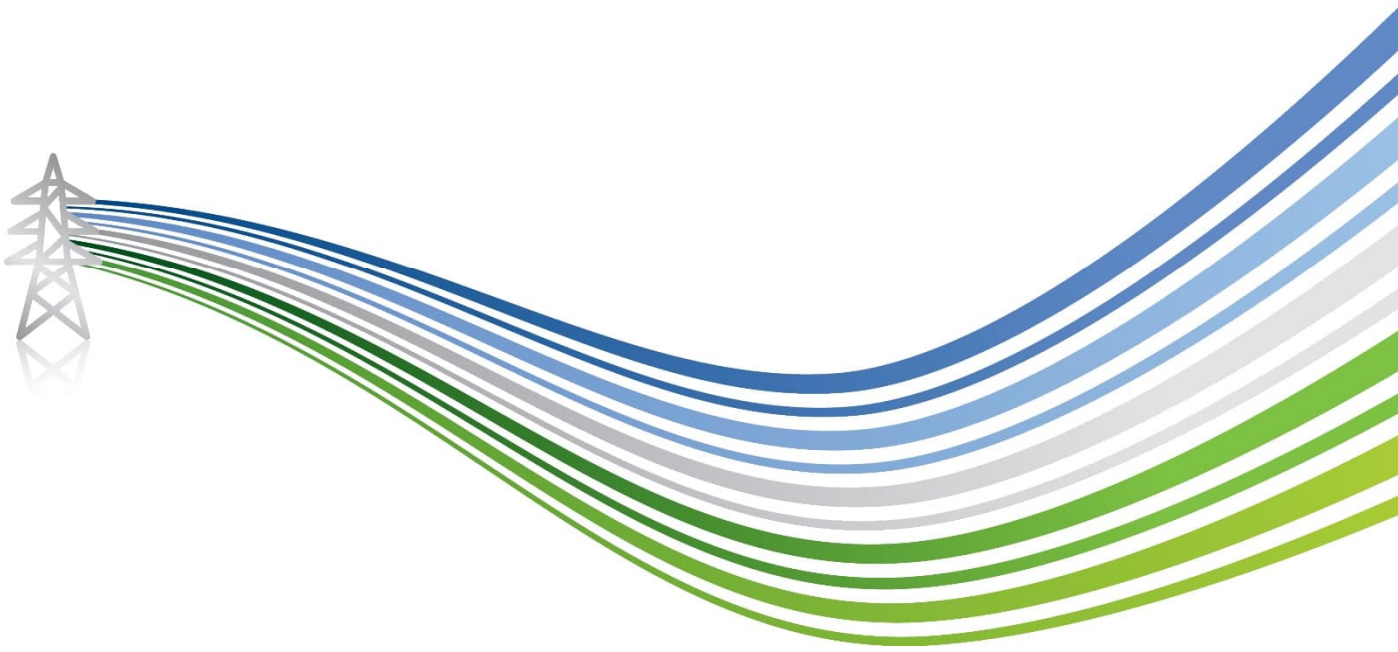
LT14 Lewis Substation and Converter Hub

Planning Statement

March 2025



Scottish & Southern Electricity Networks

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1. INTRODUCTION

1.1 Background

1.1.1 Scottish Hydro Electric (SHE) Transmission plc who, operating and known as Scottish and Southern Electricity Networks Transmission ("SSEN Transmission"), owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands. SSEN Transmission ("the Applicant") holds a license under Section 9 the Electricity Act 1989 to "*develop and maintain an efficient, co-ordinated and economical electricity transmission system in its licensed area*".[1]

1.1.2 This Planning Statement supports the Applicant's application for Planning Permission in Principle to Comhairle nan Eilean Siar ('CnES') under the Town and Country Planning (Scotland) Act 1997 (as amended)[2] ("the 1997 Act")for permission to construct and operate a new strategic transmission hub ('the Proposed Development')on land located approximately 2 km southwest of Stornoway on the Isle of Lewis ("the Site"). The location of the Site is shown in Figure 1. The key components of the Proposed Development would be:

1.1.3 High Voltage Direct Current ('HVDC') Converter Station;

1.1.4 132kV and 400 kV Substation;

1.1.5 Ancillary works, including construction of temporary and permanent access, establishment of new junctions from the A859 and the minor Arnish road, vegetation clearance, rock extraction and reinstatement and restoration of peat.

1.1.6 The Proposed Development is part of SSEN Transmission's Pathway to 2030 projects[3]. These projects are part of a proposed major upgrade of the electricity transmission network across the United Kingdom (UK) to help deliver the UK and Scottish Governments' climate change and energy security targets. These projects would connect UK based low carbon renewable electricity generation to areas of demand across the country, with the aim of building a cleaner, more secure, and affordable energy system for homes and businesses across the UK. The Proposed Development would therefore play a role in providing Scotland and the rest of the UK with low carbon renewable energy and assist in providing more secure and affordable energy systems.

1.1.7 The Proposed Development is classed as a National Development under section 3A of the 1997 Act. In terms of National Planning Framework 4 ('NPF4'), the Proposed Development is classified both as National Development Type 1: Energy Innovation Development on the Islands: Outer Hebrides, Supporting the Arnish Renewables Base and Outer Hebrides Energy Hub, and National Development Type 3: Strategic Renewable Energy Generation and Transmission Infrastructure.[4]

1.2 Scope of Planning Statement

1.2.1 This Planning Statement is submitted by the Applicant in support of their planning application to CnES. The scope of this planning assessment is limited to the Proposed Development. It would not have a fixed operational life (although this is expected to be roughly 40 years), and once established, the Site would become the operational land of a statutory undertaker in terms of Section 215 of the 1997 Act. As such, the planning permission sought is for permanent development.

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[1] Electricity Act 1989. At: https://www.legislation.gov.uk/ukpga/1989/29/contents (accessed 18/02/2025)

2 Scottish Government (1997). Town and Country Planning (Scotland) Act 1997. At: https://www.legislation.gov.uk/ukpga/1997/8/contents (accessed 18/02/2025)

3 Further details on the Pathway to 2030 projects is provided at https://www.nationalgrideso.com/futureenergy/pathway-2030-holistic-network-design

[4] National Planning Framework 4 (2024). At: https://www.gov.scot/publications/national-planning-framework-4/ (accessed 18/02/2025)

1.2.2 This Planning Statement outlines the case for approval in land use planning policy terms at the national, and local level (as defined in Section 2.2 and 2.3 below). It also assesses the Proposed Development in the context of Energy Policy, with particular emphasis on the position in support of the delivering electricity infrastructure. The Proposed Development would also assist in the delivery of both the UK and Scottish Government's legally binding net zero commitments and forming an integral part of in facilitating the Western Isles Link, as one of SSEN Transmission's Pathway to 2030 projects.

1.2.3 This Planning Statement will assess the Proposed Development against the relevant policies, guidance, and other material considerations. In doing so, it details policy synergies and tensions for the project in relation to local and national planning policy, and relevant energy policies. It also provides an account of the proposed mitigating measures adopted in accordance with these policies. It will then provide an overarching 'balancing' analysis of the Proposed Development in the context of site specific and general development policies in Section 4.2. The Planning Statement also assesses the planning implications of the Proposed Development to assist in the decision-making process. Assessment of Planning Policy in relation to the relevant environmental constraints is provided in Section 4.2 of this Planning Statement.

1.2.4 The Proposed Development is not of a type listed within Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 ('the EIA Regulations') and it is not directly identified within Schedule 2 of the EIA Regulations. However, given the scale and nature of the Proposed Development the Applicant decided to undertake an environmental impact assessment. A Scoping Report was submitted to CnES on 29 August 2024, under application reference 24/00325/SCO[5]. CnES issued its Scoping Opinion on 26 November 2024.

1.3 Proposed Development

1.3.1 The Site, on land approximately 2 km southwest of Stornoway on the Isle of Lewis ("the site") and covers an area of approximately 285 hectares (ha). The Proposed Development would comprise a new HVDC Converter station and associated 132 kV and 400 kV AC substation. The components of the Proposed Development are outlined below in sections 1.3.2 - 1.3.8.

The HVDC Converter Station

1.3.2 An HVDC converter station is required to enable a proposed 2 GW HVDC link from Arnish Point, Isle of Lewis to Loch Broom on the Scottish mainland. This would enable the efficient high volume power transmission from generators on and around Lewis to the mainland transmission network, acting as a significant advancement in the capability of Lewis to provide and exchange energy with the mainland network and in supporting renewable energy projects.

1.3.3 The HVDC converter station is composed of a series of buildings enclosing all apparatus and providing office, welfare, and spare storage. The HVDC Converter station would have an overall platform footprint of around approximately 320m by 310m and a maximum height of 27.5 m and is likely to consist of the following:

- the two main converter buildings housing transformers, converters, dynamic brake system and DC hall.
- service and control building between the converter's buildings.
- two AC Hall and Filter Equipment buildings.
- a number of smaller auxiliary buildings (diesel generator, spares building, etc).

5 Comhairle nan Eilean Siar (2024) EIA Scoping Opinions, Lewis Hub, Substation and Convertor Station. At: https://www.cne-siar.gov.uk/planning-and-building-standards/planning/planning-applications/view-planning-applications/national-major-andor-eia-development-applications/determining-authority/lewis-hub-substation-and-convertor-station (accessed 18/02/2025)

132 kV and 400 kV Substation

1.3.4 The 132/400 kV substation will have an overall platform footprint of around 260m by 250m and is likely to comprise two three 132/400 kV Super Grid Transformer (SGTs), indoor Gas-Insulated high-voltage Switchgear (GIS) and associated air insulated isolators/earth switches. The SGTs will each have an overall footprint of around 45m by 78m and a maximum height of 27.5m. They will be enclosed to protect from the weather and reduce the noise impact and will consist of:

- 400 kV GIS substation building and associated control building.
- 132 kV GIS substation building and associated control building; and
- Three transformer buildings.

Ancillary Works

1.3.5 Ancillary works would be required to facilitate construction and operation of the Proposed Development and are likely to include:

- Two permanent access tracks, one connecting to the A859 road and one connecting to the road leading from the Arnish Road;
- Upgrade existing or establishment of new junction bellmouths;
- Temporary access tracks;
- Two temporary construction compounds and laydown areas;
- A landscape bund;
- The diversion and/or culverting of an unnamed watercourse (a tributary of the River Creed);
- Extraction of rock from borrow pits or quarries;
- A peat restoration area; and,
- Drainage, including three attenuation basins (SUDS ponds).

1.3.6 The final design of the Proposed Development will be determined based on the environmental assessments, technical, engineering and cost analysis and the undertaken stakeholder consultation and any imposed planning requirements.

Transmission / Distribution Line Connections

1.3.7 Connections will be required from the Proposed Development to the existing electricity transmission network on Lewis, as well as to the consented landfall point at Arnish Point. The connections to the existing network would comprise overhead wood pole lines carrying voltages of up to 132 kV, as well as connections of lower voltages (33 kV, placed underground). These connection projects would be the subject of separate applications under the Electricity Act 1989 when they have been developed to a sufficient stage.

1.3.8 The HVDC cable connection to the consented landfall point (Arnish Point) would also be placed underground. Underground cables are Permitted Development in accordance by virtue of Schedule 1, Part 13, Class 40 (1) a) of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended).

1.4 Site Location and Description

Figure 1: The Site (encompassed by the red line boundary).

1.4.1 The Proposed Development is situated on Arnish Moor, an area of rough peatland approximately 1.7km southwest of Stornoway, adjacent to the Eastern side of the A859. The site is owned by the Stornoway Trust and Macaulay Farm on Arnish Moor.

1.4.2 The Proposed Development lies 2.1km northwest of the Arnish Point landfall site (Arnish HVDC Converter Station and GIS Substation), and approximately 350m south of the existing Stornoway substation which is owned and operated by The Applicant.

1.4.3 The site is not within any cultural/historical or environmental designations. The proposed substation position is 250m southwest of the southern extent of Lews Castle and Lady Lever Park (GDL00263) designated gardens/designed landscape.

1.4.4 A key landscape characteristic of the Site is that it includes Class 1 Peatland, which requires careful mitigation to minimise damage during the construction, operation and decommissioning of the Proposed Development. This is addressed further in Section 4.2 of this Planning Statement under *Assessment of Effects, hydrology, Hydrogeology, Geology and Soils.*

1.4.5 Another important factor is the requirement for clearing of low-lying woodland and shrubbery and associated need for additional visual impact mitigation. This is addressed further in Section 4.2 of this Planning Statement under *Assessment of Effects, Landscape & Visual.*

1.5 Need for Development

1.5.1 The project is an integral element of the Western Isles HVDC Link project ("the Link") which is a new electricity transmission link with 1.8GW capacity. The Link will connect existing and future renewable (wind) generation from the Western Isles to mainland Scotland and the wider UK via subsea cabling. The Proposed Development will introduce an HVDC converter station, which acts to convert power from Alternating Current ("AC") to Direct Current ("DC") for onward transmission. The Proposed Development will serve a key role in connecting the Outer Hebrides electricity distribution network to the mainland transmission network via the Arnish Point HVDC landfall.

