PURPOSE OF REPORT
To determine the view of the Comhairle as 'principal consultee' in respect of a consultation from the Scottish Ministers regarding plans for Stornoway Wind Farm, an application for consent under Section 36 of the 1989 Electricity Act. This application also seeks deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997.

COMPETENCE
1.1 There are no legal, financial or other constraints to the recommendations being implemented.

SUMMARY
2.1 The Scottish Ministers have asked for the view of the Comhairle on a proposed Wind Farm on Stornoway Trust land, Isle of Lewis. The application submitted to Scottish Ministers, on behalf of Lewis Wind Power Limited (LWP), comprises forty-two wind turbines with a proposed installed capacity of 151.2MW, plus associated infrastructure at a site to the west of the town of Stornoway, Isle of Lewis. The Comhairle has been given until 31 October 2011 to submit comments to Scottish Ministers. This Report details the proposal, comments received on it, and offers a conclusion and an initial recommended view to be submitted to Scottish Ministers. Copies of the Non-Technical Summary of the Environmental Statement will be made available in the Members’ lounge prior to the meeting of the Environment and Protective Services Committee on 4 October 2011.

RECOMMENDATIONS
3.1 It is recommended the Comhairle agree that the:
   a) view at paragraph 27.1 of the Report be submitted to the Scottish Ministers;
   b) Director of Development be authorised to further engage with the Scottish Government Energy Consents Unit, the Developer and Statutory Consultees regarding issues raised as part of the consultation process;
   c) Chief Executive be authorised to enter negotiations with Lewis Wind Power Ltd, and other relevant land interests to prepare a Planning Agreement; and
   d) Comhairle inform the Scottish Ministers that, at this point, there is no public interest in holding a Public Local Inquiry for the Stornoway Wind Farm application.
BACKGROUND

4.1 In June 2011, Lewis Wind Power Limited (LWP) submitted a Section 36 application to the Scottish Government for the Stornoway Wind Farm. LWP, a company, registered in Scotland specifically to develop wind energy projects on Lewis proposes to build, operate and decommission a forty-two turbine wind energy development and associated infrastructure at a site to the west of Stornoway on the Isle of Lewis. LWP is a joint venture between AMEC Project Investments Limited, a subsidiary of AMEC plc, and EDF Energy (Energy Branch) plc, a subsidiary of EDF Energy. LWP is working in partnership with the Stornoway Trust, who own the site, to develop the Stornoway Wind Farm.

4.2 Lewis Wind Power previously lodged an application with Scottish Ministers under Section 36 of the Electricity Act for a wind farm development on the north-west of Lewis in 2004. This project, known as the Lewis Wind Farm, incorporated part of the currently proposed site. The original application proposed 234 3MW turbines, this was subsequently reduced to 181 turbines in December 2006. Following Scottish Ministers’ refusal in 2008 of consent for Lewis Wind Power’s much larger proposal, LWP have made efforts to identify appropriate areas in Lewis where onshore wind energy development can take place without undue impact on the natural environment. The proposed Stornoway Wind Farm represents a new, smaller scale development proposal incorporating only a part of the original site.

4.3 This Report relates to the development of the proposed Stornoway Wind Farm, which is located approximately 2.5km from the centre of Stornoway at its closest point. The site boundary encloses an area of approximately 1,700 hectares. The location and layout of the Wind Farm are shown on the Site Plan at Appendix 1 and the Site Layout at Appendix 2 to this Report. The development site is broadly aligned to an area identified in Comhairle nan Eilean Siar’s Large Scale Wind Energy Developments Supplementary Guidance.

4.4 The development proposes the erection, 25 year operation and subsequent decommissioning of 42 wind turbines. These turbines would be 143.5m in height (to vertical blade-tip), 90m to hub, with a rotor diameter of 107m. The anticipated output for each turbine would be 3.6MW with an expected capacity of 151.2MW for the development. Details of the turbines are shown at Appendix 3 to this Report.

4.5 In addition, the development comprises associated infrastructure including vehicular access, road and river crossings, access tracks, hard standing areas, construction compound and laydown area, temporary peat storage areas (to be used during construction), 10 borrow pits, 2 permanent anemometer masts, a substation and on-site control building and underground cabling. During construction, a temporary compound will also be required to house a site office and welfare facilities. Illustrations of a typical anemometer mast are provided at Appendix 4 and a plan view and elevation of the Control Building and Compound are provided at Appendix 5 to this Report.

4.6 Accompanying the current application, LWP have included an Environmental Statement; which comprises four parts:

- Non-technical summary: of the findings of the Environmental Impact Assessment;
- Volume 1 Written Statement: detailing how the EIA process has been applied to this project; describing the proposed development; how it has evolved and reporting the EIA’s findings on each of the environmental topics identified through the scoping process;
- Volume 2 Figures: the figures to accompany the text in Volume 1; and
- Volume 3 Appendices: technical material to support the text in Volume 1.
4.7 The application is made under Section 36 Electricity Act 1989 and Ministers have also been asked to direct that planning permission should be granted for the development under the Town and Country Planning (Scotland) Act 1997.

4.8 In order to properly consider all relevant matters this Report is structured as follows:

- Section 4 Background;
- Section 5 External Consultation Responses;
- Section 6 Internal Consultation Responses;
- Section 7 Representations;
- Section 8 Comments from Applicant;
- Section 9 Policy Context;
- Section 10 ES: Landscape and Visual Impacts;
- Section 11 ES: Water and Soils;
- Section 12 ES: Ecology;
- Section 13 ES: Fisheries;
- Section 14 ES: Ornithology;
- Section 15 ES: Noise and Vibration;
- Section 16 ES: Historic Environment;
- Section 17 ES: Traffic and Transport
- Section 18 ES: Air Quality;
- Section 19 ES: Climate Change;
- Section 20 ES: Social and Economic Impacts;
- Section 21 ES: Recreation and Amenity;
- Section 22 ES: Aviation, Defence and Telecommunications;
- Section 23 Peat Stability Report;
- Section 24 Discussion of Proposals;
- Section 25 Issues Raised in Representations;
- Section 26 Policy Consideration; and
- Section 27 Conclusion.

4.9 In addition, it is important to note that the Comhairle has made a bid for Tax Increment Financing (TIF) in relation to the Stornoway Wind Farm.

4.10 Tax Increment Financing (TIF) is a means of enabling public sector investment by using the additional tax revenues generated by a development to finance borrowing to pay for the development. TIF aims to assist regeneration and attract private finance where, but for the use of the tax revenues to fund the investment, the project would not go ahead. The Scottish Government has agreed to support up to six pilot projects to explore how TIF could work in Scotland.

4.11 The criteria for these are that proposals must: invest in infrastructure that will unlock regeneration and sustainable economic growth; generate additional public sector revenues; and that these revenues, over an agreed timescale, fund the financing requirements of the enabling infrastructure. To date three projects have been agreed by the Government and on 23 June 2011 the Scottish Futures Trust (SFT) wrote to Councils inviting bids for the remaining three pilots. Of these three projects one must be a small (under £20m) project and one must have a renewables focus.

4.12 Bids were required to be submitted by 19 August 2011 and Comhairle submitted two proposals; including one for Stornoway Wind Farm as a project where the reinvestment of additional Non Domestic Rates Income would be a determining factor in the success of the project.
4.13 The Stornoway Wind Farm TIF proposal would enable the community to take up the offer of a 20% stake in the development which would unlock significant benefit for the community. It is estimated that the TIF investment would include around £17m of public borrowing, financed through the additional rates generated by the development, with the balance funded through private finance raised by the community.

4.14 The outcome of the bid is expected sometime in September 2011.

EXTERNAL CONSULTATION RESPONSES

5.1 The following are comments received by the Scottish Government (and passed on to the Comhairle) in response to its consultation process.

DIRECTORATE OF AIRSPACE POLICY CAA

5.2 Like any wind turbine development, the Stornoway Wind Farm development has the potential to impact upon aviation operations; the Department for Trade and Industry (DTI - now the Department for Energy and Climate Change)-sponsored document ‘Wind Energy and Aviation Interests’ and Civil Air Publication 764 refer¹. These documents are available at http://www.bwea.com/pdf/Wind-Energy-and-aviation-interim-guidelines.pdf and http://www.caa.co.uk/docs/33/Cap764.pdf respectively. Please note that after a full review CAP 764 was reissued on 12 February 2009.

5.3 As highlighted in the Planning Statement there is a potential to impact upon operations at Stornoway airport. The Applicant states that consultation has been undertaken with the operators of Stornoway Airport, Highlands and Islands Airports Limited (HIAL), and this should be verified by direct consultation with HIAL. Aviation safeguarding responsibility extends beyond that associated with physical safeguarding and includes the safeguarding to ensure the integrity of communications and navigation systems. Whilst the CAA’s Directorate of Airspace Policy is involved in the technical design of arrival and departure procedures at CAA Licensed Aerodromes such as Stornoway Airport, the safeguarding of those published procedures remains the responsibility of the airport operator. If the operator has related concerns and requires a regulatory input, they will approach the Instrument Flight Procedures team of DAP for guidance. With respect to safeguarding responsibilities, although the Planning Statement and Consultant’s Reports suggest that “…Further assessment should be undertaken by the CAA”, this refers to the Airport operator seeking guidance from the CAA, and is not a requirement on the CAA to undertake work on behalf of the applicant. Indeed, any such assessment on behalf of the applicant would be outside the CAA’s remit.

5.4 Similarly, the applicant has consulted NATS and states “NATS has confirmed that the technical impact of the turbines on the SSR will be operationally acceptable – meaning that no SSR mitigation is required.” Again this should be verified by direct consultation with NATS, together with the outcome of discussions relating to their Air Ground Air radio systems.

5.5 Finally, the MoD (Defence Infrastructure Organisation) should be contacted regarding any statements relating to military aviation or other interests.

5.6 Moreover if more generically, I should also highlight that:

- Although, in isolation the CAA would not make a case for lighting, unless the turbine heights exceeded 150m, I note an intention to provide aviation warning lights due to the proximity of the wind turbines to the airport.
- International aviation regulatory documentation requires that the rotor blades, nacelle and upper 2/3 of the supporting mast of wind turbines that are deemed to be an aviation obstruction should be painted white, unless otherwise indicated by an aeronautical study. It follows that the CAA advice on the colour of wind turbines
would align with these international criteria. The CAA would make no special case for marking.

- There is a civil aviation requirement in the UK for all structures over 300 feet high to be charted on aviation maps. To achieve this charting requirement, developers will need to provide details of the development to the Defence Geographic Agency. In particular we would be interested to know the promulgation schedule relating to the erection of the turbines, thereby allowing pilots to be warned of the obstacle hazard prior to their erection.

- Due to the unique nature of associated operations in respect of operating altitudes and potentially unusual landing sites, and as stated in our Scoping Opinion, it would also be sensible to establish the related viewpoint of local emergency services air support units.

HIGHLANDS AND ISLANDS AIRPORTS LIMITED (HIAL)

5.7 HIAL objects to the Stornoway Wind Farm because the development falls within the officially safeguarded areas for Stornoway Airport (as defined in Civil Aviation Publication CAP 168 – Licensing of Aerodromes, CAP 738 – Safeguarding of Aerodromes and CAP 764 – CAA Policy and Guidelines on Wind Turbines). It also falls within the area defined in the Scottish Planning Series, Planning Circular - Safeguarding of Aerodromes, Technical Sites and Military Explosives Storage Areas: The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003. The introduction of so many turbines causing infringements would also impact on the Instrument Flight Procedures, the Circling minima and the Visual Maneuuvring minimum clearance height for aircraft wishing to use Stornoway Airport. It must be recognised that HIAL will need approval from the UK Civil Aviation Authority (CAA) to amend its operational practices and the CAA expects HIAL to provide evidence that the safety of the Air Traffic Provision will not be compromised or degraded by the development. A safety case/full assessment would need to be submitted to them. This would require more detailed work to be undertaken. Approval from CAA and compliance with licensing criteria will be fundamental to the practicality of any mitigation measures that could be identified by Lewis Wind Power Limited and HIAL. Further consultation and technical analysis will be needed to fully understand the impact of so many turbines in close proximity to Stornoway Airport. HIAL are fully aware of the need to reach agreement with Lewis Wind Power Limited, which will enable HIAL to withdraw its objection to the Lewis Wind Farm Project.

NATIONAL AIR TRAFFIC SERVICES (NATS)

5.8 The proposed development has been examined by our technical and operational safeguarding teams and conflicts with our safeguarding criteria. Accordingly, NATS (En Route) Plc (“NERL”) objects to the proposal. The reasons for NERL’s objection are fully outlined in their response which is provided as Appendix 6 to this Report.

