Scottish & Southern Electricity Networks
TRANSMISSION

TECHNICAL APPENDIX 4.2 SCOPING OPINION

COMHAIRLE NAN EILEAN SIAR
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Isle of Lewis
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Email: planning@cne-siar.gov.uk
Date: 26 November 2024
Your Reference: LT14
Our Reference: 24/00325/SCOPING

Issued by email only to murray.agnew@sse.com

Scottish and Southern Electricity Networks Transmission
Per Murray Agnew
Inveralmond House,
200 Dunkeld Road,
Perth
PH1 3AQ

Dear Sirs,

ENVIRONMENTAL IMPACT ASSESSMENT - SCOPING OPINION RESPONSE
LEWIS SUBSTATION AND CONVERTER HUB - ISLE OF LEWIS.

1.0 INTRODUCTION / OVERVIEW

This scoping opinion is issued by Comhairle nan Eilean Siar to Scottish Hydro Electric (SHE) Transmission plc ("the Applicant") in response to a request dated 29 August 2024 for a scoping opinion under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulation 2017 in relation to the Lewis Hub 400kV AC Substation and DC Convertor Station at land in the vicinity of MacAulay Far, Arnish Moor, Isle of Lewis.

The scoping opinion request was accompanied by a scoping report (the Report) prepared by Ramboll Uk . on behalf of Scottish Hydro Electric (SHE) Transmission plc, operating and known as Scottish and Southern Electricity Networks Transmission ("SSEN Transmission").

This Response refers to the Chapter (and Paragraph Numbers) adopted in the Report.

Reference should be made to Appendix 1 for the detailed responses of individual consultation bodies.

2.0 THE PROPOSED DEVELOPMENT

The Planning Site boundary and the Operational footprint boundary of the Proposed Development are illustrated in Figure 2.1 appended to the Report. The components of the Proposed Development are set out in Section 2.2 of the Report and in summary comprise:

The High Voltage Direct Current (HVDC) Converter Station to enable a proposed 2 GW HVDC link from Arnish Point, Isle of Lewis to Loch Broom on the Scottish mainland. It would have an overall platform footprint of around 320m by 310m (9.92 ha) and a maximum height of 27.5 m and would 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 buildings;
- two AC Hall and Filter Equipment buildings ; and
- a number of smaller auxiliary buildings (diesel generator, spares building, etc).

132 kV and 400 kV Substation will have an overall platform footprint of around 260m by 250m (6.5ha) and be enclosed in buildings to a maximum height of 27.5m and would consist of the following:

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

Ancillary Works which would be required to facilitate construction and operation of the Proposed Development and would include:

- vegetation clearance;
- upgrade existing or establishment of new junction bellmouths;
- the diversion and/or culverting of an unnamed watercourse (a tributary of the River Creed);
- extraction of rock from borrow pits or quarries;
- establishment of temporary and permanent access for the construction and maintenance of the Proposed Development; and establishment and reinstatement of temporary site compounds

Road Improvements and Access during Construction

Some road improvements will also be required for the construction of the Proposed Development and some utility diversions may also be required. Existing tracks would be used where possible.

Construction Compounds

Temporary construction compound locations would be required during construction, located within the site boundary. These would provide office and welfare facilities for site staff, parking, laydown areas and holding and servicing space for construction plant

Landscape Proposals

Landscape mitigation measures would provide partial visual screening and help assimilate the Proposed Development into the surrounding landscape and also seek to provide habitat biodiversity and opportunities for biodiversity enhancement.

Peat Reuse Proposals

Some of the excavated peat on-site would be re-used within the Site boundary, while the remainder would be transported off- site. Quantities for onsite use V transport off-site will not be known till detailed design stage once peat volumes are confirmed

Transmission and Distribution Line connections

Connections via overhead lines and via underground cables 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.

Construction Programme and Hours of Working.

Working hours are anticipated between approximately 07.00 to 19.00 Monday to Friday and 07.00 to 17.00 on Saturdays.

Phasing

- Stage 1 – Enabling Works and Civils Construction
- Stage 2 – Construction of Convertor Station and Substation
- Stage 3 – Commissioning
- Stage 4 – Post Construction Reinstatement

3.0 EIA METHODOLOGY

Cumulative Assessment

If not included in the Baseline, the Stornoway Deep Water project (24/00185/HROSCO) should be added to the list for inclusion within the EIAR for cumulative impact assessment.

No other comments

4.0 LANDSCAPE AND VISUAL AMENITY

General points

ZTV Resolution

The resolution of the ZTV submitted with the Scoping Report is very poor. The Comhairle can accept high resolution files via Sharepoint and request that a High Resolution version is submitted as part of the EIA Report. When selecting colours for overlay, please avoid using colours that are common on map bases. For example, ensure that greens and blues cannot be confused with woodland and water. Please ensure that a colour key is clear and include all relevant analysis details. Please include a method statement that clearly describes how the analysis was done and how it is presented. The use of green on the grayscale map base presented on ZTVs Figs 4.2; 4.2 and 4.3 is not easily read.

The Comhairle Archaeology Service raise concerns that the scale of impact on Landscape and Visual Amenity is not currently sufficiently clear to form a clear view and provide conclusive advice.

Labelling

All A and B Roads identified by number should also include a descriptive reference e.g. Vehicle travellers heading south on the A857; Barvas Moor Rd; People traveling in both directions on the A859; to from Lochs/Harris; Road users heading west on the A866; from Point etc.

Colour Option

Given the scale and height of the proposed buildings, we welcome the opportunity to contribute to possible colours of external fabric; materials and colours should be neutral or make a positive contribution to the character of the surrounding area

Environmental information held

None

Scoped Out

The Scoping Report sets out the methodology and scope of the Landscape and Visual Impact Assessment (LVIA). We agree with the methodology to be adopted for the LVIA and with the Study Area being defined as 25km from the hub location. We would expect the EIAR to have a particular focus on an area within 5km of the building where significant adverse landscape and visual impacts are most likely to occur.

Yes - we agree that Linear Crofting LCT; and dispersed crofting LCT are scoped out.

Yes - we agree that effects on the NSA and effects on Wild Land (WLA30 and WLA33) should be scoped out of the EIAR assessment.

The Comhairle is content with the scoping out of theoretical visibility as described in paragraphs 4.6.5 to 4.6.11. The Justification proposed is accepted for scoping out the

following from Route Assessment

- North bound vehicle travellers on the A857;
- The A858;
- East bound road users on the A886;
- North bound vehicle travellers on the B895;
- Road users travelling south on the B897;
- Hebridean Way Cycle Route

Key issues or possible effects - Viewpoint Selection

Additional Viewpoints to be screened as potentially suitable for generation of wireframes/Visualisations (as agreed with horner + maclennan landscape architects)

- Sandwick cemetery entrance - NB 143993 932581
- Lower Sandwick - NB43930 3174 or slightly different location to be selected in the field
- Creed Bridge car park - NB 40436 32534
- A point NW corner of the golf course - NB 41342 33906

North Lochs Community Council highlight that

- The current viewpoints on the A859 do not fully capture a panoramic approach of the site approaching from the South. We would like to see an additional viewpoint, just south of the current viewpoint number 6. We would suggest this is positioned this just north of the Creed Park Recycling Centre turnoff.
- They further suggest consideration of a viewpoint further south on the A859 on the brow of the hill at the Halfway Garage.

Note: OHLDP Policy DS1 Development Strategy states that: “Siting and Design should be approach to the characteristics of main settlements and should contribute positively to the key approaches to the settlement”.

Key issues or possible effects - RVAA

Depending on the project design and final location of the substations, the assessment will require views of the development from within and on approaches to settlements, (visual amenity from settlements 2km). CnES welcomes consultation on the RVAA as the project design is refined.

5.0 CULTURAL HERITAGE

General Points

The ZTV drawing requires to be improved. A better contrasting colour scheme should be applied to a 'contoured' base map and it should be in an accessible detailed format.

Environmental information held

North Lochs Community Council advise that the following groups are likely to hold relevant environmental data

- North Lochs Historical Society
- North Lochs Heritage Projects

Western Isles Historic Environment Record: https://her.cne-siar.gov.uk/

Historic Environment Scotland has advised the following in relation to the following four Scheduled assets within the Study Area; Note: Of the four scheduled monuments HES advise that Cnoc na Croich chambered cairn (SM6550) is likely to have the greatest potential for adverse impacts on its setting

- Cnoc na Croich chambered cairn (SM6550) is located atop a wooded hillock in the grounds of Lews Castle near Stornoway. It comprises the remains of a prehistoric chambered cairn, with a covering of scrub, surmounted by a later cairn and flagpole. The hilltop is the supposed location of medieval gallows.