1.5.2 The role of the Western Isles in terms of growing Scotland/UK renewable energy generation capacity (specifically wind in the context of Lewis and the broader Western Isles) requires upgrades to the existing transmission infrastructure. The Link will improve security of supply to the mainland and will reduce reliance on existing non-renewable energy sources and global wholesale energy markets. The Proposed Development is an essential component needed to enable the transmission of power generated through current and future onshore and offshore windfarms in the Western Isles.

1.5.3 The linking of Outer Hebrides generation to the mainland transmission network forms part of the wider £20bn investment programme 'Pathway to 2030' which aims to deliver 2030 Government targets and the transition to net zero through including through upgrades to the Scottish transmission network. The Scottish Government target to deliver an additional 20 GW of renewable electricity capacity by 2030.

1.5.4 The upgrading of the transmission infrastructure will facilitate connections to the transmission network for consented and proposed renewable energy generation projects in line with the applicant's licence obligations.

1.6 Consideration of Alternatives

1.6.1 The proposed site was selected following a reassessment of site options taking account of community and landowner feedback. This decision was made to minimise community and landscape impacts throughout both the development and operation of the project, seeking to balance environmental, technical and construction constraints.

1.6.2 The Applicant carried out a typical three-stage site selection process which was comprised of the following:

- Pre-site selection activities: internal assessments were used to determine the type and scope of the development, taking account of the required size and general locational requirements of the Proposed Development. The Proposed Development size was dictated by the required components of the Proposed Development (see paragraphs 1.3.1-1.3.4 of this Planning Statement).
- Initial site screening: proposed sites were screened in terms of technical feasibility, economic viability, and environmental impact (EIA screening report). The search area was determined by terrain, existing infrastructure, Local Development Plan (LDP) designations and features, and existing connection options. At this stage several sites were identified to undergo initial suitability assessments.
- Detailed site selection: The preferred site for the Proposed Development was determined according to final selection criteria: avoiding physical, environmental, and social disruption where possible; acceptability to stakeholders; economic viability; and engineering and connection requirements.

1.6.3 A Red Amber Green (RAG) risk assessment was used, scoring for technical, environmental, and economic aspects using colour-coded criteria to carry out a comparative appraisal of site options identified in 1.6.1 (stages 1-2). 'Green' coded constraints were seen as acceptable, whereas 'red' coded constraints were preventative in site selection. The RAG criteria were as follows:

- Red: High potential for the development to be constrained
- Amber: Intermediate potential for the development to be constrained
- Green: Low potential for the development to be constrained

1.6.4 An early site optioneering process was carried out on the basis of an initial 600MW capacity (0.6GW). The capacity of the Link project was later tripled to the current 1.8GW. As a result, search criteria were revised to accommodate new site requirements.

1.6.5 The five potential sites identified at Stage 1 with two sites being discounted, including the originally proposed location for the link at Arnish Point, due to size constraints at that location. The Marybank site was identified after stage 2 optioneering, and site-specific risks were thus identified. Following the completion of Stage 1, a short list of three site options was taken forward for further assessment at Stage 2. To address consultation feedback and in conjunction with the Site Selection Guidance, a further three site options were identified for analysis at Stage 2, including the Site which was identified as the preferred site having regard to technical, environmental and cost factors.

1.6.6 The site selection process has been carefully considered, and the Proposed Development aims to minimise environmental impacts such as landscape and visual impact, biodiversity impact and peatland impact in as far as is reasonably practicable. Where impacts cannot be avoided, a suite of mitigation measures is outlined to minimise environmental impacts. These proposed mitigation measures are outlined in Section 4 of this Planning Statement titled *Environmental Constraints and Assessment* and are detailed in the supporting Environmental Impact Assessment Report (EIAR) and the Outline Peat Management Plan (OPMP) and Construction Environment Management Plan (CEMP).

2. ENVIRONMENTAL CONSTRAINTS AND ASSESSMENT

2.1 Introduction to Environmental Constraints

2.1.1 An EIA has been undertaken for the Proposed Development in accordance with the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 ('EIA Regulations') to assess the likely significant effects of the Proposed Development. While the Proposed Development does not fall under the categories of Schedule 1 and is not directly identified within Schedule 2 of the EIA Regulations, the Applicant decided to undertake an EIA for the Proposed Development given the Proposed Development's scale and nature.

2.1.2 Key sensitivities within the vicinity of the Site include visual impact of the Proposed Development on the local landscape character and cultural heritage, as well as various impacts on the sensitive peatland ecology of the site in terms of ecological impact on bog habitat, peat damage and drainage risks.

2.1.3 The following designated sites are within 5 km of the Proposed Development:

- Lews Castle And Lady Lever Park Garden and Designed Landscape
- Stornoway Conservation area
- 80 listed buildings (three of which are Category As)

2.1.4 A Scoping Exercise was undertaken considering potential sensitive receptors and the nature of the construction and operation of the Proposed Development. A report of this exercise was provided in the Scoping Report prepared on 29 August 2024. A formal request for an EIA Scoping Opinion under the EIA Regulations was issued to CnES on 29 August 2024 accompanied by the Scoping Report. The Scoping Response advised on topics to be 'Scoped in' to the EIA and identified any sensitivities not included in the Scoping Report, which was derived from the joint representations of CnES and relevant stakeholders of each topic area (reference 24/00325/SCO).

2.1.5 Resulting from the Scoping Exercise described above, 'Scoped in' topics were brought forward to be addressed in the EIA. These were:

- Landscape and Visual impacts on specific visual receptors recommended in the scoping response.
- Ecological and Nature Conservation impacts on the specific ecosystems affected by construction and operation of the Proposed Development.
- Ornithological impacts and habitat loss risks for specific species occurring during construction and operation of the Proposed Development.
- Cultural Heritage impacts on specific sites within an agreed vicinity.
- Hydrological, Hydrogeological, and Geological/Soils impacts within the Site, specifically in relation to the Class 1 peatland soils and local watercourses.
- Traffic and Transport impacts in relation to construction traffic on local roads.
- Noise sensitive receptors in the local area.

2.1.6 Additionally, a review of several issues which were 'Scoped out' was recommended in the Scoping Response including cumulative effects on local population and human health, climate change impacts of construction and operational phases, and tourism and recreation amenity impact for the vicinity of the Proposed Development. These topics are thus addressed by the EIA in addition to those 'Scoped in'.

2.1.7 A summary of the key environmental considerations by topic is assessed below against policies from both the OHLDP and NPF4. NPF4 policies are assessed and balanced with OHLDP policies as appropriate.

2.1.8 Cumulative effects and associated mitigation measures are discussed separately at the end of this section (Section 4.3 of this Planning Statement).

2.2 Assessment of Effects

Landscape & Visual

2.2.1 Chapter 5 of the EIAR assesses the likely landscape and visual effects of the Proposed Development on the landscape receptors and visual amenity of the local area. A LVIA was completed in late 2024 is outlined in this chapter.

2.2.2 The area studies consisted of a 10km radius beyond the Proposed Development. A wider area of 25km radius was considered with respect to the South Lewis, Harris and North Uist National Scenic Area (NSA); Wild Land Area 30 Harris – Uig Hills (WLA 30); and Wild Land Area 31 Eishken (WLA 31). A desk study was carried out followed by field work in December 2022, March and November 2023, and March and September 2024.

2.2.3 Several landscape receptors were 'Scoped in' to the LVIA including several NatureScot Landscape Character Types (LCTs) in the vicinity; roads; viewpoints, and other travel routes such as ferry routes and walking routes. Both Wild Land Areas (WLAs) and National Scenic Areas (NSA) were scoped out of the assessment due to limited or no theoretical visibility.

2.2.4 The LVIA concluded that there would be significant adverse effects during construction for people who may be present:

- Within LCT 322 Boggy Moorland;
- Within Lews Castle and Lady Lever Park G&DL;
- At building-based receptors B6 A859 The Arena, B3 Lower Sandwick and B4 Olivers Brae/Cemetery;
- At recreation-based receptors Rec 4 Below Cnoc na Croic Rec 7 Marybank picnic benches, Rec 1 Lewis War Memorial, Rec 2 Lolaire Memorial Car Park and Rec 3 Rhubba Airnis; and
- - Travelling on route-based receptors R3 A859 north and south-bound

2.2.5 Mitigation measures during the construction phase are earthworks for screening purposes (including bunding, retaining wall, and earth mounding), and planting of native trees and shrubs to increase the effectiveness of screen bunding and visually reinforce existing woodland near Lews Castle grounds. All mitigation measures are incorporated at the construction stage and will remain in place for the operational lifetime of the Proposed Development, and as such there are no operational phase mitigation measures.

2.2.6 With regards to the significant operational effects of the Proposed Development, it was found that one LCT was assessed as accruing significant effects during operation with Lews Castle and Lady Lever Park G&DL was assessed as accruing moderate indirect significant effects during operation. Of the six-building based visual receptors, one (B3 Lower Sandwick) was assessed as having moderate-major significant effects during operation and one (Olivers Brae/Cemetery Entrance was assessed as accruing moderate significant effects during operation

Ecology and Nature Conservation

2.2.7 Chapter 7 of the EIAR reports on the likely significant effects with respect to ecological features associated with the construction, operation and decommissioning of the Proposed Development. The Chapter covers effects on designation nature conservation sites, sensitive habitats, and protected species. NPF4 Policies 3, 4,5 and 6 are key to the assessment outcomes in terms of planning policy. Policy 4 recognises the importance of establishing effects and impacts and designing appropriate mitigation such that the integrity of designations and habitats is protected and notes that proposals will not be supported where significant adverse effects are identified.

2.2.8 In this regard, it is also noted that on the 27th of November 2024[6] the Scottish Government published the Scottish Biodiversity Strategy to 2045. The strategy sets a clear goal for Scotland to be Nature Positive by 2030 and to have restored and regenerated biodiversity across the country by 2045. This comprehensive approach aims to halt nature loss and make substantial progress in restoring nature, ensuring a thriving environment for both wildlife and communities.

2.2.9 A desk study was carried out, comprising a desk Study Area with a 2km buffer around the Proposed Development. This established that there were no statutory designated nature conservation sites, nor non-statutory designated nature conservation sites, within the desk Study area. The desk study was followed by two field surveys undertaken by Ramboll ecologists in January and August 2023, encompassing a 250m buffer around the Proposed Development. Field surveys included UK Habitat Classification Survey, Groundwater Dependent Terrestrial Ecosystems (GWDTE) survey, aquatic surveys, as well as a survey for protected and notable species.

2.2.10 Sensitive receptors 'Scoped out' of the EIAR include a range of habitats including grassland and woodland, which were deemed to be of only local importance. Species such as reptiles, amphibians, terrestrial invertebrates and otter were also 'Scoped out' as the impact and mitigation measures of the Proposed Development were sufficient for these to not be considered further.

2.2.11 Sensitive receptors 'Scoped in' to the EIAR include blanket bog, upland heathland, oligotrophic and dystrophic lakes, and the River Creed. Potential effects are separated into construction and operation phases and summarised below (paras 2.4.9-2.4.11).

Construction Phase Effects

2.2.12 Habitat loss, both temporary and permanent, are expected to affect blanket bog and upland heathland leading to adverse effects. Blanket bog is regarded as nationally important as an Annex 1 Habitat, and the permanent habitat loss identified here is considered low magnitude thereby not significant. Similarly, permanent habitat loss of Annex 1 regionally important upland heathland is considered not significant due to its low magnitude. Temporary habitat losses experienced during the construction phase are short term and reversible, thus not significant. Any further loss or degradation of these habitats is considered not significant. Additional risks for pollution events on standing and running water receptors such as the mentioned lakes and the River Creed are predicted to be very unlikely, low magnitude and reversible, and are thus predicted to be not significant.

2.2.13 Mitigation of the risks faced during the construction phase would be managed by a suite of measures, (detailed in sections 7.7.2 – 7.7.13, EIAR). The Outline Habitat Management Plan (OHMP) (Technical Appendix 7.4, EIAR) would be followed to ensure proper peatland habitat restoration is achieved (further detail on peatland restoration can be found under Hydrology, Hydrogeology, Geology and Soils). All mitigation measures are underpinned by the 10% BNG requirement set by the Applicant, and thus will be carried out in accordance to this requirement. A CEMP would be followed in adherence to Technical Appendix 2.2: SSEN General Environmental Management Plan and Technical Appendix 2.3: SSEN Species Protection Plan (EIAR) to ensure all mitigation measures are followed. Lastly, pre-construction species surveys would be carried out within 3 months of the start of works to ensure any further protected species are accounted for. Construction phase ecological risk mitigation would also be designed into the siting and layout of the Proposed Development which acts to minimise impacts on the most sensitive receptors as far as possible.

Operation Phase Effects

2.2.14 Monthly maintenance checks and visits may result in the disturbance of habitats on the Site. Over the 40-year operational lifetime of the Proposed Development, these impacts are low magnitude, short-term, temporary and are considered not significant. As such, no mitigation measures are proposed.

[6] Scottish Government. (2024). Scottish Biodiversity Strategy to 2045. Available at: https://www.gov.scot/publications/scottish-biodiversity-strategy-2045/.

Ornithology

2.2.15 Chapter 8 of the EIAR outlines the likely significant effects with respect to ornithology associated with the construction, operation and decommissioning of the Proposed Development. The chapter covers any significant effects anticipated on protected sites designated for ornithological species, and bird species and populations in and around the Proposed Development at all times of year.