DEFENCE ESTATES (MOD)

5.9 I am writing to inform you that the MOD objects to the proposal. Our assessment has been carried out on the basis that there will be 42 turbines, 143.5 metres in height from ground level to blade tip and located at the grid references as stated in the planning application or provided by the developer.

Meteorological Office radar

5.10 The turbines will be 15km from, in line of sight to, and will cause unacceptable interference to the Meteorological Office radar at the Druim-a-Starraig weather radar. These turbines are within line of sight or the radar and are anticipated to cause significant shadowing, clutter and Doppler effects. We estimate that a sector extending approximately 20 degrees in azimuth would be affected. A key requirement for the
**Druim-a-Starraig weather radar at Stornoway is to provide advance warning of severe weather approaching from the north and west, and real-time information provided by the radar is vital to the continued operation of military and civilian aviation, as well as to forecasters in both Scotland and the wider UK (as part of the UK Weather Radar Network), including input to flood forecasting in coordination with the Scottish Environmental Protection Agency (SEPA). The degradation of the radar capability and utility would be considerable, and this is the reason for raising the objection.**

5.11 MOD is currently in discussion with the developers, who have undertaken to commission a study to identify mitigation solutions. We await the outcome of this study, but in the meantime must register and maintain an objection. If the developer is able to overcome the issues stated above, the MOD will request that the turbines be fitted with aviation safety lighting. Combination red 25 candela red infrared lights should be fitted at the highest practicable point of each of the cardinal turbines. Red 25 candela or infrared lights should be fitted on every third perimeter turbine and on four central turbines. Infrared lights should have an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration. MOD Safeguarding wishes to be consulted and notified about the progress of planning applications and submissions relating to this proposal to verify that it will not adversely affect defence interests.

**BAA SCOTTISH AIRPORTS**

5.12 This area is outwith our area of concern, therefore we would have no aerodrome safeguarding objection to this Section 36 application.

**THE CROWN ESTATE**

5.13 Crown Estate interests are not affected by this proposal and as such we have no comment to make on the proposed Stornoway Wind Farm.

**OFCOM**

5.14 No response received to date.

**BT NETWORK RADIO PROTECTION**

5.15 We have studied this wind farm proposal with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that, the Wind Farm Project indicated should not cause interference to BT’s current and presently planned radio networks.

5.16 **JOINT RADIO COMPANY (JRC) [turbines 18, 19 & 20]**

In the case of this proposed wind energy development, turbines 18, 19 and 20 are acceptable. JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

5.17 **JOINT RADIO COMPANY (JRC) [turbines 1 to 17 & 21 to 42]**

JRC objects to turbines 1 to 17 and to turbines 21 to 42 on the basis that these will cause interference to radio systems operated by Energy Industry companies in support of their operational requirements for safety management of critical national infrastructure. The Energy Industry considers that any wind energy development within 1km of a link operating below 3GHz or 0.5km of a link operating above 3Ghz requires detailed coordination. Unfortunately, part (or all) of the proposed development is located within 1Km/0.5km of a protected link site or path managed by JRC. The relevant grid refs for these links have been supplied to the developer. As a consequence JRC objects to the proposed wind farm on behalf of Scottish Hydro and itself.
5.18 The proposed development represents an intensification of the use of this site, however, the percentage increase in traffic on the trunk road is such that the proposed development is likely to have no impact on the trunk road network. On this basis we have no comment to make.

FORESTRY COMMISSION SCOTLAND

5.19 Forestry Commission Scotland does not object to the Stornoway Wind Farm, providing the following conditions are included in any consent given to the developer:

1) The application of Para 94 of NPF2 to minimise any woodland removal. If woodland is to be removed then allow for compensatory planting of an area of woodland to provide at least the same public benefits as the area (requires to be quantified) of woodland being removed. The exact detail of this can be subject to the production of a habitat management plan where the detail of proposed woodland removal, compensatory planting and any associated works can be agreed.

2) If any of the proposed area for compensatory planting were to be outside the boundary of the development site then this would need to be subject to a separate application to FCS under the Environmental Impact Assessment (Forestry) (Scotland) Regulations 1999.

3) The production within the HMP of a Woodland Plan that demonstrates the sustainable management of the woodland areas taking into account the wind farm development.

4) All to be agreed before work commences.

MARINE SCOTLAND SCIENCE-FRESHWATER LABORATORY (MSS-FL)

5.20 The ES outlines four river catchments within and in the vicinity of the proposed development area (Laxadale, Abhainn a’Ghlinn Mhoir, Abhainn Ghrioda and Abhainn Leireabhaigh) which support good to moderate salmonid densities. The report also describes the proposed development site as having a large density of water bodies and extensive peat deposits with a propensity to localised ground water flooding. Hydrochemistry and macorinvertebrate baseline surveys further suggest that the watercourses may be vulnerable to episodic acidification. Therefore disturbance, as a result of construction activities associated with the proposal, in this already sensitive location could potentially be damaging to salmonid stocks which is of concern to MSS-FL. Construction at nearby wind farms such as the consented Pentland Road, Point and Sandwick wind farms could also potentially have an impact on fisheries in the river catchments within the proposed Stornoway wind farm development area, if appropriate mitigation measures are not carried out. Mitigation measures at the Stornoway Wind Farm in the form of hydrological buffer zones, avoidance of deep peat and steep slopes, drainage schemes to avoid direct drainage into watercourses, the use of silt traps, sediment mats and settlement ponds to minimise the release of sediment into watercourses, timing of works to avoid critical fish migration/spawning periods, adherence to current best practice techniques and a fish monitoring plan (FMP) are proposed as a means of minimising any potential impacts on watercourses and fisheries.

5.21 Overall the ES is well presented, issues relating to fisheries are detailed such that it is clear as to the status of fish in the area, that the developer is aware of the potential impact of the development on fish and has taken measures to reduce these impacts in the form of mitigation and monitoring programmes with appropriate response implemented. MSS-FL would like to review full details regarding the proposed fish, macroinvertebrate and hydrochemistry monitoring programmes.
Following a review of your application and our resultant investigation our records indicate that we have water and waste water assets in the area that may be affected by the proposed development. It is therefore essential that these assets are protected from the risk of contamination and damage.

1) A detailed method statement and a risk assessment must be submitted to Scottish Water.

2) All structures must be a minimum distance of 10 metres from the nearest public water main.

3) All structures must be a minimum distance of 3 metres or depth plus 1 metre, whichever is greater, from the nearest sewer.

4) No stationary plant, equipment, scaffolding, construction or excavated material, etc. should be placed over or close to any Scottish Water assets.

5) Special care must be taken to avoid covering or filling Scottish Water assets. Arrangements for altering the level of any chambers must be made in agreement with Scottish Water and constructed in accordance with our specifications. You will have to cover the costs of this work.

6) Excavation or pumping should not be carried out in proximity of a water main without due notice having been given to Scottish Water. You will then be asked to comply with our requirements for the particular situation. Special care should be taken to prevent the removal of ground support systems at the outside of bends on any of our pipe work. If they are exposed during excavation work, they must be supported and re-covered according to our requirements.

7) In the event of any of our assets being damaged, full details must be passed immediately to our local Operations team. No-one can interfere with or operate any Scottish Water apparatus.

8) You must provide us with adequate notice and full information regarding all proposals for piling or other construction methods that may create vibrations in SW pipelines or ancillary apparatus. It is imperative that your methods of construction adhere to the accepted SW standards in order to minimise vibrations and their effect on the pipelines which could create damage or leakage.

9) When construction plant is crossing over Scottish Water’s existing apparatus, you should ensure the effective use of temporary protection to spread the weight on the water pipes and sewers to within safe working limits.

10) You or anyone working for you should not interrupt the flow of water mains.

11) You should at all times allow us access to assets belonging to Scottish Water. You must avoid the obstruction or hindrance to the prompt and efficient use and manipulation of valves, hydrants, meters or other apparatus, water mains. There should be no interference with the free discharge of scours from water mains.

12) You will give full facilities to Scottish Water and our representatives to determine by inspection or otherwise whether our pipelines are properly protected and whether special requirements of Scottish Water are being observed.

13) Scottish Water will not accept liability for any costs incurred by you or your developer in fulfilling any of these requirements.

14) If a connection to the water network is required, you must make a separate application to Scottish Water Planning and Development Services section for permission to connect. It is important to note that the granting of planning consent does not guarantee a connection to Scottish Water assets.
5.23 SEPA has been granted an extension of time to consider the application to 28 September 2011. SEPA’s comments cannot therefore be considered in this Report and will be verbally reported to the Committee if available.

5.24 SNH agree with the Scottish-Government commissioned Halcrow Report that, in principle, it should be possible to accommodate a substantial windfarm at this site. They have suggested below how the current proposal might be modified to that end.

5.25 SNH objects to the proposed development, as follows:

1. Lewis Peatlands Special Protection Area (SPA)

(a) Golden eagle: In our view, this proposal is likely to have a significant effect on this qualifying interest of the site. As a consequence Scottish ministers are required to undertake an appropriate assessment in view of the site’s conservation objectives for its qualifying interests. To help you do this, we would further advise that (on the basis of the information provided) if the proposal is undertaken strictly in accordance with the following modifications, then the proposal will not adversely affect the integrity of the site:

• Further analysis should be undertaken by the developer to identify the particular turbines, the removal of which would lower risks of collision mortality and displacement sufficiently to mitigate impacts on the factors listed below. It has not been possible for us to derive this information from the ES.

• Alternatively, removal of turbines within 500m of the boundary of the Lewis Peatlands SPA.

5.27 The appraisal we carried out considered the impact of the proposals on the following factors:

• Potential displacement of golden eagles from their range within the SPA.
• Potential cumulative collision mortality from all proposed and consented windfarms in the Western Isles Natural Heritage Zone (NHZ).

5.28 You may wish to carry out further appraisal before completing the appropriate assessment.

(b) Red-throated diver: In our view, this proposal is likely to have a significant effect on this qualifying interest of the site. As a consequence, Scottish Ministers are required to undertake an appropriate assessment in view of the site’s conservation objectives for its qualifying interests. To help you do this, we propose to carry out a scientific appraisal which you could use to inform your appropriate assessment.

5.30 To enable us to do this appraisal, the following information is required:

• A modelling exercise which takes account of the body of historical nest site data to produce a ‘realistic worst-case’ scenario for collision mortality. This is required due to the shortcomings of the data which have been used in the ES, as described below.
5.32 Once this information has been provided, we will be in a position to give further consideration to this proposal.

5.33 The proposal could raise natural heritage issues of national interest and we therefore object to this proposal until the further information detailed above is obtained from the applicant. We will advise further once this information is made available and we have completed our appraisal.

5.34 Should a wind farm be consented we **recommend** detailed post-construction monitoring. We would recommend full breeding bird and VP (year round) survey in years 1-5, 10 & 15, to be a condition of any consent.

5.35 SNH also **offers advice** on the following natural heritage issues:

2. Habits and species with special protection

5.36 Our advice on the potential impacts on the European Protected Species, otter, is that, provided the development is carried out strictly in accordance with the Environmental Statement, the proposal is unlikely to result in an offence under Regulation 39/43 of the Habitats Regulations 1994 (as amended).

3. Landscape & Visual Impacts

5.37 We consider that a windfarm could be accommodated within the proposed development site. However, we consider that the windfarm currently proposed would have significant adverse landscape and visual impacts.

**Background**

5.38 The proposed development comprises 42 wind turbines 143.5m high to blade tip (90m hub and 107m rotor diameter) and associated infrastructure. The proposed development does not overlay any designated sites, though it lies adjacent to the boundary of the Lewis Peatlands Special Protection Area (SPA).

5.39 We responded to the developer’s scoping request for the current proposal on 19 October 2010. In addition we have had considerable pre-application discussion with the developer about the current proposal.

**Impacts of the Proposal**

1. Birds

Legislative Requirements for European Sites


SNH Advice in relation to the Lewis Peatlands SPA

5.41 From the information available it appears to us that in this case the proposal is not connected with or necessary for the conservation management of these sites. Hence, further consideration is required.

5.42 Our advice is that this proposal is likely to have a significant effect on the qualifying interest of the Lewis Peatlands SPA, so that an appropriate assessment is required. We would further advise that on the basis of the information provided for golden eagle, as currently presented, the proposal will adversely affect the integrity of the site. It is possible that two breeding pair of golden eagles near the site will be displaced, or more likely, that these same pairs may experience reduced breeding success, rather than territory abandonment. This is due to the prediction that both the Achmore and Ben...
Barvas ranges will lose 8-12% of their area, which the flight line data suggests is used regularly by eagles.