  The cairn has been incorporated into the designed landscape surrounding Lews Castle, which has restricted the relationship between the cairn and its surroundings, other than with Stornoway harbour. Prior to this the cairn would have been visible from throughout the surrounding area and be provided with wide views in all directions, including towards the development site.

  Given the topography it is likely that the proposed development would be clearly visible in outward views from the monument. There is also the potential for the development to be visible in the background of key inward views of the cairn from the east. These impacts should be assessed through the use of a detailed ZTV and photomontages as required. We welcome that this asset will be Scoped into the EIA assessment, however at this stage it is not possible to assess the severity of these impacts on the setting of the monument.

- Arnish Point, gun emplacements (SM5347) comprise the remains of a WW2 emergency coastal battery surrounded by the remains of a hutted encampment, access roads and a service conduit.

Its setting is focused on key views associated with the approaches along the sea and the mouth of Stornoway Harbour.

The proposed development would be inland of the key views associated with the setting of this monument. There is the possibility that infrastructure may be present in the background of inward views of the gun emplacements from the sea. We welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment.

- Loch Arnish, dun (SM5397) comprises an Iron Age dun located on an islet within a loch. It is located to the south-east of the development site, with the access road to Arnish running along the northern end of the loch.

  Whilst the setting of duns and brochs and forts often includes a visual relationship to other broadly contemporary Iron Age sites in the landscape, in the Western Isles duns and brochs were often located on islets in lochs, with the water used either or both as a form of defence and to create a rather more defined setting.

  Although it is unlikely that the proposed development would be visible from the dun, it may be visible in the background of some views of the dun from the southern or eastern shores of the loch thus potentially intrude into dun's relationship with the loch. We welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment.

- Druim Dubh stone circle (SM5504) is located to the south-west of the development site and comprises an elliptical ring of fallen standing stones. The circle contains sixteen evenly spaced stones. Nine of the stones are buried beneath peat while the seven visible stones have been revealed by peat-cutting. There are remains of sockets with packing stones beside most of the stones.

  Positioned on a low but prominent flat-topped hillock, it overlooks reasonably flat moorland on all sides and when all stones were standing it would have been widely visible. Whilst there is small-scale modern development to its east and an overhead line to its north-west, these structures so not overly affect those wider views or overwhelm the monument.

CnES Archaeology Service advise that Druim Dubh Stone Circle must be used as a Viewpoint for visualisation (Heritage) and additionally, on account of the poor quality of the ZTV proposed viewpoints will require further consultation.

Sensitive Receptors (Para 5.3)

The Archaeology Service of Comhairle nan Eilean Siar has highlighted that the conclusion that the proposed development will not have a significant effect on the setting of the GD (para 5.3.1) seems premature at this stage.

Comhairle nan Eilean Siar therefore does not accept, without further detailed assessment the statement in 5.3.1 i.e. that the proposed development is considered unlikely to have a significant effect on the setting of the surrounding designated heritage assets, the closest of which is the Lews Castle and Lady Lever Garden and Designed Landscape (GDL 00263)

Historic Environment Scotland noted as follows

- *We note that the preferred site is located immediately to the south of the Category A-listed Lews Castle (LB18677) and the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263). We welcome that these heritage assets will be* ***scoped into the EIA assessment****. We recommend the use of a detailed ZTV and photomontages to inform the setting assessment.*

Methodology

The Archaeology Service of Comhairle nan Eilean Siar has highlighted that further aspects within the methodology of the scoping report should be considered or modified and included within the EIA.

- The proposed development comprises of two sites, located each side of the main road. Arnish North includes part of the former Lewis Chemical Works historic site. Arnish Moor in the southern area is in an elevated position and comprises of reclaimed farmland and peat moorland. The Cultural Heritage Chapter omits to identify the potential for unknown archaeological features or deposits, although the extensive peat deposits are identified in other chapters. The location of two prehistoric scheduled monuments gives indicative potential for Neolithic or Early Bronze Age deposits with or below the peat. This is borne out by earlier coring data and c14 analysis, recovered from the Stornoway Sub Station site.
- It is noted that further consultation will take place regarding additional mitigation measures(5.5.13); the Archaeology Service is likely to recommend some form of pre-construction assessment. This is likely to include assessment of peat probe data to inform a peat coring strategy for palaeo-environmental remains, limited evaluation trenches, dependant on local environmental conditions and followed up by a program of strip, map and record watching briefs. Later period upstanding archaeological sites are likely to be dealt with through survey and excavation or by protective fencing.

<u>Scoped Out</u>

- Agreed: Battlefields; and World Heritage Sites;
- Agreed : Listed buildings within the Stornoway townscape
- Agreed - Designated heritage assets that lie outside of the zone of theoretical visibility (ZTV) for the Proposed Development ((with the exception of the Category A-listed Lews

Castle (LB18677) and the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263). And Stornoway War Memorial, where further evidence/justification should be provided or an assessment presented through the EIAR); and

- Assessment of settings impacts on designated heritage assets more than 3 km from the Proposed Development (with the exception of Stornoway War Memorial, where further evidence/justification should be provided in the EIAR)

6.0 ECOLOGY AND NATURE CONSERVATION

Environmental information held

None, not already available through public resources

Baseline data/ range of surveys

Field Surveys and Habit Surveys as proposed considered sufficient

Key issues omitted

- 6.4 – Sensitive Receptors - Pipistrelle bats, a European Protected Species (EPS) are present in and around the Lews Castle Grounds/ Garden and Designed Landscape; it is possible that there may be some suitable habitat for them in the conifer-planted areas within the red-line footprint

Biodiversity Net Gain (BNG)

BNG Assessment and 10% commitment welcomed

Scoped out

Agreed: The protected areas Lewis Peatlands SAC and Tong Saltings SSSI to be scoped out have no connectivity to the development proposal.

Consider following survey: effects on Bog habitat/ Groundwater Dependent Terrestrial Ecosystems (GWDTE),

Note: 6.6.3 – slow worm is the only native reptile species, for which suitable habitat exists on site.

7.0 ORNITHOLOGY

Environmental information held

- None, that are not already available through public resources
- North Lochs Community Council advise that Curracag- The Outer Hebrides Natural History Society may hold useful information

Proposed approach for collection of baseline data/ the range of surveys

Field Surveys and Habit Surveys as detailed considered sufficient

SCOPING OUT

AGREED - Disturbance (Operational Phase)

*NatureScot consider that **none of the following** warrant inclusion in the EIA –*
Red-listed species:

- Scaup
- Lapwing;

Amber-list species:

- *pink-footed goose*
- whooper swan
- oystercatcher
- wood sandpiper
- red-breasted merganser;

Schedule 1 species:

- great northern diver.

NatureScot advise that an HRA is not required in relation to likely significant effects on the North Harris mountains SPA, or the West Coast of the Outer Hebrides SPA. In their view, there is not sufficient of an impact pathway between the development proposal and these sites to justify their inclusion

Most Important Issues

NatureScot consider that

- impacts upon the Schedule 1 species **hen harrier and merlin** are likely to be the most important at this particular site. The habitat appears especially suitable for these species. The development site is close to what has been the centre of the expanding hen harrier population in Lewis in recent years. Please review Habitat Loss (Construction and Operational Phase) in relation to this species
- Proposals for offsetting and enhancement will also be a key issue at this site.

8.0 HYDROLOGY, HYDROGEOLOGY, GEOLOGY, AND SOILS

Environmental Information HELD

None, not already available from public sources

Baseline data and range of surveys

Please refer to SEPA (Site Specific comments) and SEPA (Standing Advice) contained within Appendix 1 which set out the requirements and standards for surveys required by SEPA.

