calum Macdonald, said:

“In the Western Isles, in particular, we certainly need at least one big development in order to finance the inter-connector or sub-sea cable to carry our energy over to the National Grid. That is why I am so strongly in favour of AMEC’s big project in North Lewis, for example, providing that AMEC can guarantee that there will be plenty of spare capacity in the inter-connector for future community owned wind farms to access.”

4.2.4 The impact of the proposed Lewis Wind Farm on the Western Isles' economy

4.2.4.1 Wind turbine component manufacturing and assembly at Arnish Point

30 Based on discussions with wind turbine manufacturers, LWP believes an order of more than 200 wind turbines would be enough for a manufacturer of wind turbines to carry out a significant proportion of the turbine assembly, as well as the manufacture of towers, in the Western Isles. LWP embraces the Western Isles vision that this activity be centred at Arnish Point and will take all reasonable steps, within EU procurement regulations, to help deliver that vision.

4.2.4.2 Construction phase jobs

31 Assuming wind turbine component manufacturing and assembly is undertaken at Arnish Point, during the four year manufacturing and construction period required for the Lewis Wind Farm, LWP estimates 333 full time local jobs would be sustained over that period, as well as many others across Scotland.

32 About one third of these local jobs would be spread across the local economy, in sectors directly servicing the construction activity such as hospitality and catering.

33 The manufacturing and construction jobs would include:

- managerial and administration
- engineering (for example mechanical, civil, geotechnical, electrical)
- environmental science
- project management
- supervisory
- skilled and semi-skilled trades (for example welding, plating, mechanical fitting, electrical fitting, steel fixing, carpentry, bricklaying, plant and machinery operation)
- general workers such as drivers and cleaners

34 LWP is committed to working with CnES, Western Isles Enterprise, Western Isles Chamber of Commerce and local businesses to ensure that local people, including those working away from the Western Isles who would wish to return, would be provided the appropriate opportunities. Tangible activities would include, for example, using the database of former employees from Lewis Offshore Ltd (subject to the Data Protection Act), working with local training providers to set up appropriate courses and hosting supply-chain development events.

4.2.4.3 Operations Phase Jobs

35 LWP predicts that the Lewis Wind Farm would support 74 full time equivalent jobs in the Western Isles, comprising 33 directly employed on the wind farm and 41 supported by its supply chain. The range of jobs would include:

- managerial and administration
- engineering
- environmental science
- control room operation
- skilled and semi-skilled trades (for example electrical, mechanical and civil)
- general workers (for example maintenance and cleaning).

36 When the community payments proposed by LWP are also taken into account (see below), the wind farm would support the creation of an estimated total of 346 full time jobs (including the 74 above) during the 25-year operational lifetime.

4.2.4.4 Distribution of Rent

37 LWP would pay an annual rent of approximately £4 million for the use of the land hosting the wind farm. Its distribution is anticipated to be:

- 50% paid to the shareholders of relevant crofters' common grazings
- 21% paid to the Galson Estate (which is the subject of a proposed community buy-out)
- 16% paid to the community-owned Stornoway Trust
- 13% to the Barvas Estate

38 Should the Galson Estate buy-out proceed, 87% of the total rents would be received by crofters and community-owned trusts.

4.2.4.5 Community Payments

39 Additional payments would be made by LWP to the communities of the three estates (estimated to be a total £560,000 per annum) and to the Western Isles Development Trust (£702,000 per annum, based on the historical norm for the wind energy sector of £1000 per MW of installed capacity).

4.2.4.6 Community Investment

40 LWP made a commitment in November 2003 to develop proposals for the community of the Western Isles to invest in a portion of the equity in the Lewis Wind Farm. These proposals will be followed up in discussions with the Western Isles Development Trust.

4.2.4.7 Opportunities for research

- 41 There would be significant opportunities for developing academic research programmes associated with the wind farm. LWP will work with academic institutions to facilitate this research.

5 CONTROVERSIAL ASPECTS OF THE PROPOSAL

- 42 Aspects of the proposal are controversial, particularly its interaction with the Lewis Peatlands Special Protection Area, proximity to the Lewis Peatlands candidate Special Area of Conservation and impact on the landscape of northern Lewis.

5.1 Development in a Special Protection Area

- 43 Most of the proposed wind farm site is located within the Lewis Peatlands (SPA). This is designated for supporting populations of bird species of European importance. The area is also designated under the Ramsar Convention on Wetlands aimed at the protection of wetlands habitats and the birds they support.

- 44 The EU Birds and Habitats Directives recognise the importance of the conservation of wild birds, natural habitats and wild flora and fauna. The UK government has enacted legislation in the form of the Habitats Regulations (1994), to ensure compliance with these directives. The Regulations set out the steps that need to be taken by the competent authority (in this case the Scottish Executive) in determining whether a planning permission can be granted.

- 45 Under these regulations, development in the SPA would be permissible if LWP's proposal is found by the Scottish Executive, following an appropriate assessment, not to have an adverse impact on the SPA's conservation objectives. Development may still be permissible if there is a negative assessment of the impact on the integrity of the SPA, providing there are no alternative solutions and the project must be carried out for imperative reasons of overriding public interest (which may be of a social or economic nature).