5.43 As eagles are considered to be displaced by turbines at a distance of 500m, removing all turbines within this distance of the SPA boundary would ensure that none of the ranges within the SPA would be rendered unavailable to the eagles as a result of this development. We have suggested this ‘broad brush’ approach to modifying the proposal, as the data presented has not allowed us to consider which individual turbines are most significant in practice in relation to displacement, and/or collision risk. If the developer was able to analyse their data in a way that allowed identification of particular ‘problem turbines’, then this would represent an alternative approach to turbine removal.

5.44 We require more information to carry out an appraisal of the impacts upon the SPA interest red-throated diver. While the red-throated diver impacts have been calculated in the correct way, we consider there to be serious shortcomings with the input data used. These shortcomings are set out more fully at Annex 1. We therefore advise that a modelling exercise which takes account of the body of historical nest site data available to produce a ‘realistic worst-case’ scenario for collision mortality should be undertaken.

Considered in isolation, we therefore object to the proposal on the grounds of impacts upon the Lewis Peatlands SPA.

2. Cumulative Impacts

5.45 As highlighted in the developer’s note Clarification points from meeting 28/8/11, the Stornoway Wind Farm, in conjunction with the development of the consented Stornoway Wind Farm, Pentland Road, Arnish, Beinn Greidaig and Lochcarman wind farms, and the proposed Pairc wind farm, would be incompatible with maintenance of golden eagles in favourable conservation status throughout the Western Isles Natural Heritage Zone (NHZ). The population of the NHZ would potentially go into a slow decline. As the eagle population of the Lewis Peatlands SPA is drawn from this wider population, our advice is that this proposal is likely to have a significant effect on the qualifying interest of this site. We consider that, as a consequence, Scottish Ministers are required to undertake an appropriate assessment of the implications of the proposal for the site in view of the site’s conservation objectives for its qualifying interest. This assessment should in particular be based on an appraisal of the following:

- Impacts of collisions with turbines of all the above windfarms on survival of adult and sub-adult golden eagles in the Western Isles;
- Impacts of loss of territories of breeding golden eagles resulting from displacement from these windfarm developments on the Western Isles golden eagle population;
- Whether these impacts on the Western Isles golden eagle population would have an adverse impact on the integrity of the Lewis Peatlands SPA.

5.46 On the basis of information currently available, we consider that it is probable that it cannot be ascertained that the proposal will not adversely affect the integrity of this SPA. SNH therefore objects to the proposal. As noted above, removal of particular turbines most associated with collision risk may be able to mitigate this impact.

5.47 The above-noted document notes correctly that the Pairc windfarm contributes nearly 50% of the total predicted collision mortality of golden eagles. It also notes that “the Pairc Wind Farm application is currently stalled due to a number of issues and is highly unlikely to be a realistic prospect (either in terms of gaining a planning decision or construction within the next few years.” It is for Ministers to take a decision on
3. Landscape and Visual Impacts

5.48 We consider that a windfarm could be accommodated within the proposed development site. However, we consider that the windfarm currently proposed would have significant adverse landscape and visual impacts on the setting of Stornoway and over the island of Lewis, as well as in views from the sea to the south-east of Stornoway. This is mainly on account of the very tall height of wind turbines proposed (143.5m in contrast to the existing Arnish Moor wind turbines 76m high), and the location and large number/extent of wind turbines. From many viewpoints, the proposed windfarm would appear to surround and impinge upon the setting of Stornoway as well as existing landmark features such as the Stornoway war memorial, Lews Castle and the Barvas Hills. In addition, it would be prominent from across the interior peatland of Lewis and from coastal crofting areas, compromising the distinctiveness of Lewis as a whole.

5.49 The proposed development would have significant adverse cumulative impacts in combination with the existing Arnish Moor wind turbines and the consented Beinn Greidaig and Pentland Road windfarms due to its contrast of wind turbine height and layout. These significant impacts would affect settlement and crofting areas within Lewis as well as peatland areas; they would also affect views along the main transport routes across the island and key views from the ferry between Ullapool and Stornoway.

5.50 The impacts described above could be mitigated to a significant degree if the proposed wind turbines were reduced in height to be similar to existing and consented wind turbines, and were fewer in number. However, this would need to be determined in reference to amended ZTV maps and visualisations.

5.51 Were the layout to be adjusted as suggested in our advice on birds above, this may also have some mitigating effect on the adverse landscape and visual impacts predicted.

Other natural heritage interests

5.52 Blanket bog: our advice is that there are a range of mitigation and other measures that could be implemented to reduce residual impacts on peatland habitats, and these are detailed at Annex 3 as recommendations. The full SNH response is provided at Appendix 7 to this Report.

SCOTTISH WILDLIFE TRUST

5.53 In essence, we believe that the environmental impact assessment (EIA) is inadequate in relation to the impacts of the wind farm on the qualifying features of the Lewis Peatland Special Protection Area (SPA) and the Annex 1 bird species present within the proposed wind farm boundary. As such, we have no confidence in the estimates given in the EIA of the collision risk to Annex 1 species, such as red-throated diver, black-throated diver and golden eagle. In addition, we believe the destruction of blanket bog (some of which is composed of peat > 2 m in depth) which is a European protected habitat, has neither been avoided nor adequately offset as part of the development mitigation. Indeed, the proposed habitat management plan is lacking in any detail whatsoever. As the residual negative impact to blanket bog is deemed to be ‘significant’ we believe that more should have been done to compensate for its destruction. The Scottish Wildlife Trust’s full response is provided at Appendix 8 to this Report.
5.54 **THE ROYAL SOCIETY FOR THE PROTECTION OF BIRDS (RSPB)**

RSPB objects to the proposed wind farm as the information provided in the Environmental Statement is not sufficient to enable impacts relating to collision risks to birds to be properly assessed. This applies to golden eagle, red-throated and black-throated diver as qualifying features of the Special Protection Area (SPA) and to white-tailed eagles in the Natural Heritage Zone (NHZ). RSPB are prepared to reconsider their position subject to satisfactory validation of the collision risk modelling (CRM) results, based on provision of data in an appropriate format for re-analysis, supported by re-worked modelling using standard methods approved by SNH. RSPB have suggested that the removal of a number of turbines would allow them to review their position in relation to lesser impacts on golden eagles. RSPB objects to the proposal, the full response from RSPB is provided at Appendix 9 to this Report.

5.55 **WESTERN ISLES DISTRICT SALMON FISHERIES BOARD (WIDSFB)**

WIDSFB does not object to the Stornoway Windfarm but it does have concerns regarding the location of a number of turbines and certain infrastructure. The full response from the Outer Hebrides Fisheries Trust, on behalf of the WIDSFB, is provided at Appendix 10 to this Report.

5.56 **HISTORIC SCOTLAND**

Historic Scotland object to the Scheme as proposed for its impact on the scheduled monument known as Druim Dubh stone circle. Historic Scotland consider that by deleting turbines 28 and 30 this impact could be mitigated to an acceptable degree. Historic Scotland’s full response is provided at Appendix 11 to this Report.

5.57 **VISIT SCOTLAND**

The importance of Scottish tourism to the economy, and of Scotland’s landscape in attracting visitors to Scotland, is crucial to future economic growth. Therefore VisitScotland would strongly recommend any potential detrimental impact - visually environmentally and economically - of the proposed development on tourism be identified and considered in full, including when taking decisions over turbine height and number.

**INTERNAL CONSULTATION RESPONSES**

**ECONOMIC DEVELOPMENT**

6.1 Stornoway Wind Farm has the potential to generate a range of socioeconomic impacts and effects in the short, medium and long term. There are three main sources of economic impact which may arise as a consequence of Stornoway Wind Farm – a) Design/Construction Impacts; b) Operational Impacts; and, c) Community Fund Impacts.

6.2 Stornoway Wind Farm is a well thought out scheme which has benefitted from an unprecedented level of environment and landscape analysis. The socioeconomic benefits of the project are considered highly significant in the island context with 87 FTE jobs created and, subject to the procurement process, possible contracts worth £47.5 million for the island economy.

6.3 In addition, Community Fund, lease and compensatory payments in the region of £1.6 million per annum, index linked to 2010, will flow into the island economy assuming the base model of ownership. If, as is now likely, the local community, led by the Stornoway Trust, mobilise to acquire the offered 20% share of generation, this income could rise exponentially and offer unprecedented opportunities for the retail of renewable electricity to meet local demand and to satisfy the growing UK market for ethically sourced electricity.

6.4 The Stornoway Wind Farm project has the potential to boost several areas of the Outer Hebrides economy, particularly the fabrication, civil engineering and research sectors.
Jobs created in these sectors will create indirect and induced employment elsewhere in the economy as employees of the project spend their wages and as contractors source equipment and services. The significant community fund, lease and crofters’ compensatory payments will revive the community and agricultural sectors. On balance, Stornoway Wind Farm will have a significantly positive impact on the local economy.

6.5 The full response from The Comhairle’s Economic Development Service is provided at Appendix 12 to this Report.

ARCHEOLOGY SERVICE

6.6 Matters related to Cultural Heritage and Archaeology are considered within Section 11 Report. The report identifies the range of relevant cultural heritage sites or features to be assessed including above ground (the built heritage) and below ground remains. I welcome the inclusion of a dedicated chapter to assess the potential impact of any development proposal upon the cultural heritage resource. I found this report to be comprehensive and encouraged by the extensive discussions I have had with the developer and the archaeological consultants.

Relevant Policy and Guidance

6.7 Guidance relating to the construction and operation of onshore renewable energy developments state that renewable energy developments should be capable of being accommodated in location where technology is viable and environmental, economic and social impacts can be addressed satisfactorily. In order to comply with this, the applicant should ensure that the proposal is capable of satisfactorily addressing any significant impacts which may arise in respect of cultural heritage.

6.8 Guidance set out in SHEP, SPP and PAN42 notes that where nationally important archaeological remains, whether scheduled or not, are affected by a proposed development, there should be a presumption in favour of their physical preservation in-situ, and a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant effect on the setting of visible remains. Whilst the preservation in situ of archaeological remains is preferred, it may be possible to mitigate impacts to archaeological remains of less than national importance via programmes of archaeological excavation and/or Watching Brief, enabling the 'preservation by record' of archaeological deposits destroyed or damaged by a development. Regional planning guidance concerning cultural heritage is reflected in policies contained in the Structure and the Local Plan and the CNES Windfarm policy.

6.9 On page 11-8, the Report notes that the assessment will consider both direct and indirect effect on archaeological monuments/features and deposits, Scheduled Monuments, Listed Parks and Gardens and also listed buildings.

Potential direct (physical) impacts to the cultural heritage resource

6.10 The main agencies of direct (i.e. physical) impact have been discussed within the report. The impact on archaeological remains and deposits are summarised below:

- Turbine bases
- Crane hardstandings
- Access tracks
- Cable routes
- Borrow pits
- Machinery movement onto site
- Construction of temporary site compounds
- Hardstanding for site welfare / office facility
- Peat slippage
- Site landscaping
Decommissioning

6.11 Each of these stages of work clearly has the potential to impact on or destroy archaeological features or deposits and has been discussed within the report.

6.12 Section 11.5.11 States that the Historic Landscape Assessment (HLA) map does not yet cover the Outer Hebrides, this is incorrect the entire Outer Hebrides has coverage. Section 11.5.59 notes that the Stornoway wind farm would change the historic character of the landscape by introducing a new industrial land-use. Although the majority of sites will be preserved in situ, their immediate surroundings, context of the landscape and hence their integrity and ability to understand the sites in the landscape will be altered and profoundly affected. This change cannot be mitigated, but the effect on the historic landscape character alone would probably not merit refusal, I therefore would urge the developer to engage in a dialogue and enter into a voluntary arrangement with the CNES Archaeology Service to further enhance the interpretation and understanding of the archaeology within development area. This arrangement has a precedent through the Eishken Wind Farm where a regeneration plan has been agreed upon to enhance the archaeological record of the Estate.

Mitigation

6.13 As Section 11.8 notes the development has already taken into consideration appropriate design based mitigation into the siting of the turbines and other infrastructure to avoid archaeological constraints wherever possible. The mitigation works presented in the report deal with the preservation in situ of sites which can be avoided and detailed survey and excavation of sites which have been identified through the assessment and walkover as being directly impacted upon by construction. All mitigation works have been discussed and agreed upon with the CNES Archaeology Service prior to the EIA being submitted. I also welcome the inclusion of the identification of suitable peat basins for the investigation of palaeoenvironmental data.