Scoped Out

- PWS – Query - SEPA seek further information/assurance on scoping out of Private Water Supplies given there is a PWS 250m NE of the site
- Flood Risk Assessment Agreed but note: SEPA seek further details of the watercourse re-routing be provided in draft form, prior to final submission, as very little information has been provided at this stage on what is to become of these drains/watercourses.
- Groundwater dependent terrestrial Ecosystems – Further information to support justification required
- Watercourse Crossings. – review in light of SEPA standing guidance

Most important

Class 1 peatland soils - Peat and peatland survey information supported by a robust Peat Management Plan (Refer to SEPA guidance). Peat surpluses and re-use options; Peat Landslide Risk

Drainage Strategy - Surface Water Management; avoiding transport of sediment to watercourses; requirement to maintain the water quality standards of the Creed River and Stornoway Harbour

9.0 TRAFFIC AND TRANSPORT

General

Labelling - All A and B Roads identified by number should also include a descriptive reference e.g. A857- Barvas Moor Road.

Environmental information held

Consult Comhairle Roads for any Traffic count data held. (Varies)

Baseline data and range of surveys

The report should include a detailed assessment of construction traffic showing the type of vehicles and forecasted trips during construction

Scoped out

- Operational Traffic – Agreed – likely to be light good vehicles
- Decommissioning Traffic – Agreed – likely to be less impact than construction phase traffic
- Construction Traffic **– <u>Not agreed</u> (see below)**

<u>Construction Traffic</u>

Comhairle Roads raise concerns that The construction phase of the development on traffic and transport has been scoped out; Acknowledged impacts as temporary but given local context, they believe effects are likely to be significant. (increased traffic flows, changes to the traffic composition – increase in HGV movements carrying construction materials to site such as concrete, aggregates, plant and general construction materials as well as the transmission equipment

North Lochs Community Council consider that 'construction' phase impacts should be scoped back into the EIA for the Traffic and Transport section. They advise that this section of the A859 is currently dangerous for cyclists with frequent overtaking on the double lined section with an adjacent blind summit and concealed entrance at Macaulay Farm. The increase in heavy and slow-moving plant vehicles crossing blindly into the site entrance on the A859 and on/off the Arnish Road will have a major impact on cyclist and road user safety.

Transport Scotland would advise that the Construction Traffic Management Plan (CTMP) should consider all traffic and transport impacts including those on the mainland Trunk Roads should there be any e.g. are large indivisible loads to be shipped by road (rather than Port to Port)

Comhairle nan Eilean Siar advise that Construction Traffic requires to be thoroughly assessed and scoped into the EIA Report

10. NOISE and VIBRATION

Baseline conditions and methodology

- Comhairle EH agree with approach to noise assessment.
- North Lochs Community Council request that Consideration should be given to additional noise sensitive receptors at Lochside Area (equestrian facility) and Creed Recycling Centre (place of work).

Scoped Out

- Comhairle EH agree with vibration being scoped out. (Vibration from blasting can be controlled via planning conditions, as detailed in the Scoping report).

11.0 OTHER ISSUES

Scoped In/Scoped Out

- Population and Human Health – Review the Scoping out of this issue – impacts and effects in isolation and in cumulation with the other identified developments – additional workforce numbers likely to be imported; how they will be housed; facilities provided; capacity of existing health care services e.g. Dentist, GP and Hospital Services. The developer should consult with the Director of Public Health in the Outer Hebrides, NHS Western Isles. A housing strategy should also be prepared.

- Climate Change – Review and consider if there are significant positive benefits to climate change arising from the Proposed Development

- Socio-Economics, Recreation And Tourism - Comhairle nan Eilean Siar agree that while this may be scoped out of the EIA a standalone assessment of socio-economic impacts in the context of evidence of compliance with national and local development policy is required. Consideration should be given to likely impacts upon Tourism and Recreation' with particular regard to impacts and mitigation measure for potential negative effects on : Equestrian, Hebridean Way Walk Route; Cycling; amenity of Lews Castle Grounds and Karting in the near vicinity of the development

- Land Use - Whole Topic Scoped Out – Agreed - not high quality agricultural quality land – Information may be held by North Lochs Grazings Committee

- Electric and Magnetic Fields (EMF) - – Scoped Out - Agreed

- Major Accidents and Disasters - – Scoped Out – Agreed subject to assessment of peat and Peat Landslide risk as referred to above.

- Air Quality - – Scoped Out – Agreed

I trust the foregoing is of assistance to you in formulating a response to the Scoping Report.

Yours faithfully

Morag Ferguson
Planning Manager (Development Management)
Chief Executive's Department

Encl: Appendix 1 – Consultation Responses

HISTORIC ENVIRONMENT STAKEHOLDERS

HISTORIC ENVIRONMENT SCOTLAND

We understand that the proposed development comprises a new High Voltage Direct Current (HVDC) converter station in the vicinity of Arnish Point, Isle of Lewis. The works comprise the formation of a 60ha compound containing various infrastructure components up to a maximum height of 27.5m, an underground cable beneath the Arnish road leading to the landfall of the submarine HVDC cable and an overhead line on wood poles linking the HVDC station to the wider network.

Scope of assessment

We recommend that the applicant refers to the EIA Handbook for best practice advice on assessing cultural heritage impacts.

We have identified likely significant effects on our historic environment interests. There are several designated heritage assets within the vicinity of the development site and the proposals may impact their setting.

Our advice on the nature of these impacts, and any potential mitigation measures, are included in an annex to this covering letter. This also includes our requirements for information to be included in the EIA Report.

Further information

Decisions that affect the historic environment should take the Historic Environment Policy for Scotland (HEPS) into account as a material consideration. HEPS is supported by our Managing Change guidance series. In this case we recommend that you consider the advice in the Managing Change in the Historic Environment: Setting guidance note.

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ANNEX

Background

We have previously provided pre-application advice for similar proposals for a smaller facility at Arnish Point and for a HD/VC converter station further to the north and north-west of the current preferred site. Given the proposed location we requested clarification regarding potential impacts in relation to quarry works within the Lady Lever Park GDL

In November 2023 we met with the applicant for an introductory meeting and initial overview of revised preferred location, which was at the time Site 6: Creed North. A further update on the proposals was provided by the applicant in February 2024 regarding a change to the preferred site further to the south-east at MacAulay's Farm.

Scheduled Monuments

There are four scheduled monuments within 3km of the proposed development site that have the potential to be subject to adverse impacts on their settings. Of these, **Cnoc na Croich chambered cairn (SM6550)** is likely to have the greatest potential for adverse impacts on its setting.

Cnoc na Croich chambered cairn (SM6550) is located atop a wooded hillock in the grounds of Lews Castle near Stornoway. It comprises the remains of a prehistoric chambered cairn, with a covering of scrub, surmounted by a later cairn and flagpole. The hilltop is the supposed location of medieval gallows.

The cairn has been incorporated into the designed landscape surrounding Lews Castle, which has restricted the relationship between the cairn and its surroundings, other than with Stornoway harbour. Prior to this the cairn would have been visible from throughout the surrounding area and be provided with wide views in all directions, including towards the development site.

Given the topography it is likely that the proposed development would be clearly visible in outward views from the monument. There is also the potential for the development to be visible in the background of key inward views of the cairn from the east. These impacts should be assessed through the use of a detailed ZTV and photomontages as required. We welcome that this asset will be Scoped into the EIA assessment, however at this stage it is not possible to assess the severity of these impacts on the setting of the monument.

Arnish Point, gun emplacements (SM5347) comprise the remains of a WW2 emergency coastal battery surrounded by the remains of a hutted encampment, access roads and a service conduit. Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH Scottish Charity No. **SC045925** VAT No. **GB 221 8680 15**

Its setting is focused on key views associated with the approaches along the sea and the mouth of Stornoway Harbour.

The proposed development would be inland of the key views associated with the setting of this monument. There is the possibility that infrastructure may be present in the background of inward views of the gun emplacements from the sea. We welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment.

Loch Arnish, dun (SM5397) comprises an Iron Age dun located on an islet within a loch. It is located to the south-east of the development site, with the access road to Arnish running along the northern end of the loch.

Whilst the setting of duns and brochs and forts often includes a visual relationship to other broadly contemporary Iron Age sites in the landscape, in the Western Isles duns and brochs were often located on islets in lochs, with the water used either or both as a form of defence and to create a rather more defined setting.

Although it is unlikely that the proposed development would be visible from the dun, it may be visible in the background of some views of the dun from the southern or eastern shores of the loch thus potentially intrude into dun's relationship with the loch. We welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment.

