

Objection to the proposed photovoltaic solar farm on Cumbrae 23/00114/PP

29 March 2023



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Introduction

In line with the overwhelming opposition of the local community, Cumbrae Community Council objects to the proposed solar farm on the Isle of Cumbrae, which offers no benefits whatsoever to the community, only negative impacts on a local beauty spot and an important habitat. Even the power generated will be taken off the island and connected to the national grid – it will not benefit the island.

We stress that we are not against renewable energy generation on the island, or even solar power on the island, but we believe any such proposals should involve an assessment of need and proper consideration of the possible options and locations. This poorly-thought out and ill-conceived proposal, which has been hanging over the community of this small island for 7 years, has undertaken no such assessment.

The first application for a 5MW solar farm was submitted in 2016. 95% of the online comments lodged with North Ayrshire Council were objections. In 2022 the same scheme was submitted again. This time there were 63 online comments lodged with North Ayrshire Council, just 2 of which were in favour. In addition, there were more than 200 paper submissions, the overwhelming majority of which were objections. This was a huge response from a small island community. The application was withdrawn without explanation.

In 2023, this, the third application was submitted, but this time with a 40% increase in power generation from 5 to 7MW, and with an additional 12MW of battery storage. This takes the development to 19MW, just 1MW below the level that would make this a major application, requiring a statutory public consultation process. More than 300 comments have been submitted to North Ayrshire Council, just 5 of which are in favour.

This industrial-scale installation includes 12,000 panels up to 4m tall, 12 buildings up to 5.3m high, a 1.5km long, 2m high fence with 31 CCTV masts and a communications tower. At an enormous 15.3 hectares, equivalent to 22 football pitches, this would take up 1.3% of the total area of our small island. To give a comparison, on Arran, this would be the equivalent of allowing the construction of a 565 hectare solar farm at the top of Goat Fell.

If this proposal is permitted by North Ayrshire Council, it would create an unfortunate precedent. If this is allowed, why not other industrial developments on Cumbrae or on Arran?

The detail of our objection is set out below.

Policy changes since 2016

It is important to state that since the first proposals for the solar farm were submitted in 2016, the policy landscape has changed significantly, and so any belief by the applicant that "...the principle of development of a solar farm on the site is therefore already established" is incorrect. Previous considerations should not be taken into account when determining this new application:

- On 11 January 2023, National Planning Framework 4 (NPF4) was approved by the Scottish Parliament, introducing the concept of a "nature emergency" and placing a greater importance on preventing loss of biodiversity and requiring that developments contribute to nature, stating "Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats".
- Local Development Plan 2 (LDP2) was adopted by North Ayrshire Council in 2019, introducing a balanced approach to support rural and island economies while protecting their outstanding natural environments.

• The Carbon Neutral Islands project was introduced by the Scottish Government in 2022, with Cumbrae selected to be one of the six islands in this initiative, which crucially, is intended to be "community-led".

In addition, in England, there has been a shift away from permitting solar farms on agricultural land due to concerns about the loss of food producing capacity and its impact on food security. This has pushed some applicants into Scotland instead ¹.

The application is incomplete and, in places, incorrect

The documents submitted by the applicant are incomplete and the information they contain is, in places, incorrect. Some of the more fundamental problems are set out below:

