PLANNING APPLICATION REF: 25/00061/PPPM HVDC CONVERTER STATION, ARNISH, ISLE OF LEWIS REPRESENTATIONS RECEIVED –

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377 060	Comments	supplementary representation in response to the additional environmental information re-advertised under Regulation 27 (30-day period beginning 7 August 2025). Please append this to my previous representation. I continue to object to the proposal at Macaulay Farm/Arnish on material planning grounds. The new documents (SEI No. 2) reinforce that significant environmental risks remain unresolved.
		 Key points arising from the new documents Breeding birds: The 2025 Moorland Breeding Bird Survey records red-listed species breeding in the development area (including hen harrier, curlew, cuckoo and skylark). Confirmed breeding within the site also includes meadow pipit, stonechat and greylag goose. This demonstrates the area's ecological sensitivity. Water & drainage capacity: Scottish Water issues no objection, but explicitly states this does not confirm the development can currently be serviced. Capacity for water and wastewater is not confirmed, capacity cannot be reserved until after any planning consent, surface water will not be accepted to the combined sewer, and there may be conflicts with existing assets. This indicates servicing risks and potential reliance on off-site upgrades not before the committee. Peat/carbon-rich soils: The SEI reissues peat probing and NVC data and notes layout updates; however, the applicant states "none of the conclusions have changed." Peat disturbance, carbon loss risk and permanent habitat loss therefore remain significant concerns. Landscape/visual & cumulative effects: Additional visualisations and cumulative assessment have been provided, yet again the applicant confirms conclusions are unchanged, implying that the significant landscape/visual effects persist. Given the above, my objection stands and is strengthened by the SEI. I urge Comhairle nan Eilean Siar to reject this application and insist on a full-scale review of the industrialisation of this area, with proper environmental scrutiny.
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09 OBJ	Additional Comments	Please confirm receipt and attach this to my earlier representation. I am writing to object to application 25/00061/PPPM and to the additional environmental information now submitted and re-advertised under Regulation 27. I submit this within the 30-day period beginning 7 August 2025.
		I am writing to formally object to the proposed High Voltage Direct Current (HVDC) converter station approximately 2km to the southwest of Stornoway in the vicinity of Macaulay Farm. This objection is based on material planning considerations, including environmental destruction, failure to comply with planning policy, severe impact on local amenity, and major infrastructure concerns.
		The proposed development, covering 285 hectares—an area equivalent to the size of Stornoway or 399 football pitches—is grossly disproportionate and represents an unacceptable level of industrialisation in this rural and environmentally sensitive area.
		Our Island Home will suffer immeasurable damage in the long term for short term gain. This development is not welcome.

1. Environmental Impact

The proposed converter station and its associated infrastructure, including wind farms, pylons, and substations, pose a significant threat to the local environment,

particularly through: mitigating climate change by storing vast amounts of carbon. The excavation, drainage, and construction required for this project would lead to permanent damage to peatland ecosystems, releasing stored carbon and undermining Scotland's climate targets and biodiversity commitments.

This contradicts:

- The Scottish Government's Peatland Action Plan, which aims to protect and restore peatlands.
- The Climate Change (Scotland) Act 2019, which commits to netzero emissions by 2045.
- b) Disruption to Protected Wildlife

The proposed site is home to Red List bird species—species of high conservation concern that are already experiencing significant declines. Large-scale development, along with increased noise, artificial lighting, and habitat disturbance, will have irreversible negative impacts on these species.

The destruction of habitats and increased human activity will disturb nesting and breeding patterns, affecting bird species such as:

- Golden Eagle (Aquila chrysaetos)
- Merlin (Falco columbarius)
- Red-throated Diver (Gavia stellata)

The UK Nature Conservation (Scotland) Act 2004 requires authorities to safeguard biodiversity—this proposal clearly contradicts this obligation.