2.2.16 A desk study was carried out for an area up to 10km from the site boundary for features of international importance, and 2km for those of national importance. Subsequent field studies were undertaken between March 2023 and February 2025. These included flight activity surveys and moorland bird surveys, with additional Breeding Raptor Data being sourced from the Lewis and Harris Raptor Study Group (LHRSG).

2.2.17 Sensitive receptors established include designated sites of which two of international and national importance were identified within 10 km of the Site (Lewis Peatlands SPA and Tong Saltings SSSI). Sensitive species identified were golden eagle, white-tailed eagle, merlin and hen harrier; herring gull, great black-backed gull and whooper swan; black-throated diver and red-throated diver; and lastly arctic skua and great skua. Likely effects 'Scoped in' to the ornithological assessment are:

- Potential disturbance of hen harrier territories and confirmed nesting locations (the Site);
- Disturbance or nest destruction of great skua (Red listed) breeding territories and nesting locations (Peat Restoration Area); and
- Disturbance or nest destruction of great black-backed gull and herring gull (Red listed species) breeding territories and confirmed nesting locations (Peat Restoration Area).

2.2.18 During the construction phase, hen harrier nest disturbance was identified as an effect of significant impact, and non-Schedule 1 birds' nest destruction, while not significant in EIA terms, requires mitigation measures as stipulated by the Wildlife and Countryside Act 1981. All other potential effects were determined as not significant. No significant operational effects were identified.

2.2.19 Proposed mitigation measures for the above impacts follow the mitigation hierarchy of avoidance, mitigation, compensation and enhancement. Site selection was carried out to avoid sensitive receptors such as designated sites and golden eagle territories. Further mitigation measures are embedded in the GEMPs and SPPs. Additional mitigation will be captured and delivered through the CEMP.

2.2.20 To mitigate the disturbance of hen harrier, surveys would be conducted in the year preceding works and continuing throughout the construction phase. Any nests identified within the Site would be incorporated into the Bird SPP by way of a works exclusion zone established around the nest site, which is to be maintained until nesting/fledging is completed. Active nests have been identified within 750m of works, and these must be confirmed during the breeding bird season (March to September) by additional nest surveys and would then require a watching brief from an ornithologist to mitigate disturbance during construction works. For non-Schedule 1 bird species, the destruction or disturbance of nests during the breeding bird season which may arise from vegetation clearance, peat excavation and other groundworks associated with the construction of the Proposed Development would be mitigated by pre-construction surveys for such nesting birds.

2.2.21 Overall, with the proposed mitigation measures in place no significant residual effects on ornithological features are predicted.

Cultural Heritage

2.2.22 Chapter 6 of the EIAR outlines the likely significant effects with respect to cultural heritage associated with the construction, operation and decommissioning of the Proposed Development.

2.2.23 An Inner Study Area (the Site boundary) and Outer Study Area (within 3km of the Site boundary) were demarcated, whereby both a desk study (July 2024) and subsequent walk-over field survey (20-22 August 2024) were carried out to establish the baseline character of the surrounding area. There are no designated assets within the Inner Study Area.

2.2.24 Sensitive receptors 'Scoped in' were Scheduled Monuments; Listed Buildings; Inventory Gardens and Designed Landscapes; Conservation Areas; and other non-designated historic environment assets. Potential effects are separated into construction and operation phases and summarised below.

Construction Phase Effects

2.2.25 Any ground-breaking activities associated with the construction of the Proposed Development, as well as other activities such as vehicle movement, material storage and landscaping, have the potential to cause permanent and irreversible damage to features of cultural heritage within the site. These have been identified as a probable shieling mound (low sensitivity) which will be removed during construction of the HVDC Converter Station platform and laydown area, and The Lewis Chemical Works (medium sensitivity) which will undergo moderate magnitude adverse impacts from the construction of Peat Restoration works and roadways. Additionally, a moderate archaeological impact was identified due to the potential for undiscovered archaeological remains within the Site to be disturbed.

2.2.26 The proposed mitigation measure would be for effects to be minimised by the Proposed Development layout, which has been designed to avoid impacts on heritage assets as far as possible. Preservation In Situ would be achieved for Caunters Original Chemical Works building (medium sensitivity) by demarcation of an area around the asset to be avoided during the entire construction phase. Peat Probing would be carried out to verify any paleoenvironmental potential of peat on the Site. Additionally, investigations and recording of potentially sensitive archaeological receptors would be carried out prior to construction, facilitated by a CnES Archaeologist. Lastly, written guidelines would be issued to ensure construction is carried out in a precautionary fashion to further avoid unnecessary damage.

Operation Phase Effects

2.2.27 The Proposed Development could result in adverse visual impact on the settings of cultural heritage assets within the Outer Study Area. Designated Assets identified as at risk for adverse impact were outlined as Arnish Point gun emplacements; Loch Arnish dun; Drum Dubh stone circle; Cnoc na Croich chambered cairn; Lews Castle and Lady Lever Park Inventory Garden and Designed Landscape. Overall, it was determined that the effect of the development on the heritage assets listed above was either not significant, or of minor significance, and thus not relevant in EIA terms. Furthermore, mitigation measures are not necessary as the development itself would not cause further disturbance during its lifetime.

Hydrology, Hydrogeology, Geology and Soils

Hydrological Effects

2.2.28 Chapter 9 of the EIAR outlines the likely significant effects on the hydrological environment associated with the construction, operation and decommissioning of the Proposed Development. The chapter considers effects on water quality; flood risk; water resources/watercourses; private/public water supplies; and any effects on Groundwater Dependent Terrestrial Ecosystems (GWDTE).

2.2.29 A desktop assessment was caried out for an area of 2km from the Site boundary, and the River Creed (which extends beyond the study area) was considered in its entirety as the Site is within its catchment area. Various information sources including British Geological Survey (BGS) and SEPA data were consulted. Field study Site walkovers were carried out in July 2024 and in October 2024 to further inform the hydrological assessment.

2.2.30 Sensitive receptors 'Scoped in' were The Abhainn Ghrioda (River Creed) watercourse; Stornoway Harbour; other Southern and Northern Watercourses; and GWDTE. All were assessed to be of high sensitivity, except for GWDTE which were determined to be medium sensitivity. Flood Risk, Watercourse Crossings, and Private Waters Supplies were 'Scoped out'. Mitigation measures taken are separated into construction and operation phases and summarised below.

2.2.31 Construction stage mitigation measures are centred around adhering to good practice approaches set out in the CEMP, as well as through adherence to typical environmental management policies underpinning all SSEN works, referred to as GEMPs. GEMPs relevant to hydrological environmental management include Oil Storage and Refuelling (TG-NET-ENV-510); Watercourse Crossings (TG-NET-ENV-515); and Private Water Supplies (TG-NET-ENV-518). Relevant mitigation measures are designed to manage temporary surface water runoff increase; changes to downstream watercourse hydrodynamic status; contamination of the water environment; watercourse crossings; and GWDTE.

2.2.32 Hydrological mitigation measures are outlined in the detailed drainage strategy (Technical Appendix 2.1, EIAR Volume 4). These include adherence to legislation such as the Water Environment (Controlled Activities) (Scotland) Amendment Regulations 2021 (CAR); safe storage measures of potential contaminants; and the use Sustainable Drainage Systems (SuDS) and runoff diversion measures. Mitigation measures are also designed-in to the Proposed Development (e.g. minimal watercourse crossings). Specific measures include:

- Storage of potentially contaminative substances and fuels within areas of impermeable hardstanding;
- Perimeter swales;
- The use of silt fences at locations where works are proposed within 50m of a watercourse;
- Settlement lagoons;
- The use of settlement tanks; and
- Vegetated and non-permeable geotextile lined detention basins.

2.2.33 During the operational stage, mitigation measures focus on the management of surface runoff and the management of potential contaminants/pollutants. These outlined in the detailed drainage strategy (Technical Appendix 2.1, EIAR Volume 4), and incorporated into the site maintenance programme and underpinned by adherence to SEPA guidance, including the preparation of emergency plans to manage accidental pollution events.

Geology and Soils Effects

2.2.34 Chapter 10 of the EIAR outlines the likely significant effects with respect to geology and soils associated with the construction, operation and decommissioning of the Proposed Development. This chapter primarily focuses on the effects of the Proposed Development on peat and carbon rich soils underlying the site.

2.2.35 Data was collected through desk study and subsequent field study peat surveys (stage 1 in April 2024 followed by Stage 2 in August 2024). These surveys took place within the Study Area which amounted to all land within the Site. The sensitive receptor 'Scoped in' to the assessment was soils and peat, with high sensitivity peat deposits underlying the Site. Potential effects during the construction phase include compaction of soil; potential increased erosion due to disturbances caused during construction; changes in soil hydrology (impacts on the water table); resultant peat slide; and loss of peatland habitats and carbon rich soils through excavations.

2.2.36 Mitigation measures during the construction phase are both designed-in to the development and implemented during construction procedures. Siting/design-based mitigation measures include:

- Initial site selection and layout planning served to avoid effects on sensitive receptors as far as practically possible, considering combined ecological, landscape, hydrological and peatland effects.
- Minimising overlap between ancillary infrastructure (e.g. permanent SuDS ponds) and temporary infrastructure (laydown areas) and other enabling works (e.g. borrow pits) with deeper peat areas.
- Temporary construction laydowns and SUDs ponds focused on shallower areas of peat / organic soil.

2.2.37 Best practice measures for the management of construction activities are used to minimise disturbance to soils, set out in the OPMP (Technical Appendix 10.2: Outline Peat Management Plan, EIAR Volume 4), and PLHRA (Technical Appendix 10.3: Peat Landslide Hazard Risk Assessment). A detailed CEMP and OPMP would be implemented to ensure adherence to these measures. These measures include:

- A combination of reuse and restoration which has formed the peat management strategy (as described in OPMP (Technical Appendix 10.2: Outline Peat Management Plan, EIAR Volume 4). The OPMP sets out the specific measures to be taken to minimise permanent damage to peatland through mitigation and restoration measures.
- Peatland habitat reinstatement and active restoration carried out in line with Technical Appendix 7.4: Outline Habitat Management Plan (EIAR Volume 4)
- Peatland reinstatement completed in line with the NatureScot recommendation of a 1:10 lost to restored/enhanced ratio aligned with the peatland Mitigation Hierarchy (as outlined in the NPF4 Policy 5 *Soils*[7])[8].
- Monitoring of the Site for minimum 5 years after works have concluded.

2.2.38 Following the application of the mitigation measures listed above, no significant residual effects are predicted.

Traffic and Transport

2.2.39 Chapter 12 of the EIAR outlines the potential effects on Traffic and Transport associated with the construction, operation and decommissioning of the Proposed Development.

2.2.40 Data was collected through desk study and subsequent field surveys (Automatic Traffic Count (ATC) surveys) were carried out in January 2025 in locations encompassed by the Study Area to establish baseline traffic flows. The Study Area was defined as all access points for the Proposed Development and conceivable routes connecting these to the external public road network, which were Arnish Road; A859 between Stornoway and Tarbert; A858 between the A859 and Garryahine; and A857 between Stornoway and Barvas. Further data was adapted from the Department for Transport (DfT) and used to inform the assessment.

2.2.41 Expected increases in traffic are calculated by estimates of vehicle movements for both HGV traffic and staff vehicles which are outlined according to the construction programme. Peak traffic generating months are used as a baseline of disturbance levels to ensure mitigation measures are appropriately calculated. The peak generating period will likely be months 13-22 (2027) if construction programme (included in Technical Appendix 12.2, EIAR Volume 4) is adhered to.

2.2.42 Likely environmental effects relating to Traffic and Transport are assessed in terms of effect significance terms of both receptor sensitivity (from negligible to high) and magnitude of effects (from negligible to major) for each effect type. The significant effects predicted in the Traffic and Transport Assessment are:

- Severance of communities: It is estimated that traffic on all roads included in the Study Area would be major. Being Medium pr High in sensitivity, the A859, A858 and A857 are predicted to be significantly affected by the increase in traffic during the construction phase.
- Road vehicle driver and passenger delay: Significant impacts are predicted during peak traffic generating times, discussed in Paragraph 4.2.39). Based on the construction schedule, high volumes of HGVs will be the primary cause of delays during construction traffic peak periods.

[7] National Planning Framework 4 (2024). At: https://www.gov.scot/publications/national-planning-framework-4/ (accessed 18/02/2025)

[8] Nature Scot (2023). Advising on peatland, carbon-rich soils and priority peatland habitats in development management. At: https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management#:~:text=All%20development%20proposals%20should%20adhere,Minimise%20%E2%80%93%20by%20reducing%20the%20impact. (accessed 24/02/2025)

- Non-motorised user delay and amenity: Significant negative impacts on user delay and amenity is predicted for cyclists, who are identified as the primary non-motorised and amenity-based users of the local road network.
- Fear and intimidation on and by road users: Significant fear and intimidation is expected to affect cyclists on the road due to the increase in traffic volume as well as the increased frequency of large vehicles (HGVs) during the construction programme.
- Road user and pedestrian safety: while there are no specific road safety issues in the immediate vicinity of the Site which would raise concerns in respect to bringing forward the Proposed Development, it is predicted that road accident frequency would increase during the construction phase simply arising from an increased overall volume of traffic on the local road network. Due to the severity of this effect, mitigation is required to reduce the likelihood of events impacting road user and pedestrian safety.