- There is no explanation of how the solar farm will be connected to the national grid. Will it be an above ground connection on pylons? What route will it take? Whose land will it cross? In the seven years since the original application was submitted, the applicant has been unable, or unwilling, to answer these very basic questions. It is difficult to understand why this is, as they must surely have considered it. It seems possible that they do not want the community to know until after they have received planning permission and it is too late to stop. North Ayrshire Council have suggested that this may fall within permitted development rights and might not need planning permission at all. However, Policy 18b of NPF4 states: 'Development proposals will only be supported where it can be demonstrated that provision is made to address the impacts on infrastructure.' and it should be noted that other similar applications for solar farms do include this information.
- There are no elevations or sections of the solar panels themselves showing how tall or wide they are, what the supporting structure is, how far above the ground they are or what colour or materials the various components are.
- There are no details about the design of the perimeter fence or entrance gates, the communications tower or the CCTV installations. For example, how tall is the communications tower? What does it look like? The proposed block plan that forms part of the application refers to a detail drawing of the 'comms tower', but no such drawing has been included in the application.
- No elevations, dimensions, colours or materials have been submitted for the 6 BESS transformers or the 12 power converting units.
- The DNO substation and the switchgear station appear to have either been mislabelled or the drawings are incorrect, as the plans and the key on the Proposed Block Plan do not match the elevations.
- All the elevations submitted state that the proportions and sizing shown are "approximate" and the colours and materials are "indicative". It is not clear what this means in terms of an application for planning permission or for the opportunity for consultation.
- The Transport & Access Assessment refers to "potential passing provision locations" on the core path. Does this mean they are intended or not? What impact would they have? What further loss of habitat would they require?
- The application does not detail the inevitable changes to topography that will be necessary to accommodate HGV and other vehicle movements and the installation of buildings and 12,000 solar panels on a very irregular, uneven and undulating site.

¹ <u>https://www.theguardian.com/environment/2022/nov/17/de-facto-ban-on-solar-farms-in-england-to-</u> <u>continue-therese-coffey-signals</u>

These are fundamental omissions from what is supposed to be a detailed, not outline application. These are not minor issues that can be dealt with as conditions, they are major parts of the application, the detail of which should have been part of the consultation exercise.

In addition, the Preliminary Ecological Appraisal was withheld by North Ayrshire Council until 15 March, with no notification of this given within the planning documents. When it was finally published, following questions by Cumbrae Community Council, North Ayrshire Council refused to give an extension to the consultation period to allow proper consideration of this document.

Furthermore, the Preliminary Ecological Appraisal was recorded as having been received by North Ayrshire Council on 10 Feb 2023. The document itself is dated 9 February 2022, before the 12MW of batteries were added to the proposal (and so the potential impact of those batteries is not referred to). It states: "If this report is to be submitted for regulatory approval more than 12 months following the report date, it is recommended that it is referred to EnviroCentre Ltd for review to ensure that any relevant changes in data, best practice, guidance or legislation in the intervening period are integrated into an updated version of the report." No such updated version has been provided, and so this report must be considered out of date.

Ecology

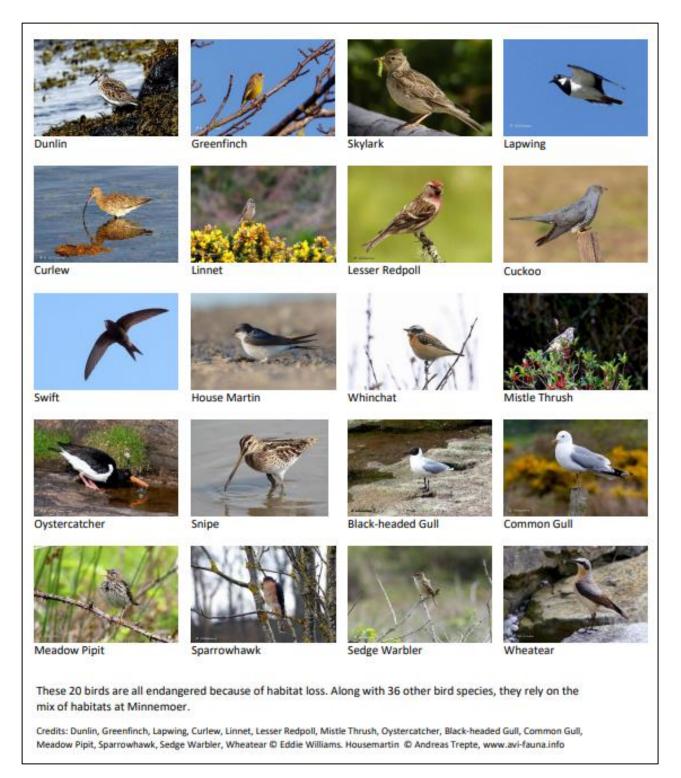


Above: The proposed site for the solar farm viewed from the core path

The Planning Statement submitted by the applicant describes the site as "scrubland with no specific identified use".