6.14 No Invasive archaeological evaluation has taken place to inform an appropriate mitigation strategy for the impact on any unknown prehistoric features which may lie beneath the peat. A mitigation strategy can be discussed only once the results of an evaluation are available for consideration. In the event that significant archaeological remains are identified, appropriate mitigation works may be recommended. These could comprise one or more of the following:

- the abandonment or re-location of specific turbine sites;
- the abandonment or re-location of other specific elements of the scheme;
- full archaeological excavation of impacted areas prior to construction commencing in a defined area.

6.15 I advise the Comhairle to require any evaluation works to be carried out pre-determination. Pre-determination works can often save developers money, allowing an application to be adapted at the planning stage, to avoid any unplanned and costly excavation during site works. It reduces the risk of encountering unknown important remains during construction.

6.16 Where less significant archaeological remains are revealed, these areas may be dealt with by a condition requiring one or more of the following:

- an archaeological watching brief during groundworks on the least significant archaeological remains.

6.17 I recommend a phased programme of pre-determination evaluation followed by a condition outlining a mitigation strategy, publication and dissemination of the results.
However if this development is to be determined at this stage then I recommend the following condition:

6.18 No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, to inform an appropriate archaeological mitigation strategy. A timetable for the investigation must also be included to ensure that the site work is undertaken and completed in accordance with the strategy. This must be submitted by the applicant and approved in writing by the Comhairle Archaeologist. The Scheme shall provide for:

- Advance 10% evaluation on topsoil/peat strip in all excavated areas, including cabling, access tracks, borrow pits, crane hardstanding, turbine bases, substations, areas for micrositing and any other ground disturbance activities or works.
- Excavation/survey of identified sites, or preservation in situ and rerouting/relocation of construction as appropriate, and full watching brief on remaining unexcavated areas. Included in this would be the palaeoenvironmental sampling of any identified basins which are located during the stripping, and appropriate sampling for other purposes, including but not exclusively, dating, species identification, soil micromorphology.
- Fencing off of all identified sites that may be near development during construction and micrositing of turbines to avoid direct impact.
- Advance 10% evaluation of the area of any excavated structure within 20m of the visible edge of any archaeological remains, with excavation/survey or preservation in situ of identified sites as appropriate and full watching brief minimum on construction ground disturbance on such sites. Included in this appropriate sampling.
- Post fieldwork methodologies for assessment and analyses.
- Report content and arrangements for dissemination and publication proposals.
- Archive preparation and deposition with recognised repositories.
- Monitoring arrangements, including the notification in writing to CNES Archaeology Service of the commencement of archaeological works and the opportunity to monitor such works.

6.19 A copy of any analysis, reporting, publication and archiving required as part of this mitigation strategy shall be deposited at the CNES Archaeology Section within 12 months of the completion of the development hereby approved by this permission or such other period as may be agreed in writing by the local planning authority.

6.20 In addition to the condition for archaeological works, I also recommend that a condition is placed upon the application which arranges for the appointment of an archaeologist to work with the Comhairle Archaeologist to monitor all archaeological works. This will ensure that consented schemes of work are carried out to agreed best practice and proper management of the development.

ENVIRONMENTAL HEALTH

6.21 The developer has provided a detailed noise assessment for the proposed development and have taken into account potential noise from consented turbines in the area. The Environmental Health service have no objections subject to the owners of the property known as Druim Dubh proving that they have a financial involvement in the Wind Farm development and will not have any tenants in the property. The full response from Environmental Health is provided in Appendix 13 of this Report.
With regard to the Landfill site at Bennadrove, Technical Services have raised a number of concerns:

- The developer intends to use borrow sites to provide aggregate for the development. The use of the borrow sites will require some blasting and whilst it is unlikely that this will be particularly close to Bennadrove the affect on the Cell containment systems has not be assessed, so consequently mitigating measures have not been identified.

- Turbine number 9 sits immediately above the landfill site, possibly in a direct line with the new cell footprint. Consequently we would have anticipated that chapter 15 on Hydrology, Hydrogeology and Geology would have specifically considered the potential effects on the landfill site. The report describes the underlying environment very clearly and as far as we are aware accurately, so it should not be a difficult exercise for the Wind Farm consultants to model the specifics relating to turbine 9. Currently the Comhairle is involved in discussions with SEPA concerning the Hydrogeological Risk Assessment (HRA) for Bennadrove as a prerequisite to the development of the next cell. SEPA have some ongoing concerns about the upstream data and the level of groundwater within the site, complicated by a breakout during the construction of Cell 1e, the current cell. This information could have been made available to the Wind Farm upon their request. Whilst it is not certain that the installation of Turbine 9 will change the HRA for Bennadrove, the potential for this to happen should be assessed and mitigating measures or compensation for potential future costs agreed. In common with point 1 the consequence of any blasting in construction of Turbines 7, 9, 17 and the permanent supervision met-mast on the landfill site has not been assessed.

- The risk of peat slide during construction is discussed and by and large well thought through; however, we would have expected that specific attention would have been paid to this issue in relation to turbine 9 (and the permanent supervision met-mast) given their close proximity to the Landfill site and its need to control its discharges.

Also, a surface water stream flows through the landfill site and originates in the development area. This stream has been the cause of some discharge problems within the Landfill site. The Waste service is currently undertaking channelling and diversion works on this water, with SEPA’s consent, in an effort to improve leachate flows within and from the site. Although SEPA will take remedial action should construction works cause contamination of this stream it would be better to highlight the additional complications for the Landfill site pre start of construction work.

- The Environmental report identifies that there are, from time to time, issues with wind blown litter in the immediate vicinity of the Landfill site, extending as far a way as the Laxdale River. This observation is then left and not taken forward into the assessment about wind effects from the turbines. As previously stated Turbine 9 sits immediately above the Landfill site and the potential affect on the Landfill site Netting Systems and the risk of increased levels of litter leaving the site has not been considered. Turbine 17 also has the potential to increase pressure on the netting system.

- The question of litter is one which is specifically raised in the SEPA assessments of the Landfill Site and failures require to be rectified at the Comhairle’s cost. So we consider that there are two grounds, environmental hazard and revenue cost to the Comhairle, which need to be looked at during the approval process.
TECHNICAL SERVICES – ROADS

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

(i) Pre-start condition surveys be carried out by an independent specialist organisation on all those roads likely to be affected by the developments at the expense of the developers;

(ii) similar conditions surveys be carried out by the same independent specialist on a regular basis, at least six monthly intervals, at the developers' expense for the duration of the development construction;

(iii) strengthening, re-alignment and road-widening works be carried out at agreed 'pinch-point' and 'at-risk' locations, including structures, to a specification agreed with the Comhairle to safeguard the integrity of the existing infrastructure for existing traffic as well as enabling the safe passage of construction and component traffic;

(iv) the surface and general integrity of all roads used by the respective developers be maintained at their expense during all construction works;

(v) the roads affected are resurfaced to an agreed specification along the lengths affected by construction and component traffic;

(vi) the delivery of all materials and components for this development should, wherever possible, be routed through the Arnish site and not through Stornoway Town Centre;

(vii) any and all other works required by the Comhairle as roads authority to ensure compliance with all relevant statutory and legislative requirements.’

(viii) any access that joins a Comhairle road should be constructed in accordance with the enclosed access detail drawing 11/00333.’

REPRESENTATIONS

7.1 Representations have been received by the Comhairle from the following:

- Anton Michel, 1 Goathill Crescent, Stornoway;
- Helen Blake, 16A Lemreway, Isle of Lewis.

7.2 The full terms of the Representations can be read on the file at the Development Department. However, they can be summarised as follows:

- The development risks destroying a major recreational facility on the Island of Lewis, namely the River Creed fishery.
- There is a risk of destroying the Salmonid populations in the River Creed.
- Lack of consultation with key stakeholders. The developers have not consulted with the Stornoway Angling Association or attempted to determine if the wind farm will have any effect on the River Creed fishery.
- The application does not consider the implications of the wind farm on the viability of the River Creed fishery.
- No consideration has been given to effects of shadow flicker or noise on anglers fishing the river creed.
- There is no evidence to suggest that wind power is a viable economic form of renewable energy.
- There effect on the environment and the local economy will be disastrous.
• The effects on the environment include, visual intrusion, noise, dust and sediment in salmon and trout water courses, bird collisions, disruption to peat, vegetation and areas of blanket bog, traffic disruption during construction, effects on tourism and lack of resources for itinerant works.

• The island does not have the infrastructure to support such a scheme.

7.3 The Scottish Government Energy Consents Unit has intimated that to date (19/9/11) we have received 2 representations (both objections) regarding the Stornoway Wind Farm.

COMMENTS FROM APPLICANT

8.1 At the time of writing this Report no additional comments from the developer have been received by the Comhairle as Planning Authority. The Scottish Government Energy Consents Unit has confirmed that discussions are ongoing with SNH regarding the impacts of turbines closest to the SPA boundary on birds and that the developer is continuing to work with HIAL regarding aviation matters.

POLICY CONTEXT

9.1 This section of the Report aims to discuss, in general terms, current planning and other policy context relevant to the Stornoway Wind Farm development. The section does not however seek to evaluate the proposal against policy.

Climate Change and Energy Policy

9.2 Climate Change - Climate change is seen as the main challenge to deliver future development that is sustainable. The principal area of agreement concerns the urgent need to tackle greenhouse gas emissions. In Scotland it is the Climate Change (Scotland) Act 2009 that sets out the Government’s commitment to reduce greenhouse gas emissions and reduce Scotland’s vulnerability to the impacts of Climate Change. The Act introduces ambitious, world-leading legislation to reduce emissions by at least 80 per cent by 2050.

9.3 Other key framework documents on Climate Change are:

• Government Economic Strategy;
• National Performance Framework;
• Climate Change Delivery Plan;
• UK Climate Impacts Programme;
• Patterns of Climate Change Across Scotland, SNIFER, 2006.

9.4 An increase in the amount of renewable energy generation (electricity and heat) as a means of reducing carbon emissions in support of efforts to tackle climate change is supported. The Scottish Government's Climate Change Act sets a target of reducing emissions by 80 per cent by 2050, including emissions from international aviation and shipping. It also sets a world-leading interim target for a 42 per cent cut in emissions by 2020.

9.4.1 The Scottish Government is committed to promoting the increased use of renewable energy sources. This commitment recognises renewables’ potential to support economic growth. It also seeks to provide new opportunities to enhance the manufacturing capacity and to provide new employment, not least in the remote and rural areas.

9.4.2 The Government has set clear targets for renewable electricity, announcing increases in November 2007 and September 2010. Ministers want renewable sources to generate...
the equivalent of 80 per cent of Scotland's gross annual electricity consumption by 2020, with an interim milestone of 31 per cent by 2011. Similarly, a target has been set for renewables sources to provide the equivalent of 11 per cent of Scotland's heat demand by 2020.

9.4.3 Sustainable development is integral to the Scottish Government's overall purpose – “to focus government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth”.

9.4.4 A Greener Scotland - improving Scotland's natural and built environment and the sustainable use and enjoyment of it - is one of the five strategic objectives that form part of the Government's National Performance Framework, which sets out high level targets, outcomes and indicators applicable across the public sector in Scotland. Progress is reported through Scotland Performs. The Permanent Secretary's High Level Group - Sustainable Scotland provides strategic policy capacity and leadership on some of the key sustainability issues Scotland faces.

Scottish Planning Policy

National Planning Framework

9.5 In 2008 Scottish Ministers began the process of preparing a second National Planning Framework (NPF2) that acknowledges that the islands continue to face the problems of population and economic decline.

9.6 NPF2 was published on June 25 2009. Unlike the first Framework, NPF2 provides spatial guidance for a range of national developments based on the principle of promoting sustainable economic growth. Climate Change is seen as one of the principal challenges and recognises the role that renewable energy would play in addressing it.

9.7 NPF2 sees rural areas as being well placed to contribute to and benefit from the development of renewable energy given the location of the necessary wind, wave and water resources. It aims to develop the extensive renewable energy potential while safeguarding the environment and communities to achieve the Government’s commitment to development and sustaining Scotland’s energy industries.

9.8 The potential of the west coast for renewable energy development is recognised and to that end NPF2 has included, as one of the national developments, grid reinforcements to support renewable energy development and specifies a new sub sea cable link to the Outer Hebrides.

Scottish Planning Policy and Advice

9.9 The Scottish Government’s key policy document on the operation of the Planning system is ‘Scottish Planning Policy’ (SPP) which was published in February 2010. This document provides a statement of the Scottish Government's policy on nationally important land use planning matters. The treatment of any large scale renewables application is guided by the framework set out in SPP.