2.2.43 Mitigation measures proposed during the construction phase are laid out in the CTMP. These include agreed construction hours used to minimise public disturbance and agreed with CnES well in advance; measures to minimise the number of vehicle trips to the Site by staff; reduced construction aggregates usage to reduce HGV demand; designated routes to and from the site; site signage and other site traffic management procedures. The residual effects after implementation of the CTMP are predicted to be minor and thus not significant.

Noise

2.2.44 Chapter 11 of the EIAR outlines the likely significant effects with respect to Noise and Vibration associated with the construction and operation of the Proposed Development.

2.2.45 Data was collected through a desk study encompassing the Study Area of 1.5km from the Proposed Development, followed by a field study consisting of noise monitoring measurements made between April and May 2023. Ten receptors found within the Study Area were 'Scoped in' to the assessment. Potential effects were identified as:

- Construction noise: the effects of blasting, static and quasi-static construction noise from construction plant, such as excavators, dump trucks and cranes;
- Construction vibration: traffic of heavy goods vehicles passing by NSRs and vibration due to blasting for the foundations works; and
- Operational noise: noise from cooling equipment and ventilation and transformer noise

2.2.46 Of these, all but one were determined to be of high sensitivity to Noise and Vibration due to being in current recreational or residential use.

2.2.47 Estimates of Noise and Vibration effects derived from information on plant activities, types, quantities, and usage, as well as vehicle movements were combined to generate the Construction Noise Assessment. The Construction Noise Assessment predicts that construction noise has the potential to exceed the 55 dB noise limit during the platform creation, civils and transformer installation works, at all noise sensitive receptors with a maximum of 72 dB(A) predicted at Macaulay Farm; therefore, the impact is assessed as Major and Significant.

2.2.48 The primary mitigation measure taken is the implementation of a CNMP which includes minimising the noise as much as is reasonably practicable at source; attenuation of noise propagation; carrying out identified high noise level activities at a time when they are least likely to cause a nuisance to residents; and providing advance notice of unavoidable periods of high noise levels to residents. The CNMP also includes a suite of good practice measures to ensure noise and vibration is minimised through modifications to the use and features of plant and other vehicles; limit noise transmission with measures such as distance, acoustic screening and enclosure; and practical measures to reduce air overpressure and/or vibration from blasting.

2.2.49 With the Applicant committed to applying the mitigation measures as laid out in the CNMP as discussed above, no significant residual effects are predicted.

2.3 Cumulative Effects

Introduction: Cumulative Developments

2.3.1 Table 4.3: Cumulative Developments (EIAR Volume 4) outlines other existing or future committed developments that have the potential to result in significant cumulative effects in combination with those resulting from the Proposed Development. Environmental Constraints and Assessment Conclusion.

2.3.2 The developments are:

- Harris-Stornoway 132kV OHL Replacement;
- Stornoway Wind Farm;
- Arnish Road Upgrade;
- Stornoway Deep Water South project; and
- Marybank Quarry extension.

2.3.3 Cumulative effects are outlined according to the previous chapter structure of effects, and are thus as follows:

- Landscape and Visual cumulative impacts;
- Cultural Heritage cumulative impacts;
- Ecological and Nature Conservation cumulative impacts and cumulative Ornithological habitat loss risks;
- Hydrological, Hydrogeological, and Geological/Soils cumulative impacts;
- Traffic and Transport cumulative impacts; and
- Noise cumulative impacts.

Landscape and Visual

2.3.4 Two receptors would accrue significant collective cumulative effects from the addition of the Proposed Development to Stornoway Wind Farm and any of the other developments in isolation or combination:

- B3 Lower Sandwick (major); and
- B5 Newton Street (major to moderate – major).

2.3.5 Two receptors would accrue significant collective cumulative effects from the addition of the Proposed Development to Stornoway Wind Farm and any of the other developments in isolation or combination, but these effects would be no greater than those arising from the Proposed Development or Stornoway Windfarm in isolation.

- Rec4 Below Cnoc na Croic; (major); and
- Rec 7 Marybank picnic benches.

2.3.6 One receptor would accrue significant collective cumulative effects over a wider area from the addition of the Proposed Development to Stornoway Wind Farm and any of the other developments in isolation or combination, but these effects would be no greater than those arising from Stornoway Wind Farm in isolation.

- LCT 323 Rocky Moorland (moderate – major adverse).

2.3.7 For all other landscape and visual receptors, there are no significant cumulative effects predicted.

Ecological and Nature Conservation

2.3.8 Due to the low magnitude of impacts on habitats from the Proposed Development as well as any cumulative developments, no significant cumulative impacts on habitats are predicted. No impacts from the Proposed Development are predicted on otter so no significant cumulative impacts on otter are predicted.

Ornithology

2.3.9 The potential for significant cumulative impacts on Schedule 1 raptor species must be assessed between the Proposed Development, Stornoway Wind Farm and Creed Quarry Extension. The location of these developments means that each has potential to impact a different hen harrier territory. Disturbance impacts are possible from disturbance on hen harrier during construction since the developments are within disturbance distance to hen harrier nests (750 m), which can lead to the abandonment of nests and territories. These impacts would be short-term, reversible, adverse impacts on features of regional importance, with the potential to result in a significant impact.

2.3.10 There are no other potential cumulative effects identified during construction or operational phases of the Proposed Development.

Cultural Heritage

2.3.11 During its operational lifetime, the residual cumulative effects of the Proposed Development on the settings of heritage assets in the wider study area would be the same as the predicted cumulative effects. Any changes to the cumulative operational effects during the operational lifetime of the development would come because of changes to the surrounding cumulative developments. As a result, there are no cumulative effects to address at this stage.

Hydrological, Hydrogeological, and Geological/Soils

2.3.12 There are no cumulative impacts predicted on the water environment resulting from the potential interaction of the Proposed Development with operational developments.

2.3.13 There are no cumulative effects predicted regarding geology and soils.

Traffic and Transport

2.3.14 It is highly unlikely that the peak construction period associated with another development in the area would overlap with the peak construction period of the Proposed Development as the applications are at different stages in the planning process and each development has varying lengths of construction period. Therefore, cumulative effects on Traffic and Transport are regarded as unlikely to occur.

2.3.15 Furthermore, high traffic generating activities, such as the importation of stone and concrete, would naturally be staggered due to local supply chain limitations.

2.3.16 The construction stages of each development would be programmed to ensure that the peak traffic generating months do not coincide (through the implementation of CTMPs for each development). This measure acts to further minimise the likelihood of any cumulative effects arising.

Noise

2.3.17 There is the potential for major Noise impact and therefore significant cumulative effects on Noise arising from Stornoway Windfarm during the construction and operational phases. A noise assessment must be conducted for this development and the cumulative effects evaluated when information is made available.

2.3.18 To mitigate cumulative effects on Noise, the CNMP for the Proposed Development must also include cumulative 3rd Party Developments. Any possible significant cumulative construction impacts could be mitigated with communication with the respective developers and a combined CNMP during potential high noise activities. With the appropriate mitigation, cumulative effects are likely to be minor and not significant.

2.3.19 Operational noise effects are expected to be reduced further with appropriate engineering design or mitigation during detailed design. It is expected that operational noise can be reduced further where minor effects are maintained and therefore residual operational effects are deemed not significant.

2.4 Environmental Constraints and Assessment Conclusion

2.4.1 The environmental effects of the Proposed Development were summarised across all subject areas and discussed in terms of construction and operational phases. Proposed mitigations were also laid out. Effects and the proposed mitigation measures were as follows:

- Landscape and Visual: The Proposed Development would result in effects, both in the construction phase and operational phase, for receptor type *LCT 322 Boggy Moorland – Outer Hebrides*. These effects would be controlled by proposed mitigation measures embedded during the construction phase intended to shield the surrounding sensitive receptors from the effects of the proposed Development.
- Ecology and Nature Conservation: During the construction phase of the Proposed Development, effects are predicted to be limited and therefore not significant, provided mitigation measures are followed as outlined in the OHMP and CEMP. Additional measures such as pre-construction surveys and siting design ensure ecological impact is minimised.
- Ornithology: Effects identified as requiring mitigation hen harrier nest disturbance (significant) and non-Schedule 1 birds' nest destruction, both with potential to occur during construction. These will be minimised by adherence to best practice mitigation measures outlined in the GEMP, CEMP, and SPP. Additional use of continuous surveys and nest exclusion zones are used to minimise the risk of hen harrier nest destruction. With the proposed mitigation measures in place, there are no residual effects predicted.
- Cultural Heritage: The Proposed Development's construction phase could cause irreversible damage to cultural heritage features, including the removal of a probable shieling mound and moderate impacts on The Lewis Chemical Works. Mitigation measures include adjusting the layout to avoid heritage assets, preserving certain structures in situ, conducting peat probing and archaeological investigations, and following precautionary construction guidelines. Overall, the impact on cultural heritage is minimized with these mitigation measures.
- Hydrology, Hydrogeology, Geology and Soils: The main effects of the Proposed Development on hydrology include potential impacts on water quality, flood risk, and water resources during construction, and surface runoff and contamination risks during operation. For geology and soils, the construction phase could lead to soil compaction, increased erosion, changes in soil hydrology, peat slide, and loss of peatland habitats. Mitigation measures for hydrology involve adhering to good practices in the CEMP and GEMPs, managing surface water runoff with SuDS, and ensuring safe storage of potential contaminants. For geology and soils, measures include careful site selection, minimizing overlap with deeper peat areas, best practices for construction activities, peatland habitat reinstatement, active restoration, and monitoring for at least five years. Overall, no significant residual effects are predicted after applying these mitigation measures.
- Traffic and Transport: Data from desk studies and field surveys identified significant effects during construction, including community severance, road vehicle delays, non-motorised user delays, fear and intimidation for cyclists, and increased road accident frequency. Mitigation measures in the CTMP include agreed construction hours, minimizing vehicle trips, reducing HGV demand, designated routes, site signage, and traffic management procedures. After implementing the CTMP, residual effects are predicted to be minor and not significant.
- Noise: Potential effects include construction noise from blasting and machinery and construction vibration from heavy vehicles and blasting. Construction Noise Assessment predicts that construction noise could exceed the 55 dB limit, reaching up to 72 dB(A) at Macaulay Farm, making the impact major and significant. Mitigation measures include adherence to a CNMP to minimize noise at the source, attenuate noise propagation, schedule high-noise activities to minimize nuisance, and provide advance notice to residents. The CNMP also includes good practice measures to reduce noise and vibration from plant and vehicles, use acoustic screening, and manage blasting impacts. With these measures, no significant residual effects are predicted.

2.4.2 Overall, with these mitigation measures in place, no significant residual effects are predicted.

2.4.3 Cumulative effects were also discussed in relation to the Proposed Development. These were identified as follows:

- Landscape and Visual: Significant cumulative effects are anticipated for specific receptors, particularly in combination with the Stornoway Wind Farm. However, for most receptors, no significant cumulative effects are predicted.
- Ecological and Nature Conservation: No significant cumulative impacts on habitats or otter populations are predicted due to the low magnitude of impacts from the Proposed Development and other cumulative developments.
- Ornithology: Potential significant cumulative impacts on Schedule 1 raptor species, particularly hen harriers, have been identified due to disturbance during construction. These impacts are expected to be short-term and reversible.
- Cultural Heritage: The cumulative effects on heritage assets are expected to remain consistent with the predicted effects, with no additional cumulative impacts anticipated during the operational lifetime of the Proposed Development.
- Hydrological, Hydrogeological, and Geological/Soils: No cumulative impacts on the water environment, geology, or soils are predicted.
- Traffic and Transport: Cumulative effects on traffic and transport are considered unlikely due to the staggered construction periods and local supply chain limitations.
- Noise: Potential significant cumulative noise impacts during construction and operation phases have been identified. Mitigation measures, including coordinated noise management plans, are expected to reduce these impacts to minor and not significant levels.

2.4.4 Overall, with appropriate mitigation measures in place, the cumulative effects of the Proposed Development in combination with other developments are expected to be manageable and not significant.

3. PLANNING POLICY REVIEW

3.1 Introduction

3.1.1 This section considers national and local planning policy, as well as relevant guidance and advice notes to provide an assessment of the Proposed Development in policy terms. There are also several national energy policy documents which are material considerations to be taken into account in the determination of this planning application, and these are considered in Section 2.2.

3.1.2 Relevant national planning policy contained within the National Planning Framework 4 (NPF4) 2019[9] is identified in Section 2.2 of this Planning Statement, and local planning policies as identified in the Outer Hebrides Local Development Plan (OHLDP) 2018[10] are also identified in Section 2.3 of this Planning Statement.

3.1.3 By virtue of section 24 of the 1997 Act, NPF4 is part of the development plan. It also includes any extant local development plan for the area which, for the purposes of this application, includes the Outer Hebrides Local Development Plan ('the OHLDP') which was adopted on 19 November 2018. In accordance with section 24(3) of the 1997 Act, in the event of any incompatibility between NPF4 and the OHLDP, NPF4 will prevail. Sections 25 and 37 of the 1997 Act require determinations to be made in accordance with the development plan unless material considerations indicate otherwise. This Planning Statement will convey that the Proposed Development accords with both NPF4 and the OHLDP.