It is in fact a combination of agricultural land used for grazing cattle (as shown above) and a number of habitat types regarded as priority habitats in the Scottish Biodiversity List, including upland heathland and upland flushes, fens and swamps. These habitats are important at a national (Scottish) level.

These habitats create an important site where at least 20 endangered species of bird have been recorded by members of the local community and registered with RSPB, and a total of 56 species in total.



Above: Red and amber listed bird species recorded at Minnemoer

See Appendix 1 for full details of bird species recorded at the site.

The Preliminary Ecological Appraisal submitted by the applicant was based on a survey undertaken on just one day, 12 Jan 2022. Such surveys are best undertaken between April and September. It identified just one red-list species of bird. It states: "Five Dunlin (Calidris alpina) were flushed within the site and adjacent study area. Dunlin are on the Birds of Conservation Concern (BoCC) red list and on the Scottish Biodiversity List and therefore are considered of national importance." We note that the Scottish Wildlife Trust has objected to the proposals, stating: "When the site was resurveyed in 2015 on behalf of North Ayrshire Council its quality was confirmed and it was recommended that it should be combined with an adjacent area to form the Barbay Hill and Ballikillet Wood LNCS. During the 2015 survey of Barbay Hill significant plant species recorded were Royal Fern, Marshwort, Bog Pimpernel and Whorled Caraway." And that: "the proposer has not demonstrated any benefits associated exclusively with this particular site that would outweigh normal policy restrictions".

NPF4 Policy 11e ix states: "...project design and mitigation will demonstrate how the following impacts are addressed: ... biodiversity including impacts on birds;"

The Scottish Wildlife Trust strongly support the suggestion that an Ecological Impact Assessment (EcIA) should be conducted, as proposed in the applicant's own Extended Vegetation Survey (Summary and paragraph 4.2). Such an Ecological Impact Assessment should form part of the process of determining whether planning permission should be granted and should not be dealt with as a condition.

Environmental Impact Assessment

An Environmental Impact Assessment (EIA) could be required for this development, as the proposals fall within the scope of Schedule 2 of the Town & Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.

An EIA screening opinion was requested from North Ayrshire Council by the applicant. North Ayrshire Council gave the opinion that no EIA would be required, despite strong representations by Cumbrae Community Council Community. Given the sensitivity of the site and the scale of the proposals relative to the size of the island, Cumbrae Community Council believe very strongly that an EIA should be required. This would allow proper assessment of whether this is the most suitable location for such a development. Without an EIA, no justification will be required for the sensitive location the applicant has selected and there will be no assessment of possible alternative sites that may have less significant environmental impacts.

This position is supported by Councillor Alan Hill, Councillor Tom Marshall, Councillor Eleanor Collier and Councillor Todd Ferguson, who describe the scoping opinion as "misjudged" and call for it to be re-examined.

It should be noted that North Ayrshire has 12% of all vacant and derelict land in Scotland, one of the highest proportions of any Scottish Local Authority². The two solar farms that are being developed by North Ayrshire Council itself are both on former landfill sites³.

Policy 1 of the Local Development Plan states requires: "...a demonstrable specific locational need including developments for renewable energy production i.e. wind turbines, hydroelectric schemes and solar farms."

² https://www.north-ayrshire.gov.uk/Documents/PropertyServices/InfrastructureDesign/vacant-and-derelict-land-strategy-draft-2023-2027.pdf

³ https://www.north-ayrshire.gov.uk/news/Contract-awarded-for-development-of-two-North-Ayrshire-Solar-PV-farms.aspx

Site selection

The site appears to have been selected simply because of a deal between the landowner and the applicant. We are not aware of the applicant considering any alternative locations where the impact might have been less significant.