9.10 SPP provides a positive framework to encourage the development of renewable energy technologies. It sets targets for the production of energy from renewable sources and the requirement for Planning Authorities to provide a spatial framework for onshore wind farms of over 20 megawatts generating capacity. With specific reference to wind farm developments some key policy issues are raised in the SPP. These are:

9.10.1 Confirmation of the renewables targets for 50% of Scotland's electricity to be generated from renewable sources by 2020 and 11% of heat demand to be met from renewable
sources. Although this has now been superseded by further Ministerial statement in September 2010 whereby Ministers want renewable sources to generate the equivalent of 80% of Scotland's gross annual electricity consumption by 2020 with an interim milestone of 31 per cent by 2011. Similarly, a target has been set for renewables sources to provide the equivalent of 11 per cent of Scotland's heat demand by 2020:

- Hydro and onshore wind is expected to continue to make the most significant contribution to the targets;
- Planning Authorities are to see the Development Plan as the key framework for considering site selection and should support the development of wind farms in locations where the technology can operate efficiently and environmental and cumulative impacts can be satisfactorily addressed. Development Plans should ensure that an area's renewable energy potential is realised and optimised in a way that takes account of relevant economic, social, environmental and transport issues and maximises benefits;
- When considering cumulative impact, planning authorities should take account of existing wind farms, those which have permission and valid applications for wind farms which have not been determined;
- Planning authorities should set out in the development plan (or supplementary guidance) a spatial framework for onshore wind farms of over 20 megawatts generating capacity. The spatial framework should identify: areas requiring significant protection; areas with potential constraints where proposals will be considered on their individual merits against identified criteria, and areas of search where appropriate proposals are likely to be supported subject to detailed consideration against identified criteria;
- The main consideration in determining ‘areas of search’ in Development Plans are natural heritage, landscape, historic environment, tourism and recreational interests, aviation and defence interests, cumulative impacts, the wind resource, impact upon communities, and the electricity grid;
- When granting planning permission, authorities should include conditions for the decommissioning of developments, including their ancillary infrastructure, and for site restoration. Authorities should also ensure that sufficient finance is set aside to enable operators to meet their restoration obligations, and should consider financial guarantees through a planning agreement. A range of benefits are often voluntarily provided by developers to communities in the vicinity of renewable energy developments. These can include community trust funds. Such benefit should not be treated as a material consideration unless it meets the tests set out in Circular 1/2010 Planning Agreements;

9.11 The general thrust of SPP, with regard to renewables is towards a positive approach and a clear focus on the Development Plan as the key means to guide development. The Comhairle’s Development Plan is discussed in more detail below.

9.12 Additional Scottish Planning advice of importance to this application includes web based renewables guidance, which supercedes PAN 45 and PAN 45 Annex 2: Spatial Frameworks and Supplementary Planning Guidance for Windfarms 2008.

9.13 The web based planning advice on ‘Onshore Wind Turbines’ sets out guidance on good practice in terms of Renewable Energy. Of particular relevance to this application (which forms a useful check list) is:

- Renewable energy is seen as a positive driver for rural development;
- The adequacy of noise mitigation measures – mechanical and aerodynamic;
- The degree of disturbance caused by construction activity;
• The control of vehicle movements during construction and operation;
• The reinstatement of roads that are not strictly required for ongoing operation once construction complete;
• The restoration arrangements after decommissioning;
• The duration of consent (usually linked to life of the turbines);
• Icing problems with regard to blades;
• The impact on communications systems;
• The impacts upon civil and military aviation;
• The mitigation proposed for interference with television reception;
• The proximity to roads – at least height of blade tip (appears to have been achieved);
• Shadow flicker;
• The under grounding of power lines from turbines to sub stations; impacts of power lines from substation to the distribution system;
• The sensitivity of the hydrology of peat habitats;
• Colour;
• Locating power lines, fences, masts, buildings etc to minimise clutter;
• Visual assessments; and
• The cumulative effects of neighbouring wind farm developments – the advice states that in assessing cumulative landscape and visual impacts, the scale and pattern of the turbines plus the tracks, power-lines and ancillary development will be relevant consideration. It will also be necessary to consider the significance of the landscape and the views, proximity and inter-visibility and the sensitivity of visual receptors.

9.14 In particular, the advice provides detail on landscape and biodiversity issues, in summary:

• The ability of the landscape to absorb development often depends largely on features of landscape character such as landform, ridges, hills, valleys, and vegetation. This can also be influenced by careful siting and the skills of the designer. Different layouts of turbines may be more or less suited to particular landscape types and the physical form and/or colour of turbines may also be relevant. Selecting an appropriate route for access, considering landform change, surfacing and vegetation can also influence to what extent proposals are integrated into the landscape setting.

• As more areas of search are taken up and as more sites are proposed within or near sensitive landscapes, landscape protection and designing appropriate mitigation through conditions and/or legal agreements, will become a more routine consideration alongside maximising the potential of wind energy. In relation to landscape impact, a cautious approach is necessary in relation to particular landscapes which are rare or valued, such as National Scenic Areas.

• Landscape Assessment: Analysis of landscape impact normally requires the preparation of a zone of theoretical visibility map, to show where the windfarm may be seen from, a viewpoint analysis based on key viewpoints throughout the surrounding area, computer modelling and photo or video montages. SNH is the Scottish Government national agency and statutory advisor on landscape matters. Their guidance is expected to be followed in the first instance in respect of landscape character appraisal, landscape and visual impact analysis and wind farm design.
• Any supplementary information used to deliver local solutions to local problems must not conflict with national standards and must be a proportionate and reasonable burden on the applicant.

• Impacts on Wildlife and Habitat, Ecosystems and Biodiversity: Wind turbine developments have the capacity to have both positive and negative effects on the wildlife, habitats, ecosystems and biodiversity of an area. For example, the effects of climate change are known to have damaging effects on wildlife, habitats, ecosystems and biodiversity, and the production of renewable energy counters this. There are also many opportunities for wind turbine developments to introduce environmental improvement through land management, land restoration and habitat creation, as part of a development scheme.

• At the same time, there is also the potential for negative environmental effects, with possible loss of or damage to valuable habitat resulting from construction of turbine bases, access tracks or other works. Such impacts can be significant particularly if they relate to habitats that are difficult to replicate. There is also the potential of collision risk, displacement or disturbance by forcing birds or bats to alter flight paths. Wind farms should not adversely affect the integrity of designated sites protected under EU and UK legislation (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs)) or wider conservation interests outlined in the SPP. Negative effects can also be at a distance from the turbines if works alter the hydrology of an area or if access roads create barriers to movement of protected species. Again, there is scope for mitigation in the location of wind turbines, construction techniques, design measures and management.

9.15 Other Guidance and Planning Advice Notes of relevance include:

• PAN 42 Archaeology - The Planning Process and Scheduled Monument Procedures (1994);
• PAN 56 Planning and Noise (1999);
• PAN 58 Environmental Impact Assessment (1999); and
• PAN 60 Planning for Natural Heritage (2000).

Development Plan

9.16 The current Western Isles Development Plan consists of two elements. Strategic Land Use Policy is set out in the Western Isles Structure Plan, approved in 2003, and detailed local guidance is set out in the Western Isles Local Plan, adopted June 2008. The Development Plan provides a framework to develop and sustain the communities of the Outer Hebrides and will favourably consider renewable energy developments subject to the considerations set out within its policies and proposals. In line with the modernisation of the planning system and new legislation requirements, preparation of the new Outer Hebrides Local Development Plan has commenced, which will in due course supersede the existing Development Plan. In September 2011 the Comhairle approved a Proposed Local Development Plan and associated documents for public consultation which is open for comment until November 2011.

9.17 The Structure Plan’s key aim is to provide a land use planning framework for sustaining the communities of the Western Isles by:

Setting out policies that:

• promote sustainability and improve quality of life;
• encourage population retention, inward migration and address the imbalances in the demographic structure;
9.18 A number of more specific Structure Plan policies have a bearing on this application, covering the topics of Development Management, Resource Management, Economic Development, Housing, Community and Leisure Facilities, and Transportation. The main renewable energy policy, a criteria based approach, is contained in the Structure Plan, policy ED2 below:

**ED2 Development of Alternative and Renewable Energy Resources**

9.18.1 'The Comhairle, in partnership with other public agencies and the private sector, will develop proposals that help realise the latent renewable energy development potential of the Western Isles. It will also promote improvements to the interconnector with the mainland to enable the export of energy.

9.18.2 Development proposals for hydro, solar, wave, tidal and wind (on-shore and off-shore) energy schemes and associated infrastructure, including proposals for non-grid, domestic-scale schemes, will be viewed positively, subject to satisfactory assessment of all of the following:

i) the impact on local communities and any other existing or proposed land uses and interests;

ii) the impact, including cumulative impact, on natural and built heritage resources;

iii) the local and wider benefits that the proposal may bring;

iv) the adequacy of reinstatement arrangements;

v) the requirements of other Structure Plan policies.

9.18.3 Non-permanent structures will normally be approved for a temporary period.

9.18.4 Having regard to the above criteria, the Local Plan will identify potentially suitable sites including provision of safeguarding or exclusion areas to ensure that future neighbouring developments or activities do not undermine the viability of the energy resource.’

9.19 Taking account of SPP by the Comhairle supplementary guidance was approved by the Comhairle in July 2010 and is a material consideration in the determination of planning applications for wind energy developments, as part of the Development Plan (see below for further details). Once the new Outer Hebrides Local Development Plan is adopted this Supplementary Guidance will become statutory as part of the Development Plan.

9.20 Some of the key issues for this development from the Development Plan are:

- The Structure Plan provides the criteria based approach to assessment.

- Local Plan policy LP/ED3 refers to ‘protecting areas’ with existing renewables planning consents:

  *Development proposals adjacent to sites with planning consent for renewable energy development will be considered carefully in order to safeguard the viability of the energy resource.*

- The Comhairle has supplementary guidance in place for renewable energy.

**Supplementary Guidance**

9.21 The Comhairle has approved Supplementary Guidance as of July 2010. Whilst this is not statutory Supplementary Guidance it should be regarded as a material planning consideration. As outlined above this guidance will become statutory under the new Local Development Plan.
9.21.1 The Supplementary Guidance: Large Scale Wind Energy Developments (>20MW)

Comhairle was prepared following stakeholder/public consultation and was approved by the Comhairle in July 2010. Accordingly, it should be referred to in the assessment of this application. The aim of the guidance is to set out policies and other advice to assist in positively planning for the provision of large scale wind energy developments (over 20 Mega Watt) in the Outer Hebrides. Section 4 of the Supplementary Guidance, Spatial Policy, and Section 5 Development Criteria are particularly relevant. This application should also be assessed in relation to the identified ‘broad areas of search’.

9.21.2 A number of sizeable search sites have been identified in the Supplementary Guidance which provide a clear steer to developers on locations which are more likely to be acceptable, in principle, for large-scale wind farm developments. It should be borne in mind that the areas of search identified in this Guidance are essentially ‘search areas of least constraint’ rather than ‘preferred areas of development’, and development within these areas will still be subject to the policies of the Guidance’s Development Criteria and those of the Development Plan.

9.21.3 The Development Criteria set out in the Supplementary Guidance aim to provide clarity on the issues that should be addressed to enable development to take place. For large scale developments all criteria must be satisfied in all areas of the Outer Hebrides.

9.21.4 The Guidance assesses a development in relation to the following Development Criteria: Natural Heritage; Landscape and Visual Impact; Community; Water Resources; Historic Resources; Aviation and Defence; and Cumulative Impact.

9.21.5 The Spatial Policy and Development criteria are also supported by Additional Advice and Good Practice and developers are encouraged to evidence that they have considered the issues raised in this section.

9.22 In addition, the following supplementary guidance will be used in the consideration of development proposals:

1. As well as taking account of the key criteria identified in the Supplementary Guidance Section 5 Development Criteria, for proposals that may affect nature conservation designated areas, it will be for the developer to show that:
   a) the reasons for the designation will not be irreversibly damaged and that the designated area has the capacity to accommodate the proposed development through mitigation and management arrangements, and that;
   b) mitigation, management and compensatory measures are proposed to safeguard protected species in and around the development site.

2. In the assessment of the likely impact of proposed onshore wind energy developments, consideration will be given to the “Landscape Capacity Study for Onshore Wind Energy Development in the Western Isles” (2004).

3. Medium and large scale renewable energy developments (as a rule, those with more than 1 MW generation capacity) will normally be subject to a requirement for completion of an agreement under Section 75 of the Town and Country (Scotland) Act 1997 to include:
   - Land restoration during and after completion of the development phase, and at any time when any part of the development is modified or becomes redundant and the taking out of a reinstatement bond to ensure acceptable restoration;
   - Off site works to roads or other services that reasonably require improvements to accommodate the proposed development;
• Any safeguarding or remediation works to any off site feature or receptor that may be affected by the proposal.