3.2 National Planning Policy

National Planning Framework 4

3.2.1 NPF4 was adopted by the Scottish Government in February 2023, following approval by the Scottish Parliament in January 2023. It sets out the Government's national spatial strategy for Scotland, identifying regional priorities, national developments, and national planning policy.

3.2.2 The Proposed Development is situated within the North and West Coast and Islands region, with the key spatial priorities for that region identified at Part 1 of the document. NPF4 states that *"This part of Scotland will be at the forefront of our efforts to reach net zero emissions by 2045"*, as well as stating that *"As one of the most renewable energy rich localities in Europe with significant natural resources, there is a real opportunity for this area to support our shared national outcomes".* As part of the national spatial strategy, NPF4 also makes it clear that Scotland must make significant progress by 2030 to achieve net zero emissions target by 2045. As outlined within Annex A, NPF4 also recognises that it is required "by law" to contribute to 6 key outcomes, two of which include "meeting any targets relating to the reduction of emissions of greenhouse gases" and "securing positive effects for biodiversity"

3.2.3 The Proposed Development is classed as a National Development. National developments are significant developments of national importance required to deliver NPF4's spatial strategy. As such, their need is established at a national level and their designation means that the principle of development is broadly supported in the consenting processes and that the principle of the development does not need to be agreed in later consenting processes. The Proposed Development can draw significant support from the spatial strategy of NPF4.

3.2.4 Contained within the NPF4 are six overarching spatial principles, this includes:

- Just Transition- We will empower people to shape their places and ensure the transition to net zero is fair and inclusive.
- Rural revitalisation- We will encourage sustainable development in rural areas, recognising the need to grow and support urban and rural communities together.

3.2.5 It is expected that the above spatial principals will support the planning and delivery of:

[9] National Planning Framework 4 (2024). At: https://www.gov.scot/publications/national-planning-framework-4/ (accessed 18/02/2025)
[10] Comhairle nan Eilean Siar (2018). Outer Hebrides Local Development Plan. Available at: https://cne-siar.gov.uk/wp-content/uploads/2024/01/Outer-Hebrides-Local Development-Plan-2018.pdf

- Sustainable places, where we reduce emissions, restore and better connect biodiversity;
- Liveable places, where we can live better, healthier lives; and
- Productive places, where we have a greener, fairer

3.2.6 Page 22 of the NPF4 sets out the Regional Spatial Priorities for the North and West Coast and Islands.

- The NPF4 recognises the importance this area plays in supporting the generation of renewable energy, noting that the area is one of the most renewable energy rich localities in Europe. As set out on page 23 one of the priorities is to:
- Maximise the benefits of renewable energy whilst enhancing blue and green infrastructure, decarbonizing transport and building resilient communities.

3.2.7 Recognition is given within annex C that to support the growth of the green economy dependence will be given on the delivery of improved grid connections, including high voltage grid cables connecting the tree island groups to the mainland.

3.2.8 The Proposed Development would fall under National 1, which is defined as 'Energy Innovation Development on the Islands'. Annex B sets out the nature of developments which would fall under this designation. It is considered that 'proposed developments in the Outer Hebrides, Shetland and Orkney Island groups, for renewable energy generation, renewable hydrogen production, infrastructure and shipping and associated opportunities in the supply chain for fabrication, research and development' fall within this designation. Specifically, it is noted that for the Outer Hebrides, development which supports the Arnish Renewables Base and Outer Hebrides Energy Hub. The specific classes of development which fall under this designation includes (but is not limited to):

- New or updated on and/or offshore infrastructure for energy generation from renewables exceeding 50 megawatts capacity;
- Electricity transmission cables and converter stations on and/or offshore 132 kilovolts (kv) and above;

3.2.9 Furthermore, the proposed development would also fall under National Development 3 of the NPF4. This designation is defined as 'Strategic Renewable Electricity Generation and Transmission Infrastructure.' This designation seeks to support renewable electricity generation, repowering and expansion of the electricity grid. Specifically, any 'major' development which falls under the following is considered a National Development, under this designation;

- New and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132kv or more; and
- New and/ or upgraded infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations.

3.2.10 Given the above, it is considered that the Proposed Development both aligns with the National and regional strategy for the area. It is further clear that Proposed Development can be considered a National Development, under the NPF4.

3.2.11 the Proposed Development would fall under both National Developments 1 and 3 of the NPF4. NPF4 sets out national planning policy in Part 2 of the document. Following review, the policies which have been identified as relevant to the Proposed Development are set out below:

- Policy 1 - Tackling the Climate and Nature Crisis.
- Policy 2 - Climate Change Mitigation and Adaptation
- Policy 3 - Biodiversity;
- Policy 4 - Natural Places;
- Policy 5 - Soils;
- Policy 6 – Forestry, woodland and trees
- Policy 7 - Historic Assets and Places.
- Policy 11 - Energy;

- Policy 12 - Zero Waste;
- Policy 22 - Flood Risk and Water Management;
- Policy 23 - Health and Safety; and
- Policy 29 – Rural development.

3.2.12 Table 3-1 below describes each policy and its relevance to the Proposed Development.

Table 3-1 Analysis of NPF4 Policies

Policy	Key Considerations	Relevance to the Proposed Development
Policy 1 – Tackling the Climate and Nature Crisis	*Significant weight will be given to the global climate and nature crisis when considering all development proposals, with intended policy outcomes being "zero carbon" and "nature positive places".*	The Proposed Development serves to enable the grid connection of existing and future renewable energy projects from Lewis and its surrounding area and aims to connect this to mainland Scotland and the wider UK transmission system. This enhancement to transmission connection is of the ideal capacity and location to legitimise the future development of renewable energy generating projects to Lewis and the surrounding area. In doing so, the Proposed Development will support Scotland's ambitions to become zero carbon by widening of Scotland's renewable generation capacity. Furthermore, the Proposed Development will enable residents' access to the UK transmission network to reduce reliance on local carbon emitting energy sources. Similarly, the Proposed Development will also reduce mainland reliance on intermittent fossil fuel use during periods of inconsistent/insufficient by supporting renewable generation and the access in clean energy across the UK. As such, Policy 1 of NPF4 is supportive of the Proposed Development.

Policy 2 - Climate change mitigation and adaptation	*Development proposals will be sited and designed to minimise lifecycle greenhouse emissions as much as possible and adapt to the current and future risks of climate change. Additionally retrofit measures that reduce emissions or support this adaptation process will be supported. Intended policy outcomes being minimised emissions from developments and places that are more resilient to climate change.*	The Proposed Development mitigates climate change and minimises carbon emissions associated with energy generation by facilitating the transmission of electricity generated from renewable sources. A careful site selection and design process has been undertaken to minimise environmental effects, with any unavoidable impacts mitigated as far as possible. Without the Proposed Development to safeguard energy transmission for present and future demand, a significant contributor to renewable energy in this area will be lost, potentially limiting capacity to achieve climate change mitigation targets associated with Net Zero policy. As such, while the Proposed Development requires some mitigation to reduce any negative externalities associated with NPF4. It is therefore considered that Policy 2 is supportive of the Proposed Development, due to its role in the transition to Net Zero.
Policy 3 - Biodiversity	*National or major development will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity and nature networks. Proposals within these categories will demonstrate how they have met all of the following criteria:* *the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;* *wherever feasible, nature-based solutions have been integrated and made best use of;* *an assessment of potential negative effects which should be fully mitigated in*	The key biodiversity challenges of the development have been identified in the EIA Scoping Report. Primary sources of negative effects on biodiversity are identified as general issues (lighting, noise, dust and visual disturbance) managed by a CEMP, and specific impacts on protected habitat types such as peatland. The removal of existing Grade 1 Peatland is an unavoidable consequence of the Proposed Development. All of the appropriately sized alternative sites assessed gave rise to a similar issue. The proposed mitigation would include the reinstatement of damaged peatland, both on and off site. Disturbance to the existing peatland will be minimised in keeping with national regulations. Access roads, burn diversions and other essential infrastructure for the substation are designed to minimise peatland damage. In addition, the Applicant aims to avoid the removal of trees and vegetation where possible. The Proposed Development would deliver a minimum Biodiversity Net Gain (BNG) of 10 %. It is noted that whilst 10% BNG is not required by Policy 3 this aligns with SSEN Transmission's commitment to achieving 10% BNG on all of its major development sites[11] and its commitment to

[11] SSEN Transmission (2019). A Network for Net Zero: Our Approach to Implementing Biodiversity Net Gain, December 2019. At: https://www.ssen-transmission.co.uk/globalassets/documents/a-network-for-net-zero/supporting-evidence/our-approach-to-implementing-biodiversity-net-gain-.pdf (accessed 24/02/2025)

	line with the mitigation hierarchy prior to identifying enhancements; *significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and* *local community benefits of the biodiversity and/or nature networks have been considered.*	ensure on all SSEN Transmission projects would result in a net gain in biodiversity. This commitment made by the Applicant to 10% BNG goes beyond the mitigation required by CnES, thus demonstrating the Applicant's commitment to adhering to the requirements of NPF4 Policy 3. A BNG assessment shall be undertaken to ensure a 10% net gain in biodiversity. A further discussion related to irreplaceable habitats, nature-based solutions, biodiversity enhancements (i.e. BNG), etc. has been detailed out in Section 3.2 of this Planning Statement. under *Ecology and Nature Conservation*. Following the implementation of appropriate mitigation measures, any residual damage in terms of Biodiversity is only accepted in proportion to the social and economic value of the project. The environmental benefits of the Proposed Development, in addition to the social and economic contributions it offers, are in should outweigh any potential damage caused to the biodiversity of the Proposed Site.
Policy 4 – Natural Places	*Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported. Development proposals affecting designated areas such as Special Area of Conservation or Special Protection Areas, National Parks, National Scenic Areas, Sites of Special Scientific Interest or National Reserves will only be supported with due assessment. This involves consideration given to the benefits of development versus the detrimental impacts on nature, where enhancing and protecting designated areas is given significant weight. Additionally, development proposals within Nature Scot Wild Areas will only be supported to meet renewable energy targets or to support fragile rural communities.*	The site is not located within any designated sites. However, there are two designated areas located in proximity of the site. These are Lewis Peatlands SAC, Tong Saltings SSSI and the Lewis Peatlands SPA and Ramsar. Lewis Peatlands SAC and Tong Saltings SSSI are located sufficiently far away for there not hydrologically connected with the site. The site lies 6km east of Lewis Peatlands, and 3km southwest of Tong Saltings SSSI and as such it is unlikely that the Proposed Development would have an impact on statutory designated sites during construction or throughout the lifetime of the Proposed Development. It was found during the ornithology surveys that the nearest territory of a Hen Harrier is approximately 0.6km away from the site. Therefore, there is potential that the Proposed Development could have direct, adverse, medium magnitude effect on a regional important feature. Mitigation measures have therefore been recommended. This includes further surveys which will be conducted a year prior to the commencement of works, which will continue through the construction process. As outlined within the Chapter 5 of the EIAR, in terms of visual impact, there is no theoretical visibility from the South Lewis, Harris and North Uist National Scenic Area (NSA). The proposed Development does not conflict with NPF4 Policy 4.

Policy 5 - Soils	*Development proposals will only be supported if they are designed and constructed by avoiding and then minimising soil disturbance on undeveloped land, in a manner that protects soil from damage. Restrictions can be lifted in prime agricultural areas and peatlands for renewables infrastructure and transmission, with assessments of conditions guiding the best way to develop the area with minimal negative impact on soils.*	The Proposed Development site is primarily located on Class 1 peatland. It is noted that Class 1 peatland is regarded as peatland of the highest quality and is considered to be nationally important. To construct the footprint and foundations of the Proposed Development, it is recognised that peat will need to be removed. An Outline Peat Management Plan (OPMP) produced in accordance with SEPA guidance[12] and included as an appendix to the EIAR, details the proposed management techniques for handling, storing and depositing peat for reinstatement, which will be the primary mitigating method for dealing with peat arisings. The OPMP is developed using the NPF4 peat mitigation hierarchy. This directs development to firstly avoid peatland areas, secondly minimise impact, thirdly engage in peatland restoration, and lastly attempt to offset any remaining residual impact on peatland with on-site measures preferred. As established in Section 1.6 of this Planning Statement *Consideration of Alternatives*, avoidance of peatland was not possible during the site selection process, as peatland forms a large part of the soil morphology on the Isle of Lewis. The applicant aims to minimise the impact by further developing the OPMP, with restoration work being envisaged as the primary mitigation measure for any damage to the peatland during construction. The OPMP includes an estimation of peat volumes and outlines measures necessary to minimise peat and habitat disturbance. The OPMP also provides a clear description of mitigation measures proposed to minimise potential adverse impacts on peat, peatland function and to ensure best practice and effective excavation, movement and re-use and reinstatement of peat. This includes the integration of peat reuse measures with habitat management proposals. There is some tension with NPF4 Policy 5 the policy does contain a hierarchy to be utilised where peat avoidance is not possible. The Proposed Development would include all of the necessary mitigating measures required to reduce impacts on peat as far as is reasonably practicable The role of the Proposed Development in supporting national Net Zero targets and in contributing to addressing the climate emergency does however need to be weighed against any impacts on peat in the construction phase.