The site is a sensitive one, adjacent to the highest point viewing and picnic area, an important walking route for residents and tourists, and within the Great Cumbrae Special Landscape Area and the Barbay Local Nature Conservation Site. The Planning Statement also states: "In addition to these designations, the LDP identifies the site as part of a potentially vulnerable area (PVA ref: 12/02), falls within the countryside and an area of significant protection."

The application also identifies the potential for loss of aquatic invertebrates and loss or degradation of wetland priority habitats on the site.

No compensatory planting mitigation or enhancement measures have been proposed by the applicant.

Policy 15 of the Local Development Plan states: "We will only support development which affects Special Landscape Areas where it would not have an unacceptable impact on their special character, qualities and setting."

Clearly the proposed development would have a very significant and entirely unacceptable impact on this important location.

Policy 14 states: "All proposals should seek to protect, create, enhance and/or enlarge our natural features and habitats which make up our green and blue infrastructure (including open space), ensuring no unacceptable adverse environmental impacts occur."

Policy 29 states energy infrastructure development should: "have no unacceptable adverse environmental impacts".

Tourism

Locating an industrial-scale development on this site would be detrimental to the fragile island economy which is heavily dependent on tourism for its income.

100,000 passengers a month use the ferry to come to Cumbrae in July and August, the vast majority of whom are tourists. The Draft Isle of Cumbrae Economic Baseline Report published by NAC in 2022, states that a fifth of all employment on the island is involved in tourism, accounting for a quarter of local GVA. It highlights the fact that the island was hit by the impact of COVID and that this will "likely worsen the already difficult position regarding the level of income deprivation on the Isle of Cumbrae the incidence of which, in the latest data, is 29% higher than the Scottish average level."

Policy 8 of the Local Development Plan states that applications on Cumbrae will be supported where they: "...avoid unacceptable adverse impacts on the environment, amenity or the tourism offer of the area."

Policy 29 states: "We will support development proposals for energy infrastructure development, including wind, solar, tidal, cropping and other renewable sources, where they will contribute positively to our transition to a low carbon economy and have no unacceptable adverse environmental impacts."

Carbon Neutral Islands project

On 17 May 2022 Rural Affairs and Islands Secretary Mairi Gougeon announced that Cumbrae has been selected to be part of the Carbon Neutral Islands project. The Scottish government has committed to supporting Cumbrae to become carbon neutral by 2040, a project that will align with a Scotland-wide net zero initiative and contribute to the Scottish government's 2045 net zero commitment.

The Carbon Neutral Islands project is now underway and will in time determine whether there is a need for renewable energy generation on the island, and if so, what mix of generation is required, the optimum locations for such generation and the possible benefits to the community. Carbon audits have been prepared for Cumbrae, and work is now progressing towards the creation of a Community Climate Action Plan (CCAP).

In pre-empting that work, this proposal undermines the entire Carbon Neutral Islands project, and if approved, would send a stark warning to other islands that were selected, signalling that rather than being a "community led" initiative, as stated by the Scottish Government, they will actually have poorly-thought out, cynically exploitative and unwanted developments forced upon them.

Katy Clark, MSP for the West Scotland Region, has written to Mairi Gougeon MSP, Cabinet Secretary for Rural Affairs and Islands, raising concerns about the proposed solar farm and referencing the January Progress Report for Carbon Neutral Islands which states: "the project has communities at its heart. Implementation will take a bottom-up approach including active participation of island communities and organisations to ensure their voices are heard and they have a say in their own decarbonisation journeys".

Transport



Above: The poor condition of the narrow core path that leads to the site of the proposed solar farm.

The Transport & Access Statement submitted as part of the application is wholly inadequate and does not even mention the impact of the construction works on the ferries or Largs. Unlike the Millport Flood Protection Scheme works, there is no plan to mitigate the impact of the large number of HGV vehicles on the capacity of the ferries. This will have a direct impact on tourism, and the welfare of islanders, with increased queues on this lifeline service.

In addition, there is a clear conflict between the HGV's that will be required to deliver the 12,000 solar panels and other equipment and buildings associated with the proposals, and the use of the core path by pedestrians. The access route for the HGV construction vehicles is the Inner Circle Road, a core path which is entirely unsuitable for such a volume of HGV's by virtue of its width, geometry, and surface.