Druim Dubh stone circle (SM5504) is located to the south-west of the development site and comprises an elliptical ring of fallen standing stones. The circle contains sixteen evenly spaced stones. Nine of the stones are buried beneath peat while the seven visible stones have been revealed by peat-cutting. There are remains of sockets with packing stones beside most of the stones.

Positioned on a low but prominent flat-topped hillock, it overlooks reasonably flat moorland on all sides and when all stones were standing it would have been widely visible. Whilst there is small-scale modern development to its east and an overhead line to its north-west, these structures so not overly affect those wider views or overwhelm the monument.

It is possible that elements of the proposed development may be visible in outward views from the monument looking north-east, although a more detailed ZTV will be required to confirm this. Therefore, we welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment.

Listed Buildings and Garden and Designed Landscapes (GDLs)

We note that the preferred site is located immediately to the south of the **Category A-listed Lews Castle (LB18677)** and the **Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263).** We welcome that these heritage assets will be scoped into the EIA assessment. We recommend the use of a detailed ZTV and photomontages to inform the setting assessment.

Our Advice

At this stage there is not yet sufficient clarity regarding the potential visual impacts of the development on designated heritage assets. In some instances, there may be scope to mitigate potential impacts through the use of bunding and/or planting. We would expect these issues to be explored further as the scheme is developed. We also advise that the Stornoway Deep Water project (24/00185/HROSCO) be added to the list for inclusion within the EIAR for cumulative impact assessment.

We recommend further consultation with us in advance of the submission of the planning application, and we would welcome the opportunity to provide further comments on draft viewpoint locations, visualisations, and mitigation options should these be required.

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, hmconsultations@hes.scot. If you have questions about this response, please contact Sam Fox at samuel.fox@hes.scot.

COMHAIRLE NAN EILEAN SIAR ARCHAEOLOGY SERVICE

Thank you for consulting the Archaeology Service. The subject of Cultural Heritage is considered in Chapter 5, of the Scoping Report. The report identifies the range of known cultural heritage assets (both designated and undesignated) and these are separated into an inner (site boundary & 200 m buffer) or outer (3 km buffer zone) study areas. The baseline information was compiled using CnES Historic Environment Record and designation data from Historic Environment Scotland.

Potential significant impacts from the proposal are identified in Section 5.4 (5.4.1) as Direct, Indirect, Setting, and Cumulative. Further assessment is proposed in order to refine the impact potential and inform mitigation strategies.

The Archaeology Service would highlight that further aspects within the methodology of the scoping report should be considered or modified and included within the EIA.

- 5.3.1 – The conclusion that the proposed development will not have a significant effect on the setting of the GDL;, seems premature at this stage.

- The proposed development comprises of two sites, located each side of the main road. Arnish North includes part of the former Lewis Chemical Works historic site. Arnish Moor in the southern area is in an elevated position and comprises of reclaimed farmland and peat moorland. The Cultural Heritage Chapter omits to identify the potential for unknown archaeological features or deposits, although the extensive peat deposits are identified in other chapters. The location of two prehistoric scheduled monuments gives indicative potential for Neolithic or Early Bronze Age deposits with or below the peat. This is borne out by earlier coring data and c14 analysis, recovered from the Stornoway Sub Station site.
- It is noted that further consultation will take place regarding additional mitigation measures(5.5.13); the Archaeology Service is likely to recommend some form of pre-construction assessment. This is likely to include assessment of peat probe data to inform a peat coring strategy for palaeo-environmental remains, limited evaluation trenches, dependant on local environmental conditions and followed up by a program of strip, map and record watching briefs. Later period upstanding archaeological sites are likely to be dealt with through survey and excavation or by protective fencing.
- The Archaeology Service has concerns that the scale of impact on the Landscape and Visual Amenity is not currently clear enough to form a view. The ZTV drawing could be improved if a better contrasting colour scheme was applied to a ‘contoured’ base map and it was in an accessible detailed format.. Additionally, proposed viewpoints will require further consultation and must include Druim Dubh Stone Circle.

ROADS AND TRANSPORT STAKEHOLDERS

TRANSPORT SCOTLAND

The supporting information associated with the proposed development does not appear to include any reference to the utilisation of the trunk road network. Ultimately, the Scoping Report concludes that traffic and transport effects are being scoped out of the EIA.

Nevertheless, the Scoping Report does state that “Impacts on the local traffic network and transport resource will be assessed as part of an outline CTMP which will be submitted with the application. Where appropriate, the outline CTMP will identify mitigation measures to prevent, minimise and offset any likely significant effects identified. Cumulative effects from the Proposed Development in combination with other proposed developments will also be considered.”

Transport Scotland would advise that the Construction Traffic Management Plan (CTMP) should consider all traffic and transport impacts including those on the mainland should there be any, e.g., on the A835 in Ullapool, if construction related vehicles are to utilise the trunk road network. Therefore, Transport Scotland would recommend that should any utilisation of the trunk road be required to facilitate delivery of construction material, associated traffic management details should be provided for approval by Transport Scotland.

COMHAIRLE NAN EILEAN SIAR - ASSETS (ROADS AND BRIDGES)

Chapter 9 of the Scoping Report relate to the effect of Transport and Traffic to be considered and the proposed mitigation during the construction phase.

The construction phase of the development may be temporary but it is significant and there are concerns that this has been scoped out.

The report should include a detailed assessment of construction traffic showing the type of vehicles and forecasted trips during construction with a Construction Traffic Management Plan.

Although the operational phase will have less impact on the road network the report should give an indication of the vehicles to be used and frequency.

Any bridges or structures crossed as part of the Abnormal Load Route should be assessed beforehand. Mitigation works may be required along this route to allow for the delivery of units.

A large proportion of the road network is founded on peat deposits and as such the whole road network could be classed as potentially sensitive. The developer should carry out pre works condition surveys, and will be responsible for the repair of damages to the road network as a result of the project.

Peak traffic periods from other consented major wind turbine developments and this project should not coincide.

NATURAL HERITAGE

NATURESCOT

We are broadly content that the scoping report accurately and fairly reflects the matters to be included in the EIA for this proposal.

• What environmental information do you hold or are aware of that will assist in the EIA described here for the Proposed Development?

We hold Site Condition Monitoring information for Lewis Peatlands SPA, but probably too old to be of use to the present assessment.

• Do you agree with the proposed approach for collection of baseline data, and that the range of surveys across particular topics is sufficient and appropriate to inform the assessment of environmental effects?

Yes

• What other relevant existing baseline data do you expect to be taken into account?

None

• Are there any key issues or possible effects which have been omitted?

6.2.9 states - "There are no other terrestrial protected faunal species present on Lewis." However, pipistrelle bats, another European Protected Species (EPS) are also present, and it is possible that there may be some suitable habitat for them in the conifer-planted areas within the red-line footprint.

6.6.3 – slow worm is the only native reptile species, for which suitable habitat exists on site.

• Do you agree with the list of issues to be scoped out, and the rationale behind the decision?

Yes. Those protected areas to be scoped out have no connectivity to the development proposal.

• Of those issues identified for assessment, which do you consider the most important/material and which the least?

We consider that impacts upon the Schedule 1 species hen harrier and merlin are likely to be the most important at this particular site. The habitat appears especially suitable for these species. The development site is close to what has been the centre of the expanding hen harrier population in Lewis in recent years.

Proposals for offsetting and enhancement will also be a key issue at this site.

7.4.1 – We do not consider that all the species listed at 7.4.1 require to be scoped in. Specifically, we consider that none of the following warrant inclusion in the EIA –

Red-listed species:

- *Scaup*
- *Lapwing;*

Amber-list species:

- *pink-footed goose*
- *whooper swan*
- *oystercatcher*
- *wood sandpiper*
- *red-breasted merganser;*

Schedule 1 species:

- *great northern diver.*

7.6.4 We do not consider that an HRA is required in relation to likely significant effects on the North Harris mountains SPA, or the West Coast of the Outer Hebrides SPA. In our view, there is not sufficient of an impact pathway between the development proposal and these sites to justify their inclusion.

ENVIRONMENT

SCOTTISH ENVIRONMENT PROTECTION AGENCY (SEPA)

Thank you for consulting SEPA for an Environmental Impact Assessment (EIA) scoping opinion in relation to the above development. We welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter and would especially welcome further pre-application engagement once initial peat probing, peat condition assessment and habitat survey work has been completed and the layout developed further as a result.