[12] SEPA (2012) Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste.

Policy 6 – Forestry, woodland and trees	*Loss or damage to ancient woodland, native woodlands, hedgerows and trees of high biodiversity value, as well as the fragmenting of woodland habitats will not be supported unless there is significant mitigation. In cases involving woodland removal, support will only be given where there are significant and clearly defined public benefits. Compensatory planting will likely be expected. Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.*	The Proposed Development is not located on an area containing any Tree Preservation Orders (TPOs) or protected woodland habitat. Moreover, whilst it is recognised that there will be some tree removal, it is considered that this is justified given the significant economic and environmental brought by the Proposed Development. Furthermore, the proposals include significant mitigation measures which includes further planting to provide screening to the development. It is therefore considered that the Proposed Development aligns with Policy 6 of the NPF4.
Policy 7 – Historic Assets and Places	*Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. Proposals should also be informed by national and guidance on managing change in the historic environment, and information held within Historic Environment Records.* *Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts.*	The construction of the Proposed Development would lead to some cultural heritage impacts, including permanent damage to a probable shieling mound and moderate adverse impacts on The Lewis Chemical Works. Additionally, there is potential for undiscovered archaeological remains to be disturbed. Mitigation measures include designing the layout to minimize impacts, preserving the Caunters Original Chemical Works building in situ, conducting peat probing, and recording sensitive archaeological sites before construction. During the operation phase, the development may cause minor visual impacts on several heritage assets, but these effects are not considered significant in Environmental Impact Assessment (EIA) terms, and no further mitigation is necessary. Subject to mitigation measures being implemented, the Proposed Development would not conflict with NPF4 Policy 7.

Policy 11 - Energy	*Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported including enabling works, such as grid transmission and distribution infrastructure.* *In considering the variety of impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets. Grid capacity should not constrain renewable energy development. It is for developers to agree connections to the grid with the relevant network operator. In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.*	The Proposed Development is supported by Policy 11 as it forms part of the strategic electricity transmission network. In addition, the Proposed Development would enable the continued transmission of electricity generated from renewable sources to the national grid through the newly established link, thus supporting Scotland's ambitions to reduce its carbon emissions and ultimately the transition to a Net Zero system. The Proposed Development is capable of addressing all of the stated criteria of the stated assessment criteria of NPF4 Policy 11.
Policy 12 – Zero Waste	*Development proposals will seek to reduce, reuse, or recycle materials in line with the waste hierarchy. Development proposals will be supported where they: reuse existing buildings and infrastructure; minimise demolition and salvage materials for reuse; minimise waste, reduce pressure on virgin resources and enable building materials, components and products to be disassembled, and reused at the end of their useful life; use materials with the lowest forms of embodied emissions, such as recycled and natural construction materials; use materials that are suitable for reuse with minimal reprocessing*	No significant waste is anticipated to arise during construction and litter shall be managed in accordance with appropriate waste regulations. No operational waste generation is anticipated, and no significant effects will be likely to arise from waste generation during construction or operation. SSEN follows the waste hierarchy as mentioned in the General Environmental Management Plan (GEMP) – Waste Management. The hierarchy is as follows: – Eliminate - Design out waste; – Reduce - Minimise waste generation; – Reuse - Reuse materials on site if possible; – Recycle - Reprocess materials for off-site use; – Recover - Recovery of energy from waste sent off site; and – Dispose - Least desirable option – last resort. A Site Waste Management Plan (SWMP) would be prepared and agreed prior to construction works starting. Therefore, the Proposed Development does not contravene this policy. It is therefore considered that the Proposed Development would align with NPF4 Policy 12. As outlined in the Chapter 10 of the EIAR, the Proposed Development has utilised SEPA's guidance in relation to developments on peat and waste peat and aligns with Policy 5 of the NPF4 and utilises the hierarchy in respect to carbon rich soils. Therefore, peat will be reused to ensure that minimal waste is produced as part of the proposals. As noted within Outline Peat Management Plan excavated Peat will

		be reused in two ways. This includes the reinstatement of temporary excavations for infrastructure, including borrow areas and the restoration of Creed North. It is therefore considered that the Proposed Development accords with Policy 12 of the NPF4.
Policy 22 – Flood Risk and Water Management	*Development proposals at risk of flooding or in a flood risk area will only be supported if they are for:* *i. essential infrastructure where the location is required for operational reasons;* *ii. water compatible uses;* *iii. redevelopment of an existing building or site for an equal or less vulnerable use; or.* *iv. redevelopment of previously used sites in built up areas where the LDP has identified a need to bring these into positive use and where proposals demonstrate that long-term safety and resilience can be secured in accordance with relevant SEPA advice*	Flood Risk and Water Management assessments and an overview of the proposed measures is contained within Chapter 9 of the EIAR 'Hydrology', which states that according to SEPA flood maps, no areas within the Proposed Development are at elevated risk of flooding from rivers, the sea or surface water Appropriate flood risk mitigation measures have been embedded into the Proposed Development, both at the construction stage and operational stage. A drainage strategy is provided as Technical Appendix 2.1 of the EIAR and provides detail of the proposed management of surface water runoff for the Proposed Development. An outline CEMP will ensure adherence to the agreed measures. Based on the Flood Risk Assessment and considering the design mitigation and construction good practice, the probability of impacts on flood risk has been reduced sufficiently. Therefore, the Proposed Development aligns with this policy.
Policy 23 – Health and Safety	*Development proposals that will have positive effects on health will be supported.* *Development proposals which are likely to have a significant adverse effect on health will not be supported.* *Development proposals that are likely to raise unacceptable noise issues will not be supported. The agent of change principle applies to noise sensitive development. A Noise Impact Assessment may be required where the nature of the proposal or its location suggests that significant effects are likely.*	Noise mitigation measures have been embedded into the Proposed Development. A Construction Noise Management Plan (CNMP) will be prepared with recommendations related to noise and vibration for the construction phase of the Proposed Development. The Principal Contractor will apply Best Practicable Means (BPM) and adhere to the Applicant's GEMPs. During operational phase, the proposed fixed plant to be installed and operated as part of the Proposed Development will be designed such that the derived Rating Level for the operational plant is no greater than the existing background sound levels at the nearby Noise Sensitive Receptors (NSRs). Compliance with appropriately derived sound level limits could be ensured by use of an appropriately worded planning condition. Other adverse effects on health and safety deriving from traffic will be controlled through adherence to a Construction Traffic Management Plan (CTMP). Overall, provided the proposed mitigation measures are followed according to the CNMP, GEMPs and CTMP, health and safety risks will be minimised to an acceptable

		level under NPF4 Policy 23. Therefore, the Proposed Development is in adherence to Policy 23.
Policy 29- Rural development	*The policy intends to encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area.* *The policy outlines that Development proposals that contribute to the viability, sustainability and diversity of rural communities and local rural economy will be supported which includes essential infrastructure.* *Development proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area. They should also consider how the development will contribute towards local living and take into account the transport needs of the development as appropriate in a rural location.*	As mentioned previously, the Proposed Development is of national importance and designated as a National Developments 1 and 3 within NPF4. The Proposed Development is key in delivering renewable energy from the Isle of Lewis to the rest of Scotland and beyond. The proposed development will utilise appropriate materials to ensure that the development respects the local character. Similarly, as mentioned previously, woodland planting will ensure the Proposed Development is adequately screened for visually sensitive locations. Moreover, earthworks bunds will also be used for similar purposes. The proposed development is key in facilitating renewable energy development on the Isle of Lewis. This will provide many benefits including economic development, job creation and other associated indirect benefits. It is therefore considered on balance that the proposed development aligns with Policy 29 of the NPF4.

3.3 LDP Policy

3.3.1 As highlighted, LDP policies are relevant to understanding the local planning context. LDP policies form part of the development plan alongside national planning policy (NPF4). The policies and compliance with the LDP are considered in this section.

3.3.2 The Outer Hebrides Local Development Plan was adopted in 2018 and supersedes the previous Local Development Plan (2012). Given the adoption date, the LDP references superseded national policy in the form of both the National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP). As previously stated in accordance with Section 24(3) of the 1997 act, should there be any conflict with any of the Local Plan policies, the NPF4 policies will prevail, given the later adoption.

3.3.3 The Outer Hebrides Local Development Plan Key Policies contained in the OHLDP are identified in Table 3-2 below.

Table 3-2: Relevant OHLDP Policies – Key Considerations and Relevance to the Proposed Development

Policy	Key Considerations	Relevance to the Proposed Development
Policy DS1: Development Strategy	*The principal policy objective is to direct appropriate resource based activity and ensure development has a high quality of siting and design suitable to a more open and rural setting.* *Development proposals for non-residential uses on green field sites must demonstrate a clearly justified need for the Proposed Development in that location* *All development proposals will be assessed against the capacity of the surrounding landscape to accommodate the development. Development proposals should avoid raised or high-level locations to minimise visual impact*	The Proposed Development is justified in using a green field site as addressed in both the site selection process (see Section 1.6) and in terms of justified need for the Proposed Development, which is asserted in Planning Statement Section 1.5. The visual impact of the development is a primary concern, which is addressed in the Landscape and Visual Impact Assessment (LVIA) (EIAR Chapter 5), in which mitigations both in terms of site selection and design are detailed. Site selection was carried out to minimise the risk of Landscape and Visual Impact, in combination with other negative externalities on areas such as biodiversity, soils, and woodland. Further information on site selection is details in Section 1.6 of this Planning Statement. The LVIA proposed several mitigation measures to reduce visual impact on the surrounding Boggy Moorland which is regarded as a sensitive receptor as well as on other sensitive receptors. The mitigation shielding measures, once established, would reduce Landscape and Visual Impact across the construction and operational life of the Proposed Development. The use of greenfield land is considered to be justified by the established need for the locational requirements that it presents.
Policy PD1: Placemaking and Design – minimising visual impact / siting concerns	*Development proposals for new buildings will be permitted where they satisfy the following criteria:* *a) SITING* - *avoid dominating the sky line* - *relate to the characteristics of the surrounding area* *b) DESIGN*	The Proposed Development relates to the construction of the converter station, substation and associated ancillary works. Given the nature of the proposal, the location, design and siting of the Proposed Development has been determined by the existing infrastructure and the operational requirements of the Applicant.

	- *ensuring design, scale, form and mass respects the surrounding built and natural environment* - *breaking up the design elements or by the use of appropriate materials* - *proportions, detailing, materials and colours, should be neutral or make a positive contribution to the character of the surrounding area* c) *AMENITY SPACE* d) *TOPOGRAPHY* - *Surplus materials from excavations should be re-graded, landscaped and utilised to backfill against areas of underbuilding and to create landform of natural appearance.* e) *NEIGHBOUR AMENITY*	The visual impact of the development is a primary concern, for which the SITING and DESIGN requirements of Policy PD1 as well as the general requirements of Policy NBH1 are considered. The specific impacts and proposed mitigations are addressed in the LVIA and are set out in detail in EIAR Chapter 13: Schedule of Mitigation. Topography impacts are addressed through detailed in Chapter 10: Geology and Soils (EIAR Volume 2). The Proposed Development would follow mitigation measures included in the CEMP and the OPMP which outline both impact mitigations during construction and restoration efforts to be undertaken post-construction, with the OPMP addressing the specific approach taken for the peatland which dominates the site. These are also set out in detail in EIAR Chapter 13: Schedule of Mitigation. Based on the above proposed measures taken, the Proposed Development is in accordance with Policy PD1.
Policy ED5: Minerals	*Proposals for borrow pits will be supported to allow the extraction of minerals near to or on the site of associated development (e.g. wind farm development or infrastructure projects) provided it can be demonstrated that there are significant benefits compared to obtaining the materials from local quarries and that criteria a) to i) above are met. These consents will be time-limited, tied to the proposal and must be accompanied by full restoration proposals and aftercare.* *Planning applications for mineral extraction must include detailed proposals for the phased restoration and aftercare of the site, including its intended after-use. Returning the land to a productive and beneficial use should take place at the earliest opportunity.*	The extraction of materials from borrow pits is required in the construction phase of the Proposed Development (see Planning Statement S1.3.5). As with OHLDP 2018 Policy PD1 TOPOGRAPHY, impacts are addressed through detailed in Chapter 10: Geology and Soils (EIAR Volume 2), and relevant mitigation measures are included in the CEMP and the OPMP, with the OPMP sets out the specific approach that is proposed to be taken in order to restore borrow pits. All proposed mitigation measures are set out in detail in EIAR Chapter 13: Schedule of Mitigation. Enabling works (borrow pits) were adjusted through an iterative design process to minimise their overlap with deeper peat as far as possible and measures to restore the affected peatland and heathland to its 'productive and beneficial use' as an important carbon sink and ecological habitat –Are included in proposed mitigation measures. The Proposed Development aligns with the relevant parts of Policy ED5.