The Transport & Access Statement refers to a requirement for "potential" improvements and passing places along with modifications would be required to the junction of the B899 / U36 to enable the movement of HGVs. These would have a detrimental impact on the special character of the core path. It also identifies the car park at highest point on the core path as a passing place, which it is not.

Landscape and Visual Impact Assessment



Above: The proximity of the proposed site to the core path

In terms of the Landscape and Visual Impact Assessment that has been carried out, this in no way reflects what will actually be seen. All but one of the views shown are from a significant distance, diminishing the scale of the 38 acre solar farm in a way that is totally unrepresentative, and we consider misleading. There is no view, for example, from the core path leading from the highest point to Barbay Hill, which runs directly alongside the solar farm, and is where the entrance to the site will be and where the majority of the buildings associated with the development will be located.

No mitigation or enhancement measures have been proposed by the applicant.

It should be noted that because much of Millport is within a conservation area, there are no permitted development rights allowing local residents to install solar panels on their own roofs because they might negatively affect public views from within or towards the Conservation Area.



Above: View of the proposed site from the core path at the highest point



Above: View of the proposed site from Ferry Road



Lack of community engagement or community benefit

Above: The planning notice for the proposed development

There has been an almost total lack of engagement with the local community by the applicant and a total lack of dialogue.

Notices telling the community about a one-day exhibition did not arrive until after the exhibition had finished and so only a 35 of people attended. None of the comments that were made at the exhibition were taken on board by the applicant, nor have they taken on board any of the hundreds of comments submitted to North Ayrshire Council in relation to the previous two planning applications.

The Planning Statement submitted by the applicant states: "A planning application was subsequently submitted in May 2022 (portal ref: 22/00385/PP). This application was withdrawn by the Applicant, who advised that they intend to submit a revised application once the comments raised in this application had been addressed."

The only change that has been made since that application is an increase in the size of the solar farm from 5MW to 19MW.

A protest objecting to the solar farm attracted more than 100 participants, who made their way to the highest point of the island to express their feelings about the potential loss of this much-loved site.



Above: A protest by more than 100 people against the solar farm held at the highest point in February 2023

It is notable that the applicant has not proposed any community benefit whatsoever. They have not identified any specific local job creation or other local benefits, and the power generated will all be fed back to the national grid.

NPF4 Policy 11c state: "Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities."

Appendix 1 Observations of birds on the application site

E. Williams

The following list consists of birds observed on and around the proposed site. It is not a complete assessment of the whole area. Observations are from roadside and paths surrounding the proposed site. Breeding status is evidenced mainly through observation such as: display, courtship, singing males, defending of a possible nest, sitting on nest and sightings of young. Unless otherwise stated birds have been recorded in all years form January 2017 until December 2022.

Since January 2017 a total of 136 birds have been officially recorded on and around Great Cumbrae, 56 of which have been observed on or around the proposed site. 20 of these are protected or endangered species.

Bird status from The British Trust for Ornithology (BTO) and The Royal Society for the Protection of Birds (RSPB)

Red List:

- Have declined by more than 50% in the last 25 years, or longer.
- Are globally threatened or are not recovering from historical decline.
- Have had their breeding range in the UK reduced drastically by at least 50% in the last 25 years or longer.

Amber List:

- Have moderately declined by 25 50% in the last 25 years or longer.
- Are recovering / recovered from historical decline.
- Are a rare breeder in the UK or of either European or International importance.