- 2. Severe Impact on Amenity
- a) Noise and Light Pollution
- A HVDC converter station of this magnitude will generate a continuous low-frequency hum, which is known to cause sleep disturbances, stress, and reduced quality of life for residents.
- 24-hour security and operational lighting will result in significant light pollution, disrupting the dark skies of the Outer Hebrides, an important feature of the region's natural heritage.
- b) Visual Impact
- The proposed converter station is an industrial structure, entirely out of character with its rural surroundings.
- Given the lack of natural screening, the facility will be highly visible from multiple viewpoints, permanently altering the landscape.
- The cumulative impact of the converter station plus associated wind farms and infrastructure will further degrade the natural beauty of the area.
- 3. Infrastructure & Road Safety Concerns
- a) Increased Traffic and Road Safety Risks

The construction phase will result in a major increase in heavy goods vehicle

(HGV) traffic, which will:

- Damage rural roads, which are not built to withstand industrial transport.
- Increase the risk of accidents for pedestrians, cyclists, and other road users.
- Cause congestion on key routes, particularly in and around Stornoway.

There is no clear mitigation strategy for these impacts, making the proposal irresponsible and unviable.

- b) Strain on Local Services
- Emergency services, drainage, and waste management systems may struggle to cope with the demands of this facility.
- The Stornoway area has limited infrastructure to support such an industrial project, yet there has been no clear assessment of how local services will be affected.
- 4. Planning Policy Violations & 'Salami Slicing' of Developments a) Inadequate Consideration of Cumulative Impact

This application fails to acknowledge the larger industrialisation plan for this area. The converter station is only one part of a wider network of developments,

including:

- Stornoway Wind Farm (EDF/ESB) 33 turbines, up to 180m in height
- Proposed substations for the N3 Talisk and N4 Spiorad na Mara wind farms
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Each project is being considered individually, which artificially reduces their perceived impact. This is a clear example of 'salami slicing', where a large development is broken into smaller applications to avoid proper scrutiny.

This approach contradicts both national and local planning policies, including:

- Scottish Planning Policy (SPP), which states that "cumulative impacts must be fully assessed before determining major infrastructure projects."
- Comhairle nan Eilean Siar Local Development Plan, which seeks to protect natural and cultural heritage from inappropriate development.
- b) Failure to Conduct a Comprehensive Environmental Impact Assessment

(EIA)

Despite the massive scale of this proposal and its interconnection with multiple other industrial projects, a comprehensive EIA has not been completed.

- An EIA must be undertaken that considers the combined impact of this converter station and all associated developments before any decision is made.
- Failure to do so would represent a significant procedural flaw, which could lead to legal challenges against the project.

Conclusion

This proposal is fundamentally flawed and must be rejected on the basis of:

- 1. Irreversible damage to peatlands, undermining Scotland's climate and biodiversity commitments.
- 2. Severe disruption to wildlife, including protected Red List species.
- 3. Significant loss of residential amenity, due to noise, light pollution, and visual impact.
- 4. Major infrastructure concerns, including road safety risks and strain on local services.
- 5. Failure to properly assess the cumulative impact, violating planning policy.
- 6. Lack of a full Environmental Impact Assessment, making the

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		application incomplete and unreliable.
		I urge Comhairle nan Eilean Siar to reject this application and insist on a full-scale review of the industrialisation of this area, with proper environmental scrutiny.
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In summary this application is still in direct opposition to the biodiversity, natural places, soils, etc policies set out in the NPF4, Scotland's national spatial strategy. This by default makes the scheme non-viable, especially with these new documents added that show more harm will be done to the flora and fauna, with no justification or suitable mitigation measures outlined. It directly opposes the existing governmental framework and thus should be rejected.

Policy 3 all parts, Policy 4 all parts, Policy 5 the list goes on. "Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported." The supplementary documents have also still not addressed the fire risk issues this application poses either - a huge disaster for the island, especially with increased drought and climate change. This will not improve the islands' resilience to climate change and is therefore in direct opposotion to Scottish planning policy.