**Other Relevant Matters**

9.23 ‘It’s in Your Hands: A Strategy for the Conservation and Enhancement of Biodiversity in Scotland’ sets out the vision for Scotland's biodiversity. It gives a 25 year framework to conserve and enhance biodiversity for the health, enjoyment and well-being of the people of Scotland, in the context of the EU commitment to ‘protect and restore the functioning of natural systems and to halt the loss of biodiversity’.

9.24 The Nature Conservation (Scotland) Act 2004 places a statutory duty on all public bodies to further the conservation of biodiversity in exercising any of their functions. Planning Authority functions play a key role in fulfilling this duty and in ensuring that the natural environment remains a key consideration in the sustainability of human activity and to quality of life.

9.25 There are a number of other publications and guidance published which have relevance to this application. These include:

- CnES Western Isles Local Biodiversity Action Plans;
- CnES Outer Hebrides Access Strategy 2006;
- Landscape Capacity Study for Onshore Wind farms in the Western Isles – SNH/CnES;
- Habitats and Wild Birds Directives (Habitats Directive (SE circular 9/95 - revised 2000));
- SNH Guidelines on the Environmental Impacts of Wind farms 2001;
- SNH policy on Renewable Energy 2002;
- SNH Strategic Locational Guidance for Onshore Wind farms in respect of the Natural Heritage – updated March 2009;
- SNH papers on Wild Land Search Areas;
- Controlled Activities (Scotland) Regulations – 2005;
- RSPB: Wind farms and Birds 2003;

9.26 In June 2006 a research report was completed entitled “Bird Sensitivity Map to Provide Locational Guidance for Onshore Wind farms in Scotland”. The report was prepared by the RSPB and jointly funded with SNH. The sensitivity map was produced at 1km square resolution, with each 1km square in Scotland assigned one of three sensitivity ratings. The report indicates that particular sensitivities occur in the Western Isles as well as other areas in the North West of Scotland.

**SUMMARY OF THE ENVIRONMENTAL STATEMENT:**

**LANDSCAPE AND VISUAL IMPACTS**

10.1 Stornoway Wind Farm Environmental Statement Non Technical Summary (NTS) states that: the Landscape and Visual Impact Assessment (LVIA) has been conducted in
accordance with relevant guidance on aspects including: siting; design; assessment; and image presentation.

10.2 The LVIA concludes that the Stornoway Wind Farm would form a new landscape feature/visual focus, set within a predominantly moorland landscape approximately 2.5km from Stornoway. The most notable effects are considered to occur within an approximate 5km radius of the proposed development, however significant effects would occur out to distances of around 14km in some cases, particularly where high sensitivity receptors would experience elevated, open views in the direction of the proposed wind farm, due to the relatively open nature of the landscape and the lack of intermediate screening.

10.3 The host Landscape Character Type is Boggy Moor 1 and, overall, there would be significant landscape effects on it. There would also be localised significant landscape effects on parts of the adjoining Landscape Character Types as well as nearby landscape designations, including localised parts of the Lewis Castle and Lady Lever Park Garden and Designed Landscape, and Scottish Natural Heritage’s “search area for wild land”.

10.4 Significant visual effects would be experienced by some local residents within the settlements of Stornoway, Tunga, Ranais, Col, Cromor and An Cnoc (albeit some residents would not see the wind farm from their property) as well as five properties/groups of properties located outwith the main settlements, but in close proximity to the application site. Significant visual effects would also be experienced by road users on the A858, A859, B897 and Pentland Road; walkers on (parts of) the Timeless Way and Core Path 6; as well as visitors to the Stornoway War Memorial, recreational users of Stornoway Golf Club; and anglers fishing at rivers and lochs within approximately 14km of the proposed development at locations where clear, unobstructed views of the turbines are possible.

10.5 The Stornoway Wind Farm would frequently be viewed simultaneously with the operational Arnish Moor Wind Farm, as well as the consented (but not yet built) Pentland Road Wind Farm, Point and Sandwick Wind Farm, and Creed Business Park Turbine. However, cumulative effects with other consented wind energy schemes within the study area would generally be reduced due to the distance between the different schemes.

10.6 Whilst no wind farm development can avoid significant landscape or visual effects from receptors within or close to the proposed turbines, 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 study area. These are considered to be of sufficient scale to accommodate a development on the scale of the Stornoway Wind Farm.

SUMMARY OF THE ENVIRONMENTAL STATEMENT:

WATER AND SOILS

11.1 The hydrology, hydrogeology and geology assessment in the Environmental Statement has considered potential effects relating to flows, groundwater and surface water quality, channel characteristics, and wetlands that could occur as a result of the construction, operation and decommissioning of the Stornoway Wind Farm.

11.2 The assessment has used available records and site visits to avoid effects through the design process where possible. The number of watercourse crossings has been minimised and considerable attention has been paid to the locations of infrastructure to reduce the potential for adverse effects. This includes the alignment, where possible, of access tracks along watersheds, and seeking to achieve a 50m stand off between
construction activities and waterbodies and watercourses. Detailed design measures are proposed to minimise effects on water flows including the use of a “floating” track design, along with other measures such as the installation of appropriate cross drains, and the selection of types of watercourse crossing suitable for specific circumstances to minimise the potential for changes in flow and drainage regimes. A considerable amount of best practice guidance has also been taken in to account, along with additional site-specific measures that have been included to reduce potentially significant effects.

11.3 Taking in to account these measures, it is concluded that the proposed development will result in no significant effects in terms of the EIA Regulations on hydrology, hydrogeology or geology.

SUMMARY OF THE ENVIRONMENTAL STATEMENT:

ECOLOGY

12.1 The NTS states that the effects of the Stornoway Wind Farm on ecology, focusing on vegetation, otters, freshwater pearl mussels and freshwater invertebrates, have been assessed. Ecological surveys were conducted within the footprint of the proposed scheme by experienced ecologists with the results identifying all highly sensitive areas being incorporated into the design phases to ensure that the development avoids the most sensitive habitats, features and rare species.

12.2 The majority of the proposed footprint of development consists of good quality, healthy, active blanket bog, with heath and grassland communities also present. Some forestry is present on the development site, but due to the low levels of nutrients in the peat soil, trees are generally in poor condition. Peat cuttings are present across the site and were recorded to be in a healthy regenerating state. There was limited bare ground present across the footprint. The development site has no conservation designation status; however some rare species were recorded and bog pool systems were considered of high sensitivity. These areas were avoided during the design of the Stornoway Wind Farm layout, with preference for construction in poor quality plantation areas and other less sensitive features within the development site.

12.3 Evidence of otters was present across the majority of the development site with many potential shelters mainly along the watercourses. Otter paths and holts were identified and the design of the Stornoway Wind Farm has avoided these features to reduce the potential for disturbance during construction activity. No evidence of freshwater pearl mussels was found on the development site, however good quality habitat for these was found and the siting of water crossings avoided these locations. The freshwater invertebrate communities recorded indicate high water quality across the development site. No rare freshwater invertebrates were recorded.

12.4 Potentially significant impacts associated with the Stornoway Wind Farm include habitat loss, change of composition of plant communities due to hydrological change, disturbance to otters and pollution of watercourses. Mitigation measures including following industry best practice, and micro-siting of the infrastructure to avoid most sensitive areas, have been incorporated into the scheme design. Drainage will be designed to ensure it does not change natural characteristics around all excavations, and to minimise impacts to the wider area.

12.5 The habitat loss of blanket bog under the footprint of the development is considered to be significant. However compensatory restoration of drained plantation areas and areas of peat cutting within the development area will increase blanket bog habitat on site, and will reduce the effect of habitat loss to be insignificant in terms of the EIA Regulations. Low levels of effects that are adverse are predicted for other habitats and species, but are not significant in terms of the EIA Regulations.
SUMMARY OF THE ENVIRONMENTAL STATEMENT:

FISHERIES

13.1 The term “fisheries” refers to natural fish populations and recreational fisheries’ interests, with key receptors comprising of individual fish species and their specific habitat requirements. The Stornoway Wind Farm’s potential impacts on fishing were considered within Chapter 7, Socio-Economic Assessment.

13.2 Electrofishing surveys were completed in 2010 on the four main river catchments: the River Creed, Glen River, River Tope and River Laxdale. This, along with analysis of historical records and consultation findings, helped to identify existing baseline conditions and the level of value of each key receptor. The potential effects and magnitude of the effects on the receptors have then been identified. Important fish populations present within the wind farm boundary include Atlantic salmon, brown and sea trout, European eel, and three-spined stickleback. Whilst present in the general area, lamprey (brook, river and sea) were not found in surveys of watercourses on site.

13.3 Through an iterative design process, potentially adverse effects have been identified and substantially avoided through design changes. This has included minimising the number of watercourse crossings, avoiding any crossings of the main channel of the River Creed, and ensuring that construction activity (except at watercourse crossings) is at least 50m from any watercourse. These changes coupled with additional mitigation measures (such as the use of best practice construction techniques, control of run-off, the timing of works and avoidance of sensitive periods) are considered to reduce the residual effects on fish species to levels that are not significant in terms of the EIA Regulations.

SUMMARY OF THE ENVIRONMENTAL STATEMENT:

ORNITHOLOGY

14.1 A comprehensive programme of consultation and survey has been undertaken to inform the ornithological assessment of the Stornoway Wind Farm. Studies undertaken have included field surveys using methods agreed with consultees to investigate breeding, migrating and overwintering bird populations. The findings of the studies, which have identified species such as golden eagle and red throated divers amongst many others, have influenced the scheme design process. The potential for effects on red throated divers led to reductions in the extent of the Stornoway Wind Farm with turbines removed from the south of the A859. Turbines have also been moved within the development site to respond to survey findings, for example by drawing them away from the far north west of the site to address concerns over golden eagle. Further mitigation measures have also been proposed to avoid effects on breeding birds during construction.

14.2 Based on the design changes, the mitigation measures and the abundance and distribution of bird activity within the survey area, it is concluded that the effects of this development on both target species and designated sites are not significant in terms of the EIA Regulations.

SUMMARY OF THE ENVIRONMENTAL STATEMENT:

NOISE AND VIBRATION

15.1 As part of the environmental statement a noise assessment was carried out for the proposed Stornoway Wind Farm. The assessment considered noise from construction, operation and decommissioning of the wind farm. It is concluded that the relatively high separation between turbines is sufficient to ensure that any construction or decommissioning noise effects will be minimised. No significant effects are anticipated in this regard.
15.2 Operational noise was assessed in accordance with the ETSU Guidance. The design of the Stornoway Wind Farm scheme is such that using the greatest sound power levels over a range of commercially available turbines (assessment envelope), the operational noise levels from the wind farm lie within noise limits derived from measurements taken at the surrounding receptors.

15.3 A range of turbines are appropriate for the Stornoway Wind Farm, the final model eventually being selected by competitive tender. Any turbine installed will be required to meet the noise limits, inclusive of any penalties for tonal noise.

15.4 A cumulative assessment of the Stornoway Wind Farm, existing Arnish Moor Wind Farm, and the consented Creed Business Park Wind Turbine, Pentland Wind Farm and Point and Sandwick Wind Farm found that all projects can operate concurrently without creating a significant noise impact at the nearest sensitive receptors. Noise levels from the cumulative noise assessment demonstrated that predicted turbine noise levels would be at least 3.4dB lower than the ETSU Guidance defined noise limit at all assessed wind speeds.

15.5 Consequently, it is concluded that the Stornoway Wind Farm scheme will have no significant effects in relation to noise.

SUMMARY OF THE ENVIRONMENTAL STATEMENT:

HISTORIC ENVIRONMENT

16.1 In relation to the historic environment the NTS states that: the likely effects on archaeology and built heritage interests from the construction and operation of the Stornoway Wind Farm have been assessed. The assessment was designed to identify and record any historic features present within the development site through a desk-based study and a detailed site walkover, as well as through consultation with Historic Scotland and CnES. The assessment also identified any heritage assets within 10km of the development site boundary, or beyond this if specifically requested by consultees, that could have their settings affected.

16.2 Seventy-one historic features have been identified within the development site. The majority of these are associated with medieval or later land-use, particularly the seasonal movement of livestock to summer pastures. There is also some evidence for earlier prehistoric settlement in the area. The majority of the upstanding archaeological remains survive on the high drier knolls within the development site.

16.3 The potential for as yet undetected buried archaeological remains to survive within the development site is considered to be moderate. However, taking into account the limited extent of ground disturbance arising from the construction activity, the probability of encountering undiscovered sites of archaeological importance is considered to be low.