Endangered birds

1.	Classified in the UK as Red under the Birds of Conservation Concern 5: the Red List for Birds (2021). Protected in the UK under the Wildlife and Countryside Act, 1981.	Dunlin	Seen by the ecologist sent by the solar farm applicant. The total number of records submitted during the period 2017 - 2022 was 60 which covers the whole island. Total counts ranged from single birds to a flock of 294. Estimates, where accurate counts were not possible, range from around 20 birds to around 200. I have a further 10 records for this year with a maximum count of 124 at Clashfarland.
2.	Classified in the UK as Red under the Birds of Conservation Concern 5: the Red List for Birds (2021). Protected in the UK under the Wildlife and Countryside Act, 1981.	Greenfinch	A breeding species on the island in small numbers. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site. In recent years a decline in numbers has been linked to an outbreak of trichomonosis, a parasite-induced disease that prevents the birds from feeding properly.
3.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021).	Skylark	Up to three singing males have been observed in all years. According to RSPB it has declined by 70% in the last 50 years, mainly through use of insecticides and habitat loss.
4.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021). Priority Species under the UK Post-2010 Biodiversity Framework. Listed as Near Threatened on the global IUCN Red List of Threatened Species.	Lapwing	At least one pair has been observed displaying and defending possible nest within the proposed site in all years. Less than 10 pairs are observed displaying on the island in most years. Declining species.
5.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021). Priority Species under the UK Post-2010 Biodiversity Framework.	Curlew	Scarce breeding bird on the island. Birds have been observed displaying and defending possible nest on proposed site. Breeding confirmed in other areas of the island. Courtship observed on one occasion in an area just outside the proposed site. On 27 April 2022 a total 5 birds were observed within the proposed site.

6.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021). Protected in the UK under the Wildlife and Countryside Act, 1981.	Linnet	Breeds on the island. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site.
7.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021). Protected in the UK under the Wildlife and Countryside Act, 1981.	Lesser Redpoll	Breeds on the island. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site.
8.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021).	Cuckoo	Almost certainly a breeding species. Birds are observed each year at the proposed site. Young are raised by other birds with main target species in the proposed site being Meadow Pipit and Dunnock.
9.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021).	Swift	Birds only observed feeding above proposed site.
10.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021).	House Martin	Birds observed feeding above proposed site. Breeding confirmed in surrounding area.
11.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021).	Whinchat	No evidence of breeding although habitat suitable. Only known sighting in recent years was by a visitor to the island in May 2019, although it would appear that this sighting was not officially submitted at the time.
12.	Classified in the UK as Red under the Birds of Conservation Concern 4: the Red List for Birds (2021).	Mistle Thrush	Birds are mainly confined to areas with woodland edge. Birds have been observed at the edge of the proposed site, mainly around Barbay Hill. Most likely a breeding bird on the island.

13.	Classified in the UK as Amber under the Birds of Conservation Concern 4: the Red List for Birds	Oystercatcher	Confirmed breeding on proposed site and young observed. Up to six pairs observed nesting from the roadside. Breeding common
14.	(2021). Classified in the UK as Amber under the Birds of Conservation Concern 4: the Red List for Birds (2021). Protected in the UK under the Wildlife and Countryside Act, 1981.	Snipe	throughout island. Birds have been observed displaying over proposed site. Suitable habitat with possible breeding.
15.	Classified in the UK as Amber under the Birds of Conservation Concern 4: the Red List for Birds (2021).	Black-headed Gull	Breeds around the island. Birds have been observed on proposed site with one possible breeding pair. Young birds observed around the island following the breeding season.
16.	Classified in the UK as Amber under the Birds of Conservation Concern 4: the Red List for Birds (2021).	Common Gull	Common breeding bird around the island with up to three pair observed, from the roadside, at proposed site. At least one possible breeding pair. In the past this area had one of the largest breeding colonies within the Clyde recording area.
17.	Classified in the UK as Amber under the Birds of Conservation Concern 4: the Red List for Birds (2021).	Meadow Pipit	Most common breeding species within the proposed and surrounding area with breeding confirmed. Also breeds in other areas of the island. Main food source of predatory birds. Target nest of Cuckoo.
18.	Classified in the UK as Amber under the Birds of Conservation Concern 5: the Red List for Birds (2021).	Sparrowhawk	Birds observed hunting on proposed site with possible breeding in surrounding area. Breeds in other areas of the island.
19.	Classified in the UK as Amber under the Birds of Conservation Concern 5: the Red List for Birds (2021).	Sedge Warbler	Summer visitor. Small numbers of birds have been confirmed as breeding on the island with young birds seen and birds carrying food to nesting site. Birds have been observed in the area surrounding the proposed site.
20.	Classified in the UK as Amber under the Birds of Conservation Concern 5: the Red List for Birds (2021).	Wheatear	Pairs have been observed throughout the island, mainly from March to May and from September to October. Single birds have been observed

	within the proposed site on at least two occasions. Possible breeding
	bird on the island.