Key points arising from the new documents

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under Regulation 27. I submit this within the 30-day period beginning

7 August 2025.

I am writing to formally object to the proposed High Voltage Direct Current (HVDC) converter station approximately 2km to the southwest of Stornoway in the vicinity of Macaulay Farm. This objection is based on material planning considerations, including environmental destruction, failure to comply with planning policy, severe impact on local amenity, and major infrastructure concerns.

The proposed development, covering 285 hectares—an area equivalent to the size of Stornoway or 399 football pitches—is grossly disproportionate and represents an unacceptable level of industrialisation in this rural and environmentally sensitive area.

It's very clear to see the lack of concern with this project for the environment/people living on the Island or it wouldn't have been caught out by outside bodies, it really shows the lack of respect to everyone and our intelligence, this will continue throughout the entire project causing irreversible damage to the Island and it's environment and we will be powerless against it. I am an Islander and have great concerns for my family home and the future of it, we need to bring more families onto the Islands and not give reasons to leave, who would want to live alongside such destructive industries that will continue to spread.

1. Environmental Impact

The proposed converter station and its associated infrastructure, including wind farms, pylons, and substations, pose a significant threat to the local environment, particularly through: mitigating climate change by storing vast amounts of carbon. The excavation, drainage, and construction required for this project would lead to permanent damage to peatland ecosystems, releasing stored carbon and undermining Scotland's climate targets and biodiversity commitments. This contradicts:

- The Scottish Government's Peatland Action Plan, which aims to protect and restore peatlands.
- The Climate Change (Scotland) Act 2019, which commits to netzero emissions by 2045.
- b) Disruption to Protected Wildlife

The proposed site is home to Red List bird species—species of high conservation concern that are already experiencing significant declines. Large-scale development, along with increased noise, artificial lighting, and habitat disturbance, will have irreversible negative impacts on these species.

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- 24-hour security and operational lighting will result in significant light pollution, disrupting the dark skies of the Outer Hebrides, an important feature of the region's natural heritage.
- b) Visual Impact

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- Given the lack of natural screening, the facility will be highly visible from multiple viewpoints, permanently altering the landscape.
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- 3. Infrastructure & Road Safety Concerns
- a) Increased Traffic and Road Safety Risks The construction phase will result in a major increase in heavy goods vehicle (HGV) traffic, which will:
- Damage rural roads, which are not built to withstand industrial transport.
- Increase the risk of accidents for pedestrians, cyclists, and other road users.
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There is no clear mitigation strategy for these impacts, making the proposal irresponsible and unviable.

- b) Strain on Local Services
- Emergency services, drainage, and waste management systems may struggle to cope with the demands of this facility.
- The Stornoway area has limited infrastructure to support such an industrial project, yet there has been no clear assessment of how local services will be affected.
- 4. Planning Policy Violations & 'Salami Slicing' of Developments a) Inadequate Consideration of Cumulative Impact This application fails to acknowledge the larger industrialisation plan for this area. The converter station is only one part of a wider network of developments, including:
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The proposed development, covering 285 hectares—an area equivalent to the size of Stornoway or 399 football pitches—is grossly disproportionate and represents an unacceptable level of industrialisation in this rural and environmentally sensitive area.

The damage to our wild life and our environment is extremely concerning, Disturbing peatlands releases stored carbon, contributing to climate change and negatively impacting biodiversity and water quality. Healthy peatlands act as carbon sinks, but when disturbed, they can become significant sources of greenhouse gas emissions.

The wind turbines, damage to our sea life, sea beds, I sat the other day at a beach on the west side and watched so many dolphins

jumping, I've seen the salmon as they make their seasonal journeys on other occasions, I've seen eagles all in the area you want to destroy. I have also walked up grimshader to find an eagle sliced by the blade of the wind turbines there, it was reported.

Sound pollution too, in the sea and above is a worry,

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