16.4 The development has been designed to avoid where possible all significant archaeological remains. No substantial direct effects are predicted on any of the historic features; however, a group of shieling huts, a head-dyke and the former Lewis Chemical Works would receive direct effects. These effects can be offset by mitigation (which would include detailed survey and archaeological evaluation) and therefore there is considered to be no significant effect in terms of the EIA Regulations.

16.5 Indirect effects on the setting of various historic features (including Scheduled Monuments, Listed Buildings, a Conservation Area, and a Garden and Designed Landscape) are predicted within 10km of the development boundary. Of these, significant indirect effects have only been predicted on the setting of one Scheduled Monument (Druim Dubh stone circle, which lies immediately to the south of the development site) and on one Category B Listed Building (Stornoway War Memorial). No
other significant indirect effects are predicted on the setting of heritage assets within the wider landscape.

SUMMARY OF THE ENVIRONMENTAL STATEMENT:

TRAFFIC AND TRANSPORT

17.1 The ES assessment of traffic and transport considers the potential impacts of traffic generated during the construction and operational phases, proposed access arrangements and measures to minimise disruption to the local road network.

17.2 The Traffic and Transport chapter has been prepared following a period of scheme development work to define the scheme, the materials required for the construction of the Stornoway Wind Farm, the delivery of the wind turbines and other components, and the construction methodology itself. This informs the Traffic and Transport chapter with regard to information such as material sources, working hours and the construction programme. A review of this information has confirmed that there is only a minimal increase in traffic on the adjacent trunk road network, negating the need for a full traffic impact assessment. In particular the use of on-site borrow pits as a source of aggregate means that only a small amount of stone is initially required from off-site commercial quarries to create access to the first borrow pit on site. This material will be brought in on the existing highways along with concrete, the wind turbines and other necessary construction materials.

17.3 The intention is to source the turbine towers from the Arnish fabrication facility and to source concrete and a limited amount of stone from local quarries. Construction Heavy Goods Vehicles (HGVs) traffic associated with the delivery of turbine components and construction materials is proposed to be routed to the site via the Arnish Point access road and the A859 respectively for the delivery of turbine components and construction materials.

17.4 Access to the site will be via access points A and B (Figure 1.2) on the A859 as well as via three locations on the A858 (Pentland Road). Access points C and D on the A858 are part of a site crossing point between turbine numbers 17 and 18. This crossing point would also be used for the delivery of turbine components and HGVs supplying construction materials to the Northern turbine group. When combining the construction programme for the forty-two turbines, the maximum traffic impact on the highway associated with the whole development is predicted to occur in months 11 to 13 of the construction programme when an average of 98 HGV movements is predicted to be generated on each working day during these months, i.e. 49 HGVs in and 49 HGVs out. The majority of construction HGV movements will occur within the site on new and upgraded tracks.

17.5 Whilst this level of traffic and transport effects is considered not to be significant in terms of the EIA Regulations, it is recognised that there is potential for reducing and managing the impact of the construction traffic through the implementation of a Traffic Management Plan (TMP).

17.6 The TMP will detail measures aimed at minimising adverse environmental effects associated with traffic and transport during construction and is likely to include details on car parking, temporary road signage requirements, off-loading proposals, construction traffic routing and timing of deliveries.
SUMMARY OF THE ENVIRONMENTAL STATEMENT:

AIR QUALITY

18.1 The ES assessment considered the potential impacts of the Stornoway Wind Farm on air quality. Temporary air quality impacts could arise during construction due to the emission of air pollutants and dust from vehicle movement and construction processes. The assessment concludes that due to the types of activities that are expected to occur on the development site, the adoption of construction best practices measures, and the location of people in relation to the construction activities, air quality effects during construction are likely to be of negligible effect and not significant in terms of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 (the "EIA Regulations").

18.2 The assessment also concludes that air quality impacts during operations of the Stornoway Wind Farm are likely to be negligible as emissions to air are only likely to occur from maintenance vehicles.

SUMMARY OF THE ENVIRONMENTAL STATEMENT:

CLIMATE CHANGE

19.1 The Stornoway Wind Farm has the potential to reduce carbon emissions through the generation of renewable energy and displacement of fossil fuel based energy. However it also has the potential to release some carbon through changes in land-use, and carbon emissions associated with the manufacture, construction and operation of the wind farm. Based on its predicted capacity factor (i.e. the proportion of the theoretical output that the wind farm achieves) the Stornoway Wind Farm is expected to result in substantial carbon savings by displacing fossil fuel generated electricity. The site design and proposed construction techniques have aimed to minimise disturbance to peat and hence will minimise carbon losses associated with peat drainage or removal, although there remains some uncertainty over the exact impacts on peat until completion of detailed ground investigations and design. Taking this into account the Stornoway Wind Farm is expected to have a payback time of around 8 months where fossil fuel generated electricity is displaced. That is, after 8 months of operation the carbon emissions saved by not burning fossil fuels will exceed the emissions associated with the Stornoway Wind Farm. Different scenarios in these calculations give a best case payback scenario of 2 months and a worst case payback scenario of 47 months. Overall these payback periods are relatively short compared to the 25 year design life of the wind farm. This is considered to be a significant benefit in terms of the EIA Regulations.

SUMMARY OF THE ENVIRONMENTAL STATEMENT:

SOCIAL AND ECONOMIC IMPACTS

20.1 The assessment of social and economic impacts considers the impacts of the development, in terms of direct and indirect job creation and expenditure, on the relatively weak and undiversified economy of the Outer Hebrides. It also assesses the impact of the scheme on existing economic activity including the tourism sector. Local sourcing of labour and materials will have a sizeable impact on employment and income during the construction and operational phases of the Stornoway Wind Farm, particularly if the turbine towers are sourced at the Arnish Fabrication Facility near Stornoway. In addition, the introduction of new and substantial income streams into the local economy in the form of a community fund, lease rental payments to the landowner and compensatory payments to crofters for the development's use of crofting land, all have the potential to bring wider benefits to the local community. How these funds are managed will determine the exact scale of the socio-economic impacts. Considerable benefits will also accrue from any community ownership scheme. There is some limited potential for negative impacts (for example, relating to traffic and localised adverse
tourism impacts) during the construction phase. However during the operational phase, no existing business activity is expected to be curtailed as a result of the Stornoway Wind Farm, with public access limited to existing legitimate uses, as at present.

20.2. The socio-economic assessment concludes that the construction and operation of the Stornoway Wind Farm will generate a sizeable level of additional inputs in the context of the local economy. This will in turn support a variety of jobs in the local economy and new skills development. The design and construction phase will be short-term (30 months). However, one indirect effect of the sourcing of local labour and materials could be to develop local manufacturing and supply chain potential which may lead to further opportunities for renewable energy (including other onshore wind developers and marine renewables) in the future. The key findings of the assessment are:

- £48 million of materials and labour are predicted to be sourced within the Western Isles during the construction phase;
- The construction phase could directly support 196 jobs in the Western Isles and a further 181 in Scotland. The majority of these jobs will be high value jobs associated with civil engineering, construction and manufacturing of towers;
- Overall, more than 790 jobs could be supported across Scotland by the construction and operation of the Stornoway Wind Farm, relating to direct, indirect and induced effects, of these 247 jobs would be based on the Western Isles;
- In addition, almost 25 jobs could be supported on the Western Isles as a result of the community benefit, lease rental payments and compensatory payments to crofters in relation to direct, indirect and induced effects; and
- The value of these funds accruing to the local community, discounted to a net present value, could amount to over £28 million.

20.3 Furthermore, by strengthening the case for the delivery of the subsea interconnector, the Stornoway Wind Farm would not only contribute directly to the UK and Scottish Government’s economic strategies on promoting renewable energy and meeting climate change targets but would also contribute to broadband connectivity on the Western Isles and thus have an even greater enduring employment and income impact than the Stornoway Wind Farm proposal in its own right.

SUMMARY OF THE ENVIRONMENTAL STATEMENT:
RECREATION AND AMENITY

21.1 As part of the Socio-economic assessment, the ES has examined the impact of the proposed Stornoway Wind Farm on the Tourism Sector in the Outer Hebrides.

21.2 Stornoway is one of the principal gateways for tourism arrivals in the Western Isles and the Stornoway Wind Farm is located 2.5km to the west of Stornoway. Potential impacts on tourism could arise from construction related disturbances (e.g. noise and congestion) and increased demand for local services, particularly accommodation during the construction phase, as well as from the visual impact of the turbines in the operational phase.

21.3 In 2006, 196,000 visitors (more than seven times the resident population) visited the Western Isles, contributing nearly £50 million to the economy. It has been calculated that on average, each visitor spends approximately £255 in the Western Isles, providing a considerable contribution to local income.

21.4 Employment in the tourism industry on the Western Isles has fluctuated over the years but currently accounts for around 9% of total employment, accounting for around 1,000
FTEs including direct employees, self employed, indirect and induced employment. The industry employs a higher than average proportion of females, 65% in the case of the Western Isles, and the work tends to be seasonal, part-time, low skilled and low paid with little opportunity for upskilling or progression. To some extent this fits with the working pattern on the islands where many people maintain a portfolio of relatively informal jobs linked to crofting, agriculture, fishing and tourism.

21.5 A study undertaken by Sneddon Economics (2007) provides the most up-to-date analysis of accommodation stock on the Western Isles. The review was based on all available information provided through VisitScotland, and also other promotional activity. The analysis shows that there are approximately 431 properties offering visitor accommodation, of which 40% are located on the Isle of Lewis.

21.6 The Stornoway Wind Farm could have a direct impact on guest accommodation due to the anticipated influx of workers during the construction phase. LWP have stated that there will be no provision for wind farm workers to be accommodated on site, so that any influx of migrant labour would tend to benefit local accommodation providers directly. On the other hand, LWP are keen to ensure that, where appropriate, local labour will be employed during the construction phase. To the extent that this is the case, pressure on local accommodation will be eased. This notwithstanding, an increase in demand for accommodation during the wind farm construction phase will have a beneficial impact on rates of occupancy albeit it could inconvenience existing tourists and lead to the loss or at least postponement of some tourism trips until after the construction period has been completed. On a more positive note, however, an influx of additional accommodation demand could also provide an additional impetus to increasing the available accommodation stock on Lewis.

21.7 A survey conducted on behalf of VisitScotland during 2009 indicated that in 2009, the most popular activities in the Western Isles were general sightseeing, beaches/seashore, historical sights, photography, museums, visitor centres and hill walking. These activities have consistently been the most popular over the period 1998 - 2009. This survey also showed that visitors to the Western Isles tend to be middle aged or older and that the proportion of repeat visitors has increased steadily over the period, although decreased slightly in the most recent period (2009). In 2009, a record proportion of visitors were first time visitors and the greatest growth in first time visitors was from the UK, which could be due to a higher proportion of UK residents holidaying within the UK observed during this time. There was a marked increase in visitors coming to visit friends and family (again perhaps as a result of RET and the Scottish Government's Year of Homecoming campaign in 2009).

21.8 It is clear from the evidence presented above that tourism on the Western Isles relies heavily on the natural landscape. The importance of this “nature based” tourism thus raises questions about the impact that the Stornoway Wind Farm will have on the natural landscape and ultimately its impact on the level of tourism expenditure in the area. A literature review of survey evidence in relation to the impact of wind farm development on tourism has been undertaken and a summary of the findings is presented in Appendix 7C of the Socio-Economic Assessment in the ES. The conclusions suggested by these visitor surveys is that, on balance, wind farms have low to medium impacts on local tourism. The Stornoway Wind Farm will not be sited in an area deemed to be sensitive to developments e.g. Lewis Peatlands Special Protection Area, RAMSAR site and Lewis Peatlands Special Area of Conservation. Nor will the wind farm impinge on any of these protected sites.

21.9 The stakeholder consultations highlighted some local concerns in relation to the impact on tourist angling activity within the Creed River basin. The concerns related specifically
to any impact which could arise during the construction stage as well as the visual impact during its operation. The impact on angling activity is explored in more depth in the land use assessment section in Section 7.10 of the Socio-Economic Assessment of the ES.

21.10 The Stornoway to Ullapool ferry service operates twice daily and is a principal gateway for tourists arriving in the Western Isles. Continuous views of the Stornoway Wind Farm would be available for the majority of the route, where the upper portions of the proposed turbines would be clearly visible above the rising landform, forming a new focal point on the eastern seaboard of the Isle of Lewis. Overall, the landscape and visual impact assessment contained in Chapter 10 of the ES, Landscape and Visual Effects indicates that while the Stornoway Wind Farm would have a moderate visual impact, the expansive landscape and seascape context would be able to accommodate the proposed turbines, and limit any adverse effects on ferry passengers.