Advice for the planning authority / determining authority

To **avoid delay and potential objection** the EIA submission must contain a series of scale drawings of sensitivities, for example peat depth, peat condition, Groundwater Dependent Terrestrial Ecosystems (GWDTE), proximity to watercourses, overlain with proposed development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, then reduce and then mitigate significant impacts on the environment. We request that the issues covered in Appendix 1 below, be addressed to our satisfaction in the EIA process. This provides details on our information requirements and the form in which they must be submitted.

We have also provided site specific comments in the following section which provides pre-application advice and can help the developer focus the scope of the assessment.

Site specific comments

In this case, where much of the site is on peat, we expect the application to be supported by a comprehensive site-specific peat management plan. We would highlight that we are streamlining our approach to consultations concerning peat and carbon rich soils and are now focusing our planning advice on the avoidance, minimisation, and use of peat in areas disturbed by construction activities. We will no longer provide advice on peatland restoration; developers should instead refer to NatureScot guidance.

As stated in Section 8 of the Scoping Report, several agricultural drains are present within the proposed footprint of development. Section 8.5.1 states that “a surface water drainage strategy (including proposals for re-routing of the watercourse in the north of the site) shall be prepared in consultation with SEPA and submitted as an appendix to the EIAR”. We would suggest that further details of the watercourse re-routing be provided in draft form, prior to final submission, as very little information has been provided at this stage on what is to become of these drains/watercourses. These will also require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (As Amended) (CAR). It is also unclear the current state of these drains/watercourses, as it is suggested that further downstream that these present as more naturalised channels,

which we would not want to see adversely impacted.

We note that Section 8.5.2 of the Scoping Report has scoped out Private Water Supplies from further assessment; however, Section 8.2.8 states that there is a Private Water Supply present approximately 250 m northeast of the site. Existing groundwater abstractions should be demonstrated to be outwith 250m of all excavations deeper than 1m. If this buffer cannot be achieved or is marginal, then further assessment should clearly demonstrate that there will be no hydrological connection, and that excavations will not impact on this supply, as is suggested.

Regulatory advice for the applicant

Details of regulatory requirements and good practice advice, for example in relation to engineering works in the water environment and waste management, can be found on the regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team at: ahsh@sepa.org.uk

If you have queries relating to this letter, please contact us at planning.north@sepa.org.uk including our reference number (PCS-20002874) in the email subject.

SEPA Appendix : Detailed scoping requirements

Please note that some of the planning guidance referenced in this response is being reviewed and updated to reflect the National Planning Framework 4 (NPF4) policies. For example the Flood Risk Standing Advice and Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems. It still provides useful and relevant information, but some parts may be updated further in the future.

This appendix sets out our minimum information requirements and we would welcome discussion around these prior to formal submission to avoid delays. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site. If there is a significant length of time between scoping and application submission, the developer should check whether our advice has changed.

Site layout

Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. All drawings must be based on an adequate scale with which to assess the information.

The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible.

A comparison of the environmental effects of alternative locations of infrastructure elements may be required.

Water environment

The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors.

The submission must include a set of drawings showing:

All proposed temporary or permanent infrastructure overlain with all lochs and watercourses;

A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works;

A map showing the location, size, depths and dimensions of all borrow pits overlain with all lochs and watercourses within 250m and showing a site-specific buffer around each loch or watercourse proportionate to the depth of excavations. The information provided needs to demonstrate that a site specific proportionate buffer can be achieved.

Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide.

Flood risk

Advice on flood risk is available at Flood Risk Standing Advice and reference should also be made to Controlled Activities Regulations (CAR) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities.

Crossings must be designed to accommodate the 0.5% annual exceedance probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures.

If it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. Our Technical Flood Risk Guidance for Stakeholders outlines the information we require to be submitted in an FRA.

Peat and peatland

Where proposals are on peatland or carbon rich soils (CRS), the following should be submitted to address SEPA's requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage). Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not.

It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice.

The submission should include a series of layout drawings at a usable scale showing all permanent and temporary infrastructure, with extent of excavation required. These plans should be overlaid on the following:

a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy in NPF4, which may be more than that outlined in the Peatland Survey – Guidance on Developments on Peatland (2017);

Peat depth survey showing interpolated peat depths;

Peatland condition mapping – the Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category.

The detailed series of layout drawings above should clearly demonstrate that development proposals avoid any near natural peatland and that all proposed excavation is on peat less than 1m deep.

The layout drawings should also demonstrate that peat excavation has been avoided on sites where this is possible. On other sites where complete avoidance of peat and carbon rich soils is not possible then it should be clearly demonstrated that the deepest areas of peat have been avoided and the volumes of peat excavated have been reduced as much as possible, first through layout and then by design making use of techniques such as floating tracks.

The Outline Peat Management Plan (PMP) must include:

A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes;

A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including borrow pits (quantities used in making good areas disturbed by development must be the minimum required to achieve the intended environmental benefit and materials must be suitable for the proposed use), (2) used in on and off site peatland restoration, and (3) disposed of, and the proposed means of disposal (if deemed unavoidable after all other uses of excavated peat have been explored and reviewed);

Details of proposals for temporary storage and handling of peat - Good Practice during Wind Farm Construction outlines the approach to good practice when addressing issues of peat management on site and minimising carbon loss;

Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation, including evidence on the suitability of the peat and evidence that the quantity used matches and does not exceed the requirement of the proposed use. If peat is to be used in borrow pits on site, SEPA will require sections and plans including the phasing, profiles, depths and types of material to be used;

Use of excavated peat in areas not disturbed by the development itself is now not a matter SEPA provides planning advice on.

Please refer to Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot 2023, and the Peatland ACTION – Technical Compendium which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that SEPA can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to accommodate any regulatory requirements. Further guidance on this may be found in the document Is it waste - Understanding the definition of waste.

GWDTE and existing groundwater abstractions

Groundwater Dependent Terrestrial Ecosystems (GWDTE) are protected under the Water Framework Directive. Excavations and other construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas.

A National Vegetation Classification (NVC) survey should be submitted which includes the following information:

a) A set of drawings demonstrating all GWDTE and existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it.

If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice and the minimum information we require to be submitted.

Please note that due to discrepancies in habitat definition and ambiguity in correspondence with NVC types we do not accept the use of The UK Habitat Classification System (UKHab) as an alternative to NVC.

Forest removal and forest waste

If forestry is present on the site, the site layout should be designed to avoid large scale felling, as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality.

The submission must include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.

Pollution prevention and environmental management

The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements. Please refer to the Guidance for Pollution Prevention (GPPs) and our water run-off from construction sites webpage for more information.

Life extension, repowering and decommissioning

Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with SEPA guidance on the life extension and decommissioning of onshore wind farms. Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.

The discarding of materials as waste should be avoided. However, if there is an intention to discard materials then further guidance on this may be found in the document Is it waste - Understanding the definition of waste.

AVIATION STAKEHOLDERS

NATS has concerns that unmitigated the proposed developer has the potential to degrade the performance of the Sandwick Radar system located on the other side of Stornoway. The risk would be that elements of the proposed development would reflect sufficient energy to become the source of false detections, however this will depend on the final layout and scale of the buildings within the development. It is likely that should a reflection risk be identified that this could be mitigated via adaptation of the radar's processing algorithms. At this time NATS would like our concerns noted and request that aviation be considered as a factor in subsequent phases of the planning process.

HIAL - The development has been assessed using the criteria below from the Scoping Report:

Easting	Northing	Height (AGL)
140423	931950	27.5m

With reference to the above proposal, our preliminary assessment shows that, at the position, the proposed development does not impact the safeguarding criteria and operation of Stornoway Airport. However, due to the location of the development to Stornoway Airport, we would expect potential aviation impact to be taken into consideration, noting that aspects of the development require to be confirmed. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) then as a statutory consultee HIAL requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted. HIAL reserve the right to object at this time.

MoD - The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I can confirm that, following review of the application documents, the proposed development falls outside of MOD safeguarded areas and does not affect other defence interests. The MOD, therefore, has no objection to the development proposed.

MET Office - The substation is approx. 14 km from the weather radar at Drium-A-Starraig and wont have any impact on the data collected or the services derived from it. Therefore we have no comments.