Policy EI 1: Flooding	*Development proposals should avoid areas susceptible to flooding and promote sustainable flood management. Where sustainable flood management measures are proposed they should incorporate environmental improvements, for example natural methods such as restoration of floodplains, wetlands and water bodies, which can also contribute to reducing flood risk and help implement the proposals within the Outer Hebrides Local Flood Risk Management Plan.*	Chapter 9: Hydrology (EIAR Volume 2) scopes out the flood risk to the Proposed Development and the potential for direct and indirect impacts of the Proposed Development on off-site flood risk. As detailed in table 3-1 (NPF4 Policy) Policy 22 – Flood Risk and Water Management, flood risk is very low on the Site. All proposed mitigation measures are set out in detail in EIAR Chapter 13: Schedule of Mitigation and the application is supported by a Flood Risk Assessment that sets out that flood risk will not be unacceptable Flood risk mitigation measures will be designed into the Proposed Development, guided by the detailed drainage strategy and watercourse crossing design. Overall, the risk of flooding is considered as Not Significant. The Proposed Development complies with Policy EI1.
Policy EI 2: Water and Waste Water	*New developments will be required to adopt the principles of Sustainable Drainage Systems (SuDS). The Comhairle will support retrofitting of SuDS and the controlling of surface water through the use of permeable surfaces and green roofs.*	The use of SuDS and additional surface water controls at the construction and operational phases of the Proposed Development are detailed in Chapter 9: Hydrology (EIAR Volume 2). All proposed mitigation measures are set out in detail in EIAR Chapter 13: Schedule of Mitigation. The proposed mitigation methods are summarised below: Construction phase SuDS are detailed in the Pollution Prevention Plan (PPP) and the final CEMP, as required, to provide a surface water management and treatment train that would mitigate potential adverse impacts on the hydrology of the Site and surrounding areas during the construction phase of the Proposed Development. A site maintenance programme regarding site plant and infrastructure would be implemented by the Principal Contractor and a maintenance schedule for SuDS measures at the site would be submitted to CnES for their approval. During the operational phase, surface water runoff will be managed using. SuDS designed to prevent sediment and pollutants from reaching nearby water bodies, incorporating features like silt fences, sediment traps, and filtration measures where needed. Site platforms of the converter and substation compounds are to be

		constructed out of permeable granular stone to attenuate flows. A drainage strategy for the site has been prepared by Mott Macdonald LLP (2024) and is presented as Technical Appendix 2.1 of the EIAR. Based on the above measures, the Proposed Development would adhere to Policy EI2.
Policy EI 3: Water Environment	*Development proposals should avoid adverse impact on the water environment. All proposals involving activities in or adjacent to any water body must be accompanied by sufficient information to enable a full assessment to be made of the likely effects, including environmental effects, of the development.*	Potential adverse impacts on the water environment are detailed in Chapter 9: Hydrology (EIAR Volume 2). All proposed mitigation measures are set out in detail in EIAR Chapter 13: Schedule of Mitigation. The EIAR finds the hydrological effects of the Proposed Development with these mitigations in place to be Minor and Not Significant – key measures are summarised below: Works taking place near watercourses would be undertaken in accordance with SEPA guidance and in line with the requirements of the Water Environment (Controlled Activities) (Scotland) Amendment Regulations 2021 (CAR) to prevent or reduce adverse effects to the watercourse. During construction, the CEMP will detail measures used to ensure that the release of sediments or pollutants to the surrounding environment is avoided. These measures will be prepared in line with SEPA guidance, ensuring that, despite several High sensitivity watercourses within the Site, potential impacts on downstream hydrology are reduced to Minor and Not Significant in EIA terms. During the operational phase, environmental effects are similarly low, facilitated by the attenuation and treatment of surface waters in permanent detention basins as per the detailed drainage strategy (Technical Appendix 2.1, EIAR Volume 4). Therefore, the Proposed Development adheres with Policy EI3.
Policy EI 5: Soils	*Development should be designed to minimise adverse impacts on soils caused by ground disturbance, compaction or excavation. Developers should assess the likely effects associated with any development work on soils,*	The importance of the peatland which comprises much of the site soil composition is recognised and addressed through a series of mitigation measures. Impacts are addressed through detailed in Chapter 10: Geology and Soils (EIAR Volume 2), and relevant mitigation measures will be included in the CEMP and the

	particularly machair soil, peat, or other carbon-rich soils and associated vegetation, and aim to mitigate any adverse impacts arising. Where disturbance of peat or other carbon-rich soil is likely to give rise to significant emissions of carbon dioxide, developers may be required to justify the location of the Proposed Development and to show how emissions will be minimised. *For Major developments, minerals and some large scale renewable energy proposals (see Supplementary Guidance for Wind Energy Development), development will only be permitted where it has been demonstrated that unnecessary disturbance of carbon rich soils such as peat and any associated vegetation is avoided. A peat survey must be submitted which demonstrates that areas of deepest peat have been avoided and the impacts on carbon-rich soils and associated habitats minimised. Where required, a peat management plan must also be submitted along with any planning application which demonstrates best practice in the movement, storage, management and reinstatement of soils.*	OPMP, with the OPMP addressing the specific approach taken for the peatland which is affected by the Proposed Development footprint as well as borrow pits. All proposed mitigation measures are set out in detail in EIAR Chapter 13: Schedule of Mitigation. These measures are designed to restore the affected peatland and heathland to its original function as an important carbon sink and ecological habitat – these functions are recognised as an essential role of the surrounding land and will be treated as such throughout construction and operational phases of the Proposed Development The Proposed Development will adhere to the requirements of Policy ED5 as much as possible, although it is recognised that unavoidable damage to peatland is required to build the Proposed Development, as addressed in the Site Selection process and underscored by the Need For Development. Namely, the Proposed Development 'justifies' the carbon implications of damaged peatland during its construction by supporting clean energy generation and carbon reduction targets on a wider scale during its operation (Planning Statement SS1.5-1.6).

Policy EI 8: Energy and Heat Resources	*The Comhairle will support proposals that contribute to meeting the targets and objectives of the National Planning Framework, the Climate Change Act, and the National Renewables Infrastructure Plan in relation to electricity grid reinforcement, infrastructure and renewable energy generation. Development proposals for all scales of onshore wind energy development will be assessed against the Supplementary Guidance for Wind Energy Development* *Proposals for all other renewable energy projects and oil and gas operations (including land based infrastructure associated with offshore projects) will be required to demonstrate all the following:* *appropriate location, siting and design including the technical rationale for the choice of site;* *no significant adverse impact (including cumulative) on: landscape, townscape and visual aspects; natural, built and cultural heritage resources; the water environment; peatlands; aviation, defence and telecommunications transmitting and receiving systems, e.g., broadband; public health and safety, and amenity (including noise); neighbouring land uses, transport management and core paths;* *appropriate decommissioning and site reinstatement arrangements;* *phasing arrangements, where appropriate; e) the contribution towards meeting national energy supply targets and local economic impact.*	As set out in the OHLDP *"The Comhairle wishes to capitalise on the significant renewable energy generation potential in and around the Outer Hebrides"*. In this regard, the Proposed Development would facilitate the transmission of energy from renewable sources and as such support the targets and objectives set out in the NPF4, as well as the Scottish and UK Governments. As set out in Section 1.6 of this Planning Statement the rationale for selecting the location and siting of the Proposed Development. Furthermore, it is considered that the Proposed Development would not result in significant adverse impacts. As such it is considered that the Proposed Development would conform with Policy EI 8 of OHLDP.

Policy NBH1: Landscape	*If it is assessed that there will be a significant landscape or visual impact, the applicant will be required to provide mitigation measures demonstrating how a satisfactory landscape and visual fit can be achieved.*	It is recognised that there could be some visual impacts resulting from the Proposed Development. The Proposed Development has aimed to reduce the visual impact where possible and has been guided by siting design and the operational requirements of the site. As set out in the EIAR, there are several mitigation measures proposed: – Earthworks for screening purposes; – Planting of native trees and shrubs to increase the effectiveness of screen bunding and visually reinforce existing woodland near Lews Castle ground. Overall, Policy PD1 and requirements of Policy NBH1 have been considered when designing the proposed development, and relevant mitigation measures have been applied to achieve a satisfactory landscape and visual impact visual fit in as far as is reasonably possible having regard to the locational and design requirements of the proposed essential infrastructure.

Policy NBH2: Natural Heritage	*Where there is good reason to suggest that a European Protected Species (EPS)* is present on site, or may be affected by a Proposed Development, the Comhairle will require any such presence to be established and, if necessary, a mitigation plan provided to avoid or minimise any adverse impacts on the species, prior to determining the application.* *Planning permission will not be granted for development that would be likely to have an adverse effect on a species protected under the Wildlife and Countryside Act 1981 (as amended in Scotland) unless the development is required for preserving public health or public safety. For development affecting a species of bird protected under the 1981 Act there must also be no other satisfactory solution.*	Preliminary Ecological surveys were undertaken in January 2023, August 2023, and September 2024. No records of any EPS were identified during the field surveys, although suitable habitat for otter is present. Species Protection Plans (SPPs) would be followed during construction of the Proposed Development. In implementing the SPPs, and where required pre-construction protected species surveys would be undertaken as close to the construction period as possible, and no more than three months before the start of the work. Given the findings in the surveys, it is deemed unlikely that the Proposed Development have an adverse effect on any species protected. The Proposed Development therefore conforms with Policy NBH2.

Policy NBH3: Trees and Woodland	*The policy sects out that the Comhairle will safeguard individual trees, groups of trees and woodland areas where they are considered important for amenity or their cultural or historic interest by establishing Tree Preservation Orders.* *The policy also outlines that there is a strong presumption against the removal of established individual trees and woodland of mixed native species which have a landscape and amenity value and/or contribute to nature conservation, unless removal would achieve significant additional economic, environmental or social benefits.* *Furthermore, the policy also recognises that in order to minimise any adverse impacts on amenity, biodiversity or landscape value, developers will be required to incorporate existing trees and woodland into developments through sensitive siting and design. Where loss is unavoidable, appropriate replacement planting should be sought through the use of planning conditions or through a legal agreement if appropriate.*	There are no Tree Preservation Orders or protected woodland habitats within the Site. There are also no established individual trees or woodland of mixed native species with any landscape and amenity or natural value. The only woodland on the Site is low-lying mixed native young trees and shrubs, the removal of which is established to be justified by the significant additional economic and environmental benefits offered by the Proposed Benefit. Existing woodland is enhanced by further planting to build visual screening for the development. Any sensitive ecological or ornithological receptors contained within the Site are addressed in separate sections of this Planning Statement, and suitable mitigation measures are in place for these. Therefore, the Proposed Development does not contravene OHLDP Policy NBH3.

Policy NBH5: Archaeology	*Development proposals that may adversely impact upon the cultural significance of scheduled archaeological remains or the integrity of their settings will require to be supported by:* *an assessment of the significance of any heritage assets which are affected by the development; and* *the measures that will be taken to mitigate any adverse effect on the archaeological significance; and* *the measures that will be taken to preserve and protect the special interest of the heritage asset; and* *a justification that demonstrates the social; economic; environmental, safety or other imperative reasons of overriding public interest that would outweigh any adverse effect which cannot be mitigated.*	As previously set out it is noted due to the location of the site in relation to Cnoc na Chroich chambered cairn and other prehistoric scheduled monuments there is a potential for the discovery of archaeological remains within the Site. The Applicant is committed to ensuring compliance with the policy and would carry out the relevant surveys, including a WSI, prior to construction commencing on site. Furthermore, in the event of any artifacts being found during the construction phase, the applicant would carefully document this in accordance with the details set out within the WSI. With the above measures in place, the Proposed Development can be regarded as in adherence with OHLDP Policy NBH5.
Policy NBH6: Historic Areas	*Any development proposal must preserve and, where appropriate, seek to enhance Lews Castle and Lady Lever Park as described in the Inventory of Gardens and Designed Landscapes.*	Whilst the Proposed Development would not directly impact any historic areas it is recognised that there could be a negotiable impact in terms of visual amenity upon Lews Castle and Lady Lever Park. As previously set out the site (green line shaded) is 250m southwest of the Lews Castle and Lady Lever Park. No adverse impacts are predicted; however, the Proposed Development's Landscape and Visual Impact mitigation measures seek to enhance the existing visual screening between the Site and Lews Castle and Lady Lever Park by planting trees along the northern edge of the site. These measures are detailed in the LVIA. Overall, the visual amenity of Lews Castle and Lady Lever Park would be preserved by enhancements to visual screening. Any residual impact should be weighed against the public benefits of the Proposed Development, specifically facilitating energy transmission from renewable sources. There is no significant tension between the Proposed Development and OHLDP Policy NBH6 subject to the proposed mitigation.

4. ENERGY POLICY REVIEW

4.1 National Energy Policy Review

4.1.1 Government renewable energy policy makes clear that there is an urgent need for new and upgraded electricity transmission infrastructure to enable an increase of renewable energy generation. This aim is supported through several energy policy documents. As statements of national policy these are important material considerations to the determination of the current application.

The UK Energy White Paper

4.1.2 The UK Government Energy White Paper 'Powering our Net Zero Future' sets out that: "*electricity is a key enabler for the transition away from fossil fuels and decarbonising the economy cost-effectively by 2050*". It adds a key objective is to "*accelerate the deployment of clean electricity generation through the 2020s*". Electricity demand is forecast to double by 2050, which will "*require a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target*".