21.11 In terms of principal visitor attractions, the Calanais Standing Stones are located around 13km to the west of the Stornoway Wind Farm. The landscape and visual impact assessment indicates that the views of the proposed Stornoway Wind Farm would be limited to the blade tips of two turbines at most, leading to a negligible level of effect (ES Chapter 11, Historic Environment). However, more significant visual effects would be experienced by visitors to the Stornoway War Memorial, situated on the northwest edge of Stornoway (ES Chapter 10, Landscape and Visual Effects and ES Chapter 11, Historic Environment). In terms of Stornoway Wind Farm itself becoming a new tourist attraction, there will be potential for the Stornoway Trust to develop an interpretation centre at a site adjacent to the Stornoway Wind Farm, providing a visitor attraction in its own right, with potential for a shop, café, and viewing area as well as having a role in relation to the wider promotion of renewable energy and sustainability.

21.12 From the research outlined above and other evidence gathered through the EIA process as well as feedback from the consultations with local representatives of the tourism sector, it is possible to draw some key conclusions about the potential impact of the Stornoway Wind Farm on the local tourism industry. Overall, our conclusions on the potential impacts for tourism of the Stornoway Wind Farm are that while there could be some localised adverse impacts, there is unlikely to be any net impact on tourism within the Isle of Lewis and the Western Isles. This is supported by our discussions with key tourist organisations, such as VisitScotland as well as a number of other tourism related businesses and wider stakeholders.

AVIATION, DEFENCE AND TELECOMMUNICATIONS

22.1 There is no specific Chapter in the ES on this issue.

PEAT STABILITY REPORT

23.1 The Energy Consents Unit commissioned Halcrow to technically assess the Peat Stability Report(s) submitted by developers. The assessment report considers whether or not adequate and appropriate field survey, peat sampling and analytical methods have been employed to provide a sound basis for assessing peat stability and the risk of peat landslides within the development envelope. The assessment report provides a summary of findings and recommendations and the Energy Consents Unit will issue a copy to the developer in accordance with the requirements of the Best Practice Guide* (BPG) (Scottish Executive, 2006).

* “Peat Landslide Hazard and Risk Assessments – Best Practice Guide for Proposed Electricity Generation Development” (December 2006), Scottish Executive.
23.2 A peat stability assessment report has not been included in the Environmental Statement. However, peat is present across significant areas of the site and a peat probe survey undertaken for the development identifies up to 6m depth of peat. The Halcrow report provides a review of the relevant information within the Environmental Statement to confirm whether a preliminary assessment of peat landslide hazard potential has been undertaken and whether the level of assessment is appropriate for the proposed development. A recommendation is provided on whether detailed assessment is required. A summary of the Halcrow report is noted below.

23.3 It is acknowledged in the Environmental Statement that construction and operation of the wind farm will require excavation, temporary storage and reinstatement of peat deposits within the development site. Mitigation measures related to the potential impacts of the development on peat are discussed within Chapter 15 of the Environmental Statement. In order to minimise waste, maximise re-use on site and limit environmental impacts, Lewis Wind Power commissioned a Peat Management Strategy (ES Vol 3 Appendix 2B) as suggested by SEPA/SNH in the ‘responses to the scoping documents’ and this is to be commended. Opportunities are identified for reuse, and where possible restoration of peatlands within the development site. It is understood that ‘ongoing review of peat risks will take place during the construction period of the site as further detailed site investigations take place to ensure effective management’.

23.4 Detailed desk studies and peat surveys have been carried out at the proposed development site and mitigation measures related to peat are discussed within the Environmental Statement. A peat stability assessment has not been undertaken at this stage and it is stated that this approach was agreed with SEPA and the local planning authority. However, details of discussions with SEPA and the local planning authority have not been provided. The assessment criteria of the Best Practice Guidance indicate that a detailed assessment of the peat stability risk is required and this should be included within the Environmental Statement.

23.5 From the information provided in the Environmental Statement it appears that much of the data required for the detailed peat land slide hazard assessment has been collated. In our view, a peat stability hazard assessment should have been undertaken and the mitigation measures reviewed in light of the assessment.

23.6 It is recommended by the Halcrow report that a formal peat stability assessment report is produced, in accordance with the Best Practice Guidance. This should document the assessment which has been undertaken to inform the current design layout and mitigation measures. It should include peat landslide hazard zonation plans to ensure that the peat landslide risk is identified across the site, which will inform the geotechnical risk register for the development. The full Halcrow report is provided at Appendix 14 to this Report.

DISCUSSION OF PROPOSALS

24.1 The current scheme comprises forty-two wind turbines with a proposed installed capacity of 151.2MW plus associated infrastructure at a site to the west of the town of Stornoway. The consultation process has highlighted a number of outstanding concerns and objections:

OBJECTIONS

Historic Scotland

24.2 The main concern raised by Historic Scotland relates to the impact the development may have on the scheduled monument Druim Dubh stone circle. In particular it objects to the proposals in light of the effect of turbines 28 and 30 on this monument. It does however state that this could be mitigated if these are deleted from the scheme as it would make it
possible to understand the wider views from the monument and allow an appreciation of its topographical location.

**MOD**

24.3 The Objection from the Ministry of Defense is based on the interference on the weather radar at Druim-a-Starraig, Stornoway. Although it has had some discussion with the developers to commission a study on mitigation solutions, the MOD does in the meantime maintain its objection to the development. If the issue is resolved MOD further recommend that the development is lit.

**JRC on Behalf of Scottish Hydro**

24.4 Joint Radio Company Limited, on behalf of Scottish hydro has objected to this proposed development as part or all of development is within 1km/0.5km of a protected link site or path managed by the company. Although it is satisfied that turbines 18, 19 and 20 are acceptable it maintains an objection to the remainder.

**RSPB**

24.5 Despite accepting that the general area of the proposal may be suitable for a wind farm RSPB, objects to the development. This objection is based on the effect on golden eagle, red throated diver and black throated diver and white tailed eagle. Its concerns could be resolved by relocating or removing 12 to 15 turbines. In addition RSPB say that the proposal is contrary to EC and Scottish Government advice, and Development Plan policy as there is insufficient information to determine that there will be no adverse affect on the Lewis Peatlands SPA. More information is also sought to inform an Appropriate Assessment.

**NATS**

24.6 NATS En Route plc has objected to the development as it conflicts with safeguarding criteria. More specifically the turbines are predicted to have an acceptable impact to the Sandwick AGA voice communications system, it is also anticipated that there is a likelihood of a degradation of SSR performance within a shadow cast behind the turbines.

**HIAL**

24.7 HIAL objects to this proposal as the development would cause an infringement to the safeguarded areas and could have an impact on the ability of Stornoway airport to operate safely. It was also stated by HIAL that the electronic aeronautical systems at the airport could be affected, and there would be an impact on the instrument flight procedures, and the maneuvering of flights using the airport. The developers have identified the possibility of moving radar but this may have implications for previously assessed developments. The re-siting of the radar would not however alter the airport’s physical position or its other related navigation facilities. HIAL appreciates the local importance of the development but emphasises the need to reach agreement with developer before its objection could be withdrawn.

**SNH**

24.8 SNH object to the proposal with regard to likely effects on the SPA and potential cumulative collision mortality. Further analysis is sought or removal of turbines within 500m of the SPA (13 turbines).

**Significant Concerns**

**Energy Consent Unit Peat Slide assessment**

24.9 Detailed desk studies and peat surveys have been carried out but a peat slide assessment has not been undertaken by the developer. Best Practice Guidance on this
issue indicates that a detailed assessment of the peat stability risk is required and should be included in the ES. A peat stability hazard assessment should have been undertaken and mitigation measures reviewed in light of the assessment. Advice provided to the Energy Consents Unit recommends that such an assessment is carried out.

**Western Isles District Salmon Fisheries Board**

24.10 The Western Isles Fisheries Board does not object to the development but is concerned about several turbines. The Board would normally ask for a 200m separation from development to rivers and is therefore concerned about turbines 1,4,16,17 30 and 34. It recommends that these locations should be reviewed to maintain this separation distance. Although the Board supports the proposal to develop a Fisheries Monitoring plan it recommends that the surveys carried out in 2010 are repeated for 10 years and a condition be attached to any consent stating that if negative results occur mitigation measures are carried out. The Board makes several other recommendations that could be included in any planning conditions.

**SNH**

24.11 SNH conclude that the windfarm would have significant adverse landscape and visual impacts compromising the distinctiveness of Lewis as a whole. SNH do not however object on landscape/visual grounds.

**Environmental Health**

24.12 The Comhairle’s Environmental Health service requires evidence that the owners of the property Druim Dubh have a financial interest in the development and that no tenants be in the property.

**Technical Service – Waste**

24.13 Hydrological and other concerns have been raised with regard to potential impacts on the operation of the landfill site at Bennadrove.

**Technical Service – Roads**

24.14 Agreements should be reached with regard to issues affecting the road system and movement of traffic.

**ISSUES RAISED IN REPRESENTATIONS**

25.1 Concerns have also been raised over:

- The development risks destroying a major recreational facility on the Island of Lewis, namely the River Creed fishery;
- There is a risk of destroying the Salmonid populations in the River Creed;
- Lack of consultation with key stakeholders. The developers have not consulted with the Stornoway Angling Association or attempted to determine if the wind farm will have any effect on the River Creed fishery;
- The application does not consider the implications of the wind farm on the viability of the River Creed fishery;
- No consideration has been given to effects of shadow flicker or noise on anglers fishing the river creed;
- There is no evidence to suggest that wind power is a viable economic form of renewable energy;
- There effect on the environment and the local economy will be disastrous;
• The effects on the environment include, visual intrusion, noise, dust and sediment in salmon and trout water courses, bird collisions, disruption to peat, vegetation and areas of blanket bog, traffic disruption during construction, effects on tourism and lack of resources for itinerant works;

• The island does not have the infrastructure to support such a scheme.

It is considered that level of consultation and viability of wind power is not material to this application. The developer may however wish to consider the other issues raised as part of the consultation process.

POLICY CONSIDERATION

26.1 The Comhairle’s view of the project should be based primarily on the following key policy matters:

• Development Plan policy;
• Supplementary Planning Guidance;
• National Planning Guidance and national policy context.

26.2 The proposed development is largely within a ‘broad area of search’ for large scale wind farms in the Comhairle’s Large Scale Wind Energy Developments Supplementary Guidance Areas but is within an area of search which has particular sensitivity to aviation and defence radar operations.

26.3 As detailed in the Supplementary Guidance Broad Areas of Search are areas which are more likely to be acceptable, in principle, for large-scale wind energy developments.

26.4 Any further comment or assessment against the Development Plan, Supplementary Planning Guidance and National Planning policy is considered not to be appropriate at this time given the number and nature of outstanding matters which relate to this application (as is highlighted in this Report above). A number of objections and concerns exist that have not been investigated or addressed fully.

CONCLUSION

27.1 An initial conclusion can be reached having considered the detail of the application, the Comhairle’s Supplementary Guidance, consultees’ responses and representations and other relevant considerations. There is the potential for fundamental objections to the development to remain and therefore these matters require further consideration by the developer. It is concluded that the development, as currently presented cannot be assessed fully by the Comhairle as Principal Consultee, and that the following view should be submitted to Scottish Ministers:

• The area proposed for development by the Stornoway Wind farm is largely within a broad area of search for large scale wind farms in the Comhairle’s Large Scale Wind Energy Developments Supplementary Guidance and therefore, in principle, the Comhairle is supportive of large scale wind farm development in the general area;

• The developer should review and discuss all outstanding objections and concerns with the relevant consultees and bodies;

• That Scottish Ministers consider the use of a single Addendum to the energy consent application to deal with all the concerns raised as part of the consultation process;

• That Scottish Ministers should further consult Comhairle nan Eilean Siar, as Principal Consultee, on an Addendum or when objections are addressed by the developer;
That Scottish Ministers should consider discounting the Pairc Wind Farm Section 36 application from the cumulative impact assessment for Golden Eagles within the Outer Hebrides Natural Heritage Zone given that the application has not progressed within the consents process;

That all outstanding matters are dealt with as speedily as possible to allow the Comhairle, as Principal Consultee, to fully consider the proposals at the earliest opportunity;

That the Scottish Ministers note that SEPA’s consultation response was not available to the Comhairle at the time of completing the Comhairle’s Committee Report on the Stornoway Wind Farm; and

Given that certain issues require resolution and/or further investigation, there is no public interest at this point in holding a Public Local Inquiry for the Stornoway Wind Farm application.