COMMUNITY COUNCILS

NORTH LOCHS COMMUNITY COUNCIL (NLCC)

Response to: 24/00325/SCO – Scoping Opinion Report – Lewis Hub, Arnish Moor

A. General Comments from NLCC

The proposed new Lewis Hub 400Kv Substation and HVDC Converter Station, as detailed in the EIA Scoping Report Consultation, falls within the boundary of the North Lochs Community Council.

We understand that at this stage we are being requested to respond only on the *scope of the EIA*, not *the merits of the proposal or potential impacts of the development.* The comments below are reflective of this.

Additionally, while it is a duty on Community Councils to *ascertain, co-ordinate and express the views of the community which it represents,* we wish it to be noted that we have not had the time, or opportunity, to ascertain wider community views as yet.

The NLCC are interested in understanding if any subsequent proposal will look to optimise walking routes and access tracks for the local communities of North Lochs.

B. Invited Questions

1. What environmental information do you hold or are aware of that will assist in the EIA described here for the Proposed Development?

While we do not hold relevant environmental data ourselves, we would recommend contacting the following groups:

- North Lochs Historical Society
- North Lochs Heritage Project
- North Lochs Grazings Committees
- Curracag – Outer Hebrides Natural History Society

2. Do you agree with the proposed approach for collection of baseline data, and that the range of surveys across particular topics is sufficient and appropriate to inform the assessment of environmental effects?

We defer to the advice of Nature Scot, SEPA, HES and Comhairle nan Eilean Siar regarding baseline data and its appropriateness for informing the assessment of environmental effects.

3. What other relevant existing baseline data do you expect to be taken into account?

4. Are there any key issues or possible effects which have been omitted?

Local Heritage Resources

In addition to the records held by CnES and Historic Environment Scotland on local heritage assets for this area, there are two local groups in North Lochs area who can advise on relevant local records, these are: North Lochs Heritage Project and North Lochs Historical Society.

The neolithic stone circle Druim Dubh on the A859 should be included in the assessment of local heritage resources.

Impacts on Human Health and Major Accidents

We would like to see consideration of impacts on human health included in the EIA, such as: moor fire risk, emissions, EMF, major accidents, noise and lighting, lightning strikes, peat slides etc.

Impacts on Active Travel (and related Road Safety)

We would like to see impacts on active travel and related road safety considered in the EIA and Transport Assessment. This should consider the cumulative effects of the wider Western Isles Connection Project. We have written a separate letter requesting urgent consideration of an extension to the cycle refuge lane on Lochs Rd (A859) between the Creed Recycling Centre and the Creed Bridge, south of Stornoway. This is to address safety concerns for cyclists and road users arising from the proposal and wider impacts from the Western Isles Connection Project (see attached letter).

Impacts on Flooding of the A859

A section of the A859 immediately south of the proposed site entrance is prone to flash flooding and cars regularly aquaplane off the road when this happens as they are generally travelling at speed along this section. A number of drains and streams that contribute to this issue cross the proposed SSEN site area. We would hope that the impacts of the proposed development on this issue are fully assessed in the EIA and that any subsequent proposal improves or enhances the drainage of this section of the A859.

Impacts on Leisure and Learning

We would welcome consideration of impacts on leisure and learning users in the area, particularly:

- Angling Interests on the Creed River (access, water quality, fisheries, ground disturbance etc)

- Equestrian users of the Lochside Arena (noise, access, lighting, disturbance etc)
- Karting and Motocross Circuit at Lewis Karting Centre (access, noise, disturbance etc)
- Macaulay College students and staff (access, noise, EMF, lighting, emissions etc)
- Walkers on the Hebridean Way (Walk Route)

Noise Sensitive Receptors

Consideration should be given to additional noise sensitive receptors at Lochside Area (equestrian facility) and Creed Recycling Centre (place of work).

Viewpoints and Sensitive Receptors

We would like to add a number of additional viewpoints / sensitive receptors for consideration:

- The site is in a prominent location on the key approach to Stornoway. Stornoway is considered a 'main settlement' in the Outer Hebrides Local Development Plan (2018) and policy DS1 Development Strategy states that: *"Siting and Design should be approach to the characteristics of main settlements and should contribute positively to the key approaches to the settlement".* The current viewpoints on the A859 do not fully capture a panoramic approach of the site approaching from the South. We would like to see an additional viewpoint, just south of the current viewpoint number 6. We would suggest this is positioned this just north of the Creed Park Recycling Centre turnoff.

- We would also suggest consideration of a viewpoint further south on the A859 on the brow of the hill at the Halfway Garage. This is in proximity to the remains of a Neolithic Stone Circle called 'Druim Dubh". Although this is unrecorded, it is of local historical interest.

- We would also suggest a prominent location along the Pentland Road is included where the site is visible from the Hebridean Way walking route.

Cumulative Impact

Assessments for Cumulative Impact (for all topics) should include all proposed and consented electricity generating stations in the wider area e.g. Stornoway Wind Farm, Grimshader WindFarm, Beinn Ghrideag Wind Farm, SSE Depot etc.

- **Do you agree with the list of issues to be scoped out, and the rationale behind the decision?**

- We believe it may be necessary to scope a Flood Risk Assessment and Watercourse Crossing Schedule into the EIA to consider impacts arising from the development on surface water flooding that arises on the A859 (adjacent to the proposed site entrance) during periods of heavy rain. A number of

watercourses and drains (which contribute to these events) cross the proposed development site. We would look to SEPA and the Comhairle to further advise on this issue.

- We would ask for the Neolithic Stone Circle 'Druim Dubh" to be considered under Heritage Assets. Although unrecorded, it is of locally historical interest.

- We believe consideration of both the 'construction' and 'operation' phase should be scoped back into the EIA for the Traffic and Transport section. This section of the A859 is currently dangerous for cyclists with frequent overtaking on the double lined section with an adjacent blind summit and concealed entrance at Macaulay Farm. The increase in heavy and slow-moving plant vehicles crossing blindly into the site entrance on the A859 and on/off the Arnish Road will have a major impact on cyclist and road user safety. We are calling for urgent consideration of an extension of the cycle refuge lane along this section of the road, as detailed in the attached letter.

- Consideration of 'Tourism and Recreation' should be scoped into the EIA, with particular regard to: Equestrian, Hebridean Way Walk Route; Cycling; amenity of Lews Castle Grounds and Karting in the vicinity. Additionally, the site is in a prominent location on the key approach to our main town. Stornoway is considered a 'main settlement' in the Outer Hebrides Local Development Plan (2018) and policy DS1 Development Strategy states that: *"Siting and Design should be approach to the characteristics of main settlements and should contribute positively to the key approaches to the settlement".*

- We believe impacts on 'Population and Human Health', 'EMF' and 'Major Accidents and Disasters' should be scoped into the EIA, with particular regard to: moor fire risk, emissions, EMF, major accidents, noise, lighting, lightning strikes, peat slide etc.

- Inclusion of 'Air Quality and Climate' should be considered with regards to equestrian users at the Arena and animal and staff at Macaulay Farm.

- **Of those issues identified for assessment, which do you consider the most important/material and which the least?**

The proposed development site lies within the boundary of the North Lochs Community Council.

We consider the most important issues for our communities will be:

- Impacts on Road Safety, Traffic Management and Active Travel Routes
- Impacts on Flooding on the A859 (watercourse runs across development site)
- Impacts on Human Health (including moor fire risk, lightning strikes, peat slide, emissions etc)

- Impacts on Leisure, Learning, Tourism and Recreation
- Impacts on Cultural Heritage Assets (including cumulative impact)
- Cumulative Impact (for all topics) should include all proposed and consented electricity generating stations in the wider area (e.g. Stornoway Wind Farm, Grimshader WindFarm, Beinn Ghrideag Wind Farm, SSE Depot etc).

STORNOWAY COMMUNITY COUNCIL (RE NOISE)

Having checked through the various documents in the Scoping Opinion on the CNES website, we would like to suggest one change. Fig 10.1 - noise receptors - these are proposed to be placed on main roads and/or the edge of populated areas. Our particular concerns as regards noise pollution, both during the three years plus of construction and afterwards, are on the effect this development will have on the amenity aspect of the Castle Grounds, which as you will know, is enjoyed by many people from all ages and walks of life.

Therefore please find attached a JPEG showing four suggested additional locations (marked as yellow crosses) for noise receptors within or close to the Castle Grounds. These are on established and well-used paths, or in the case of the most southerly proposed receptor, near the start of a new path which goes towards the Deep Water Facility. This has been discussed with SSEN at their Consultation Meeting earlier this month, and they seemed to be agreeable in principle to this approach.

LAND USE

THE CROFTING COMMISSION

The general position of the Crofting Commission in relation to planning applications concerning croft land is that:

- The siting of any proposed development should not restrict the continuing cultivation of a croft
- The siting of any proposed development should not restrict proper access to all other areas of a croft
- The siting of any proposed development avoids using the better quality land on a croft
- Consideration be given to the number of existing developments relating to a croft (A croft should retain its identity as a crofting unit)

Generally, the Commission is supportive of developments on croft land where there is an operational need that will be beneficial to the croft.

ENVIRONMENTAL HEALTH

CONSUMER & ENVIRONMENTAL SERVICES (C&ES)

Population and Human Health

In terms of C&ES's remit- ok with this being scoped out.

Electric and Magnetic Fields

In terms of C&ES's remit- ok with this being scoped out. Noted that some of the reasoning and distances for EMF not being an issue to the nearest properties at the proposed site relate to "Fanellan Road". Recommend reviewing to ensure reflects this site (where distances are likely to be similar).

Air Quality and Climate

In terms of C&ES's remit- ok with this being scoped out.

Noise (& Vibration)

Agree with approach to noise and ok with vibration being scoped out. Vibration from blasting can be controlled via planning conditions, as detailed in the Scoping report.

UTILITIES

SCOTTISH WATER

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

Scottish & Southern Electricity Networks

TRANSMISSION

TECHNICAL APPENDIX 4.3 CONSULTATION REGISTER

Consultee Name	Stage	Date	Topic	Consultee Comments	Response / Comment
Statutory					
Comhairle nan Eilean Siar (CnES)	Scoping Opinion	26/11/2024	Cumulative Assessment	If not included in the baseline, the Stornoway Deep Water project (24/00185/HROSCO) should be added to the list for inclusion within the EIAR for cumulative impact assessment.	The list of cumulative developments that have been considered within the EIAR is presented in **Chapter 4: EIA Process and Scope (EIAR Volume 2)**; the Stornoway Deep Water project is included within this list.
			LVIA	*ZTV Resolution* The resolution of the ZTV submitted is very poor. The CnES can accept high resolution files via Sharepoint and request that a High Resolution version is submitted as part of the EIA Report. When selecting colours for overlay, avoid using colours that are common on map bases. For example, ensure that greens and blues cannot be confused with woodland and water. Ensure that a colour key is clear and include all relevant analysis details. Include a method statement that clearly describes how the analysis was done and how it is presented. The use of green on the grayscale map base presented on ZTVs Figs 4.2; 4.2 and 4.3 is not easily read. The Comhairle Archaeology Service raise concerns that the scale of impact on Landscape and Visual Amenity is not currently sufficiently clear to form a clear view and provide conclusive advice.	Noted. A revised ZTV drawing was provided to CnES prior to receipt of the Scoping Opinion, with revised colour key, to assist in better understanding the scale of potential impact on landscape and visual amenity.
				Labelling All A and B Roads identified by number should also include a descriptive reference e.g. Vehicle travellers heading south on the A857; Barvas Moor Rd; People traveling in both directions on the A859; to from Lochs/Harris; Road users heading west on the A866; from Point etc.	Noted; this convention has been used throughout the Landscape and Visual Impact Assessment (LVIA).
				Colour Option Given the scale and height of the proposed buildings, CnES welcome the opportunity to contribute to possible colours of external fabric; materials and colours should be neutral or make a positive contribution to the character of the surrounding area	An Environmental Colour Assessment has been undertaken as part of the LVIA and is included within **Technical Appendix 5.4 (EIAR Volume 4)**.
				LVIA Scope CnES agree with the methodology to be adopted for the LVIA and with the Study Area being defined as 25km from the hub location. Would expect the EIAR to have a particular focus on an area within 5km of the building where significant adverse landscape and visual impacts are most likely to occur.	Noted.
				Scoped Out CnES agree that Linear Crofting LCT; and dispersed crofting are scoped out. CnES agree that effects on the NSA and effects on Wild Land (WLA30 and WLA33) should be scoped out of the EIAR assessment. CnES is content with the scoping out of theoretical visibility as described in paragraphs 4.6.5 to 4.6.11. The justification proposed is accepted for scoping out the following from Route Assessment: • North bound vehicle travellers on the A857; • The A858; • East bound road users on the A886; • North bound vehicle travellers on the B895; • Road userstravelling south on the B897; • Hebridean Way Cycle Route	Noted.
				Viewpoint Selection Additional Viewpoints to be screened as potentially suitable for generation of wireframes/Visualisations: • Sandwick cemetery entrance - NB 143993 932581 • Lower Sandwick - NB43930 3174 or slightly different location to be selected in the field • Creed Bridge car park - NB 40436 32534 • A point NW corner of the golf course - NB 41342 33906 North Lochs Community Council highlights that: • The current viewpoints on the A859 do not fully capture a panoramic approach of the site approaching from the South. We would like to see an additional viewpoint, just south of the current viewpoint number 6. We would suggest this is positioned this just north of the Creed Park Recycling Centre turnoff. • They further suggest consideration of a viewpoint further south on the A859 on the brow of the hill at the Halfway Garage. Note: OHLDP Policy DS1 Development Strategy states that: "Siting and Design should be approach to the characteristics of main settlements and should contribute positively to the key approaches to the settlement".	The final lists of viewpoints was agreed with CnES by email during November 2024, and is detailed within **Chapter 5: Seascape, Landscape and Visual Impact Assessment (EIAR Volume 2)**.
				Depending on the project design and final location of the substations, the assessment will require views of the development from within and on approaches to settlements, (visual amenity from settlements 2km). CnES welcomes consultation on the RVAA as the project design is refined	The LVIA includes an assessment of sequential routes. The LVIA includes an assessment from a number of residential locations (Newton, Plasterfield, Lower Sandwick and Olivers Brae/Cemetery which are representative of views from settlements. The RVAA assesses the effects of the Proposed Development on the residential amenity of properties within 250m as recommended in paragraph 4.7 of Technical Guidance Note 2/19 Residential Visual Amenity Assessment, The Landscape Institute, 15 March 2019.
				General Points The ZTV drawing requires to be improved. A better contrasting colour scheme should be applied to a 'contoured' base map and it should be in an accessible detailed format.	Noted. A revised ZTV drawing is included on **Figure 6.2 (EIAR Volume 3a)**, which accompanies the cultural heritage assessment.