- 46 Information collected from LWP's field research has been fed into the design process on an ongoing basis, allowing avoidance and mitigation measures to be built-in.

- 47 The key impacts identified by LWP in relation to the SPA are:

- *habitat loss and direct disturbance of habitat* – including appropriate buffer zones around each element of the wind farm infrastructure, the footprint of the proposed wind farm would take up less than one percent of the SPA area.

To mitigate this impact, LWP has put forward two proposals. The first is to re-create peat habitats using peat removed during construction. This would re-create large areas of habitat lost in the past as a result of erosion and peat cutting for fuel. In addition, LWP proposes to restore a

large area of young coniferous plantation located within the site area to its original habitat.

LWP would also phase any construction activity to avoid the bird-breeding season.

LWP believes that, with the successful implementation of these measures, the wind farm will not have an adverse impact on the habitat of the SPA.

- *disturbance and collision effects from wind turbines and other wind farm infrastructure* – there is the potential for bird species to be displaced and to collide with wind farm infrastructure.

LWP has gone to great lengths to mitigate potential impacts where possible. Nesting sites have been avoided. Bird flight paths have dictated turbine exclusion areas and corridors within the wind farm layout. In addition, the final grid connection route will be designed based on flight path information gathered. However, golden plover and dunlin are widely distributed meaning that absolute avoidance has not been possible.

5.2 Development close to a Special Area of Conservation

- 48 Parts of the proposed wind farm are close to the Lewis Peatlands candidate Special Area of Conservation (cSAC). It is designated for its habitats, most notably the second-largest expanse of blanket bog in the UK. Expert studies have concluded that the proposed wind farm would not have any adverse effect on this designated area.

5.3 Scale of the proposal

- 49 The Western Isles Landscape Assessment (undertaken by Richards/SNH in 1988) defines the landscape type of northern Lewis as having a medium-high capacity for commercial scale wind farm development. LWP's landscape and visual assessment (LVA) identifies significant effects on the landscape of northern Lewis that would last for the 25-year life of the wind farm.

- 50 The LVA concludes:

“This is the greatest capacity identified for any of the landscape character types within the study and it is extrapolated that there is no other place in Lewis that would be more suitable in landscape terms, to site a commercial wind farm of the nature proposed.”

- 51 It is not possible to mitigate the landscape and visual impact of a large wind farm on the landscape of north Lewis. The LVA concludes that the predicted impact is independent of the size of commercial-scale turbines selected.

6 CONSIDERATION OF ALTERNATIVES

6.1 Alternative technologies

- 52 A large onshore wind farm in the Western Isles is the only current means of meeting the objectives referred to in Section 3.
- 53 While the UK government is supporting other renewable energy technologies, it considers that biomass, wave and tidal may only become commercially viable in the middle of the next decade. Large-scale hydro-electricity generation is a proven technology but is not suitable for the terrain found in the Western Isles.
- 54 Offshore wind is currently being developed in several areas around the UK coast, almost exclusively off England and Wales. The last and biggest invitation for offshore projects by the DTI and the Crown Estate did not include the Western Isles in the search areas. There are currently no plans for further offshore wind rounds from the DTI or Crown Estate. There are areas of shallow water off the Western Isles, which could be used in the future. However, there would be conflicts with Ministry of Defence training areas and air defence radar facilities.

6.2 Alternative sites

- 55 LWP, based on its experience of developing the proposal, undertook a desktop study of areas in the Western Isles with the potential for siting commercial-scale onshore wind farms.
- 56 Factors taken into account included; proximity to dwellings, the shoreline and water features, slope of the land, civil aviation and military activity, available wind resource and ecologically sensitive areas. The assessment did not attempt to identify the numerous areas that might have the potential to support community-scale wind farm development.
- 57 LWP identified a number of potential sites, primarily spread across Lewis and Harris, of which one is the area of the proposed Lewis Wind Farm.
- 58 This study has shown that the objectives set out in Section 3 cannot be met from either:
- the development of all of the identified alternative areas (those lying outside of the Stornoway Trust, Galson and Barvas Estates), even if they were brought forward as a single proposal; or
 - the development of all of the identified areas lying outside of SPAs (including the relevant parts of the Stornoway Trust, Galson and Barvas Estates), even if they were brought forward as a single proposal
- 59 Development outside of the northern part of Lewis is likely to impact on areas of higher landscape value, particularly the South Lewis, Harris and North Uist National Scenic Area (NSA). LWP did not consider scenic designations as a constraint to development and a proportion of the alternatives described above lie within and close to this NSA.

7 CONCLUSION

- 60 Notwithstanding the outcome of the appropriate assessment to be undertaken by the Scottish Executive into the impact of the proposed Lewis Wind Farm on the integrity of the Lewis Peatlands SPA, LWP maintains the associated renewable energy generation and socio-economic benefits present reasons of public interest in favour of the project being consented.
- 61 Further, LWP contends that the proposed Lewis Wind Farm is the only means by which the objectives set out in Section 3, and which support the development objectives set by the Western Isles community planning partners and the Scottish Executive, can be met.