4.1.3 The White Paper sets out that the scale of change required to tackle to climate change is at a crucial point. The Paper therefore anticipates that there is a need for a fundamental, global response to tackling climate change issues. Chapter 1 of the White Paper outlines the likely change in the nature and volume of electricity generation.

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

4.1.4 The Climate Change (Scotland) Act 2009 set ambitious and, for the time, world leading greenhouse gas emissions reduction targets, including a target to reduce emissions by 80% by 2050. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 subsequentially amends the 2009 Act and sets targets that are even more ambitious and challenging. These targets reflect the recommendations of the Committee on Climate Change (CCC) for a net zero greenhouse gas emissions target by 2045, with interim targets for a 75% reduction by 2030 and 90% by 2040.

4.1.5 From these changes in targets, there are two primary observations that arise. Firstly, the 2019 Act has significantly increased the target required to be met by 2030; the Scottish Parliament increased the requirement from a 70 to 75% reduction by 2030. This target recognises the urgent response and action that is required is a direct response to the declarations of the climate change emergency.

4.1.6 Secondly, the legislation also introduced annual targets which clearly illustrate the speed of change that is required, particularly prior to 2030. The targets show that, up to 2020, the annual percentage reduction required was 1%, which then increases by 1.9% for each year between 2020 and 2030. This represents a near doubling of the response.

The Update to the Climate Change Plan (2018-2032)

4.1.7 Scottish Government's Climate Change Plan (CCP) '*Securing a Green Recovery on a Path to Net Zero (2018 – 2032) - update*' was published on 16 December 2020. The CCP was updated to address the revised net zero targets, which are ultimately set to end Scotland's contribution to climate change by 2045. The timeframe covered by the CPP is in parallel to the deadline for Government's commitment to reduce greenhouse gas emissions by 75% by 2030 (compared with 1990 levels).

4.1.8 A key part of the CCP is the green recovery, which states: "*It is essential that a recovery from the pandemic responds to the climate emergency and puts us on a pathway to deliver our statutory climate change targets and a just transition to net zero, by ensuring our actions in the immediate term are in line with our long-term goals…"* and "*… The Scottish Government has been clear in its commitment to securing a just and green recovery, which prioritises economic, social and environmental well-being, and responds to the twin challenges of the climate emergency and biodiversity loss*".

4.1.9 The CCP update sets the context in terms of electricity systems, stating that "*... further policies to continue the rapid growth in renewable generation over the past 20 years, moving from a low to a zero-carbon electricity system...".*

4.1.10 Electricity is further addressed in Chapter 1 Paragraph 3.1.4 of the plan, which recognises that, as Scotland's places and economy transition to net zero, the growing and increasingly decarbonised electricity sector "*is critical to enabling other parts of our economy to decarbonise – notably transport, buildings and industry*".

4.1.11 Section 2.5 recognises the coordinated approach that is needed and refers to the planning system and the forthcoming NPF4. Planning is seen as a "*key delivery mechanism for many of the policies within this climate change plan update, across all sectors*".

The Global Climate Emergency - Scotland's Response (2019)

4.1.12 The former Climate Change Secretary Roseanna Cunningham made a statement to the Scottish Parliament on the 14th of May 2019 entitled 'The Global Climate Emergency - Scotland's Response'. In the statement, the Scottish Government declared a climate change emergency and set out that "*the next National Planning Framework and review of the Scottish Planning Policy will include considerable focus on how the planning system can support our climate change goals*".

Programme for Government (2024)

4.1.13 The Programme for Government is published every year by the Scottish Government at the beginning of September and sets out the actions they will take in the coming year and beyond.

4.1.14 The Programme for Government (2024) includes a commitment to publish the Final Scottish Government Energy Strategy. The strategy aims to improve the planning and consenting process for renewable energy and electricity transmission. This includes enhancing the consistency and speed of the planning process for energy development, ensuring adequate resources to meet demand, and reducing timescales for decisions.

Draft Scottish Government Energy Strategy (2023)

4.1.15 The Scottish Government published the Draft Energy Strategy and Just Transition Plan on 10th January 2023. Chapter 3 'Energy Supply' states that the Scottish Government, "*will place climate and nature at the centre of our planning system in line with the Revised National Planning Framework 4, making clear our support for all forms of renewable, low-carbon and zero emission technologies, including transmission and distribution infrastructure*".

4.1.16 Section 3.2 of the Strategy 'Reducing our reliance on other energy sources', outlines that in alignment with NPF4 the Scottish Government "*encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure"*.

British Energy Security Strategy

4.1.17 The British Energy Security Strategy outlines how the UK will accelerate homegrown power for greater energy independence. The Strategy acknowledges the need to accelerate the supply of clean affordable energy. In order to lower the total costs, it is stated that there is a need to reduce the timelines for delivering strategic onshore transmission network infrastructure.

Scotland's declaration of climate emergency

4.1.18 On April 28th, 2019, the First Minister of Scotland declared a climate emergency at the Scottish National Party conference. As part of the announcement, new legislation was announced which commits Scotland to being carbon neutral by 2050.

The Climate Chance Committee Report to Scottish Ministers

4.1.19 The Climate Change Committee Report, published in March 2024 outlines the progress Scotland has made in reducing emissions. A recommendation within the report is made in regard to ensuring that the targets for Scotland set out in the Energy Strategy and Just Transition Plan (ESJTP) are met and that the UK wide objective of a decarbonised electricity supply by 2035 is achieved. It is further noted that this must include working closely through the Connections Action Plan and the Transmission Acceleration Action Plan to accelerate the delivery of energy infrastructure in Scotland.

Government Policy on Renewables

4.1.20 Within the Labour Government's renewable policy, recognition is given to the need to upgrade the existing transmission network in order to accommodate future renewable development. It is stated that, "*with grid connection dates not being offered until the late 2030s, important business and infrastructure investment is being stalled or lost overseas. Labour will work with industry to upgrade our national transmission and rewire Britain*."

The Clean Power 2030 was published in December 2024 by the UK national government. The report outlines the UK's strategy to transition to a clean electricity supply by 2030. In relation to electricity networks, it is acknowledged that: Around twice as much new transmission network infrastructure will be needed in the nation's grid by 2030 as has been built in the past decade.

International Energy Policy Review

4.1.21 Alongside the above national policies there are also several other relevant international agreements and policies this includes:

4.1.22 Paris Agreement- The Paris Agreement is a legally binding international treaty on climate change which includes commitments from all countries to reduce their emissions and work together to adapt to the impacts of climate change. The agreement sets out a number of longer-term goals which includes substantially reducing global greenhouse gas emissions to hold global temperature increase to well below 2 degrees Celsius above preindustrial levels and pursue efforts to limit it to 1.5 degrees Celsius above pre-industrial levels. It is recognised that this would significantly reduce the risks and impacts of climate change.

4.1.23 The Intergovernmental Panel on Climate Change (IPCC)- The IPCC is a United Nations body assessing the science related to climate change. The IPPC provides regular assessments of the scientific basis of climate change, its impact and future risks and options for adaptation and mitigation. An IPCC report titled Strengthening and Implementing the Global Response, provides an overview of the feasibility of mitigation and adaptation options in in regard to mitigation pathways consistent with limiting warming to 1.5 degrees Celsius above pre-industrial levels. It is however acknowledged that the feasibility of such sources including solar and wind power does depend on grid adaptations.

4.1.24 The Sustainable Development Goals Report- The Sustainable Development Goals Report was published by the United Nations in June 2024. The report highlights 17 goals which have been adopted by the UN member states. Goal 7 specifically relates to energy and highlights the increase share of renewable energy within the world's energy consumption. It is further outlined that the world's capacity to generate renewable power is expanding at an unprecedented rate, which presents an opportunity to triple global capacity by 2030.

4.1.25 COP28- COP 28 UN Climate Change Conference was held in Dubai in November 2023- December 2023. The conference included some 85,000 heads of state and government. COP28 was particularly momentous in that it marked the first 'global stocktake' in relation to the efforts to address climate change under the Paris Agreement. Given the slow progress to reduce greenhouse gas emissions, there was a call on governments to speed up the transition away from fossil fuels to renewables.

4.2 Energy Policy Review Conclusion

4.2.1 The Proposed Development is well aligned with National Energy Policy by supporting the following National Energy Policy objectives:

- The Proposed Development enables an increase in renewable energy generation by expanding the grid connections to Lewis and the wider Western Isles, enabling large-scale wind energy generation opportunities through the systematic upgrade of transmission and distribution infrastructure.
- The Proposed Development accelerates the process of decarbonisation of the economy to achieve net zero targets, through an expansion of large-scale infrastructure, supporting clean energy generation as we work towards a "zero-carbon electricity system" and reduce reliance on non-renewable energy sources.
- The Proposed Development aligns to long-reach net zero and carbon reduction goals as part of the 'Pathway to 2030' projects proposed by the Applicant, such as those posed by the Update to the Climate Change Plan (2018-2032) and Scottish Government's CCP (2018 – 2032).

4.2.2 The Proposed Development, by aligning with long-reach National net zero and carbon reduction goals, effectively contributes towards achieving the UK's obligations to international treaties such as The Paris Agreement; The UN Sustainable Development Goals (Goal 7 – clean energy).

5. CONCLUSION

5.1 Policy Summary

National Energy Policy

5.1.1 The Proposed Development is required to develop electricity transmission across the Lewis and the wider Western Isles, supporting the Applicant's obligations under Section 9(2) of the Electricity Act to develop and maintain an efficient, co-ordinated and economical system of electricity distribution.

5.1.2 National energy policy demonstrates that the Proposed Development would also support the sustainable goals of Net Zero as outlined within the UK Energy White Paper and updated CPP. The Proposed Development supports reduction in carbon emissions by facilitating continued renewable energy generation mentioned within The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. The Proposed Development also aligns well with the Draft Energy Strategy.

5.1.3 Overall, the energy policy and climate change legislative context are a significant material consideration which must be considered in the determination of this planning application, regarding the needs case for replacing failing electricity infrastructure and maintaining the existing transmission network, as set out in NPF4. To meet the carbon reduction targets, set out in the Climate Change Plan, and support low carbon and zero emissions technologies per the Energy Strategy, it is imperative that transmission infrastructure is well maintained and reliable.

5.1.4 It is considered that the benefits from the Proposed Development, as a key infrastructure project which bolsters electricity transmission network, provide strong justification for the Principle of Development. Any local impacts of the development which will be mitigated where possible throughout the construction and operational phases and this is addressed in Section 3 of this Statement.

National Planning Policy

5.1.5 The Proposed Development is a strategically important national transmission project, essential to facilitating renewable energy and electricity transmission in the Outer Hebrides. The proposed development falls under National Development in the NPF4, due to its importance in supporting renewable energy generation and transmission.

5.1.6 National Planning Policy is now underpinned by a mandate to more to a '*net zero economy and society'*. The Proposed Development is key in facilitating the transmission of renewable energy across Lewis and norther Scotland and therefore aligns with policy aims and will contribute towards achieving the statutory outcomes outlined within NPF4.

5.1.7 Whilst it is acknowledged that there is a slight tension between the proposed development and Policy 4 of NPF4, mitigation measures will be adhered to alongside the provision of a BNG assessment. It is further considered that the clear public benefits and the key role the proposed development plays in reducing carbon emissions, on balance, provides significant environmental benefits.

Local Planning Policy

5.1.8 The Proposed Development is a strategically important national transmission site, essential for the facilitation of renewable energy on the Isle of Lewis. The Proposed Development would support the ambitions of Policy EI8 in facilitating the transmission of renewable energy. It is considered that overall, the Proposed Development aligns with all relevant policies within the OHLDP.

5.2 Overall Conclusion

5.2.1 The Proposed Development would meet the aims and objectives of NPF4 and the OHLDP. It is acknowledged that there are some limited tensions with the precise wording of some policies, mainly in respect of a loss of Class 1 peatland. However, when considered in the round and with the adoption of the proposed mitigation measures, there is overwhelming Development Plan and National Policy support for the Proposed Development, which outweighs these tensions.

5.2.2 In weighing up the support for the proposed Development against its environmental impacts, in the context of the Scotland's renewable energy and climate change targets and ambitions, energy policies and planning policies, account needs to be taken of the weight that is to be placed in addressing the climate emergency and the nature crisis in the balance of planning judgement. There is no effect that is of such a significance that it would outweigh the significant benefits of the Proposed Development in meeting the relevant parts of the National Spatial Strategy and the relevant Regional Spatial Priorities for the Islands. Any significant effects contained to the extent that they are acceptable overall in the context of the benefits the proposed Development will bring in terms of its contribution to renewable energy and climate change targets.

5.2.3 Overall, the Proposed Development is considered to accord with the development plan and national policies when considered holistically. There are no material considerations which point toward the application being refused.

5.2.4 This Planning Statement has given due regard to the development plan and all relevant material considerations. It is concluded that the balance of these considerations supports the grant of planning permission in principle. The Proposed Development would support the governments' ambitions to reach net zero, it would conform with National Planning and Energy Policies and with the overreaching the national spatial strategy of the NPF4. There are no other material considerations that would outweigh the clear policy support for the Proposed Development.