			Cultural Heritage	North Lochs Community Council advise that the following groups are likely to hold relevant environmental data • North Lochs Historical Society • North Lochs Heritage Projects Western Isles Historic Environment Record: https://her.cne-siar.gov.uk/	Noted.
				HES has advised the following in relation to the following four Scheduled assets within the Study Area; Note: Of the four scheduled monuments HES advise that Cnoc na Croich chambered cairn (SM6550) is likely to have the greatest potential for adverse impacts on its setting:	Noted.
				• Cnoc na Croich chambered cairn (SM6550) is located atop a wooded hillock in the grounds of Lews Castle near Stornoway. It comprises the remains of a prehistoric chambered cairn, with a covering of scrub, surmounted by a later cairn and flagpole. The hilltop is the supposed location of medieval gallows. The cairn has been incorporated into the designed landscape surrounding Lews Castle, which has restricted the relationship between the cairn and its surroundings, other than with Stornoway harbour. Prior to this the cairn would have been visible from throughout the surrounding area and be provided with wide views in all directions, including towards the development site. Given the topography it is likely that the proposed development would be clearly visible in outward views from the monument. There is also the potential for the development to be visible in the background of key inward views of the cairn from the east. These impacts should be assessed through the use of a detailed ZTV and photomontages as required. CnES welcome that this asset will be Scoped into the EIA assessment, however at this stage it is not possible to assess the severity of these impacts on the setting of the monument. • Arnish Point, gun emplacements (SM5347) comprise the remains of a WW2 emergency coastal battery surrounded by the remains of a hutted encampment, access roads and a service conduit. Its setting is focused on key views associated with the approaches along the sea and the mouth of Stornoway Harbour. The proposed development would be inland of the key views associated with the setting of this monument. There is the possibility that infrastructure may be present in the background of inward views of the gun emplacements from the sea. CnES welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment. • Loch Arnish, dun (SM5397) comprises an Iron Age dun located on an islet within a loch. It is located to the south-east of the development site, with the access road to Arnish running along the northern end of the loch. Whilst the setting of duns and brochs and forts often includes a visual relationship to other broadly contemporary Iron Age sites in the landscape, in the Western Isles duns and brochs were often located on islets in lochs, with the water used either or both as a form of defence and to create a rather more defined setting. Although it is unlikely that the proposed development would be visible from the dun, it may be visible in the background of some views of the dun from the southern or eastern shores of the loch thus potentially intrude into dun's relationship with the loch. CnES welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment. • Druim Dubh stone circle (SM5504) is located to the south-west of the development site and comprises an elliptical ring of fallen standing stones. The circle contains sixteen evenly spaced stones. Nine of the stones are buried beneath peat while the seven visible stones have been revealed by peat-cutting. There are remains of sockets with packing stones beside most of the stones. Positioned on a low but prominent flat-topped hillock, it overlooks reasonably flat moorland on all sides and when all stones were standing it would have been widely visible. Whilst there is small-scale modern development to its east and an overhead line to its north-west, these structures so not overly affect those wider views or overwhelm the monument.	A focussed assessment of the impact on these monuments, including Cnoc na Croich chambered cairn (SM6550) is included in **Chapter 6: Cultural Heritage (EIAR Volume 2)**. A ZTV has been considered **Figure 6.2 (EIAR Volume 3a)**, a photomontage was not produced from Cnoc na Croich chambered cairn (SM6550) as the cairn is completely surrounded by trees and the photomontage would not show the Proposed Development through the trees. A wireline **Figure 6.4 (EIAR Volume 3b)** has instead been produced.
				CnES Archaeology Service advise that Druim Dubh Stone Circle must be used as a Viewpoint for visualisation (Heritage) and additionally, on account of the poor quality of the ZTV proposed viewpoints will require further consultation.	Druim Dubh stone circle is included as a viewpoint and a visualisation is included as **Figure 6.3 (EIAR Volume 3b)**. A revised ZTV drawing was provided to CnES prior to receipt of the Scoping Opinion, with revised colour key.
				Sensitive Receptors The conclusion that the proposed development will not have a significant effect on the setting of the GDL (para 5.3.1) seems premature at this stage. CnES therefore does not accept, without further detailed assessment, the statement in 5.3.1 i.e. that the proposed development is considered unlikely to have a significant effect on the setting of the surrounding designated heritage assets, the closest of which is the Lews Castle and Lady Lever Garden and Designed Landscape (GDL 00263). HES noted as follows • *We note that the preferred site is located immediately to the south of the Category A listed Lews Castle (LB18677) and the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263). We welcome that these heritage assets will be scoped into the EIA assessment. We recommend the use of a detailed ZTV and photomontages to inform the setting assessment.*	A focussed assessment of the impact on Lews Castle (LB18677) and the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263) is included in **Chapter 6: Cultural Heritage (EIAR Volume 2).**

				Methodology The Archaeology Service of CnES highlighted that further aspects within the the methodology of the scoping report should be considered or modified and included within the EIA: - The proposed development comprises two sites, located each side of the main road. Arnish North includes part of the former Lewis Chemical works historic site. Arnish Moor in the southern area is in an elevated position and comprises of reclaimed farmland and peat moorland. The Cultural Heritage Chapter omits to identify the potential for unknown archaeological features or deposits, although the extensive peat deposits are identified in other chapters. The location of two prehistoric scheduled monuments gives indicative potential for Neolithic or Early Bronze Age deposits with or below the peat. This is borne out by earlier coring data and c14 analysis, recovered from the Stornoway Substation site. - It is noted that further consultation will take place regarding additional mitigation measures; the Archaeology Service is likely to recommend some sort of pre-construction assessment. This is likely to include assessment of peat probe data to inform a peat coring strategy for palaeo-environmental remains, limited evaluation trenches, dependant on local environmental conditions and followed up by a program of strip, map and record watching briefs. Later period upstanding archaeological sites are likely to be dealt with through survey and excavation or by protective fencing.	*The archaeological potential and the potential of peat deposits is assessed in EIAR Volume 2, Chapter 6: Cultural Heritage: Archaeological Potential* •*Mitigation is discussed in EIAR Volume 2, Chapter 6: Cultural Heritage: Mitigation* •*A revised ZTV is shown on Figure 6.2*
				CnES agrees with the following to be scoped out of the EIAR: - Battlefields; and World Heritage Sites; - Listed buildings within the Stornoway townscape; - Designated heritage assets that lie outside of the zone of theoretical visibility (ZTV) for the Proposed Development ((with the exception of the Category A-listed Lews Castle (LB18677) and the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263). And Stornoway War Memorial, where further evidence/justification should be provided or an assessment presented through the EIAR); and - Assessment of settings impacts on designated heritage assets more than 3 km from the Proposed Development (with the exception of Stornoway War Memorial, where further evidence/justification should be provided in the EIAR)	Focussed assessments of the impact on Lews Castle (LB18677) and the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263) and on the Stornoway War Memorial (LB 19211) are included in **Chapter 6: Cultural Heritage (EIAR Volume 2).**
			Ecology	Field Surveys and Habitat Surveys as proposed considered sufficient.	Noted.
				Pipistrelle bats, a European Protected Species (EPS) are present in and around the Lews Castle Grounds/ Garden and Designed Landscape; it is possible that there may be some suitable habitat for them in the conifer-planted areas within the red-line footprint.	As detailed in **Chapter 7: Ecology (EIAR Volume 2)**, no roosting features for bats were identified within the Ecology Field Survey Area. Habitat enhancements provided in the Landscape Management Plan would provide benefits for bats potentially using the Site.
				BNG Assessment and 10% commitment welcomed	Noted
				It is agreed that the protected areas Lewis Peatlands SAC and Tong Saltings SSSI can be scoped out of the BNG assessment, having no connectivity to the development proposal.	Noted
				The decision on whether to scope out effects on Bog habitat/ Groundwater Dependent Terrestrial Ecosystems (GWDTE) should be considered further following survey.	Potential impacts on blanket bog are assessed in **Chapter 7: Ecology (EIAR Voume 2)**, sections 7.6.7 and 7.6.8. Impacts are predicted to be not significant, but reinstatement and restoration of blanket bog is proposed. No significant impacts on GWDTE are anticipated. Hydrological/Hydrogeological assessment of potential GWDTE is provided in **Technical Appendix 9.2 (EIAR Volume 4)**.
				Note: slow worm is the only native reptile species for which suitable habitat exists on site.	Noted
			Ornithology	North Lochs Community Council advise that Curracag- The Outer Hebrides Natural History Society may hold useful information	Noted
				Field Surveys and Habitat Surveys as detailed are considered sufficient.	Noted
				CnES agree that impacts in terms of Disturbance (operational phase) can be scoped out. CnES agree that none of the following warrant inclusion in the EIA - - Red Listed Species - Scaup, Lapwing - Amber listed species: pink-footed goose, whooper swan, oyster catcher, wood sandpiper, red-breasted merganser - Schedule 1 species: great northern diver. NatureScot advise that an HRA is not required in relation to likely significant effects on the North Harris mountains SPA, or the West Coast of the Outer Hebrides SPA. In their view, there is not sufficient of an impact pathway between the development proposal and these sites to justify their inclusion.	Noted
				NatureScot considers that: • impacts upon the Schedule 1 species hen harrier and merlin are likely to be the most important at this particular site. The habitat appears especially suitable for these species. The development site is close to what has been the centre of the expanding hen harrier population in Lewis in recent years. Please review Habitat Loss (Construction and Operational Phase) in relation to this species. • Proposals for offsetting and enhancement will also be a key issue at this site.	Impacts on Hen harrier and other Schedule 1 raptors are conisdered in the **Chapter 8: Ornithology (EIA Volume 2)**. Potential disturbance impacts on hen harrier are predicted, with pre-construction surveys proposed to be undertaken to identify territories in future years. The Bird SPP (**Techical Appendix 2.3, EIAR Volume 4)** would be developed to set out working practices to avoid impacts on hen harrier and merlin.

			Hydrology, Hydrogeology, Geology and Soils	*Scoped Out* • PWS - SEPA seek further information/assurance on scoping out of Private Water Supplies given there is a PWS 250m NE of the site • Flood Risk Assessment Agreed but note: SEPA seek