Other birds

1.	Greylag Goose	Common and widespread. Breeds on the island. Birds observed on proposed site but breeding not confirmed. Breeding confirmed on other areas of the island.
2.	Mallard	Common and widespread with breeding confirmed on proposed site.
3.	Little Grebe	Common and widespread. Birds observed feeding on Minnemoer. Possibly breeding on reservoirs.
4.	Grey Heron	Common and widespread. Birds observed feeding on Minnemoer
5.	Buzzard	Birds observed hunting on proposed site with breeding in surrounding area. Young birds have been observed within the proposed site.
6.	Common Sandpiper	Summer visitor, common around island. Breeding confirmed. Birds have been observed feeding on Minnemoer.
7.	Herring Gull	Birds observed in the area. Predatory species.
8.	Great black-backed Gull	Birds observed in the area. Predatory species.
9.	Woodpigeon	Common and widespread. Breeds in surrounding area to proposed site as well as other areas of the island.
10.	Sand Martin	Birds observed feeding over proposed site. Uncommon breeding bird on the island with only two nesting sites, both outwith the proposed site.
11.	Swallow	Birds observed feeding over proposed site. Common breeding species on buildings around the island.
12.	Grey Wagtail	Birds have been observed feeding in the area.
13.	Pied Wagtail	Birds have been observed feeding in the area.

14.	Wren	Common breeding bird. Breeding in surrounding area.
15.	Dunnock	Common breeding bird. Target species for Cuckoo.
16.	Robin	Common breeding bird. Breeding in surrounding area.
17.	Stonechat	Widespread and common. Susceptible to declines in severe winters. Birds have been observed around the proposed site but breeding not confirmed. Breeding confirmed in other areas of the island.
18.	Blackbird	Common breeding bird throughout the island.
19.	Song Thrush	Common breeding bird throughout the island.
20.	Whitethroat	Common and widespread with confirmed breeding on the island. Birds have been observed around the proposed site, favouring areas of gorse and dense vegetation. There have been three records in recent years of Lesser Whitethroat on the island. A young bird was seen at the Field Studies Centre (FSC) in 2019 and a bird heard singing in the Farland area in 2022, both of these were by staff from FSC. The third record of a singing male, by a visitor to the island, in 2019. This is a rarer species in Scotland and is at the northern limit of its range. A proper assessment of suitable habitat for this species has never been conducted on the island. This species may be a new arrival to the island.
21.	Garden Warbler	Summer visitor. Common and widespread. Singing males have been observed in the surrounding area.
22.	Blackcap	Summer visitor. Common and widespread. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site.
23.	Chiffchaff	Summer visitor. Common and widespread. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site.
24.	Willow Warbler	Summer visitor. Common and widespread. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site.
25.	Goldcrest	Common and widespread. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site.

26.	Long-tailed Tit	Common and widespread. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site.
27.	BlueTit, Coal Tit and Great Tit	Common and widespread. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site.
28.	Magpie	Uncommon on island. Common and widespread throughout UK. Occasional birds are seen on proposed site and surrounding area.
29.	Jackdaw	Common and widespread throughout island.
30.	Rook	Common and widespread throughout island.
31.	Carrion Crow	Common and widespread throughout island.
32.	Raven	At least three pairs are known to nest on the island. Predatory species. Birds have been observed on the proposed site and surrounding area.
33.	Starling	Common and widespread around the island.
34.	Chaffinch	Common and widespread around the island.
35.	Goldfinch	Common and widespread around the island.
36.	Siskin	Common and widespread. Birds have been observed in the surrounding area and on trees and bushes fringing the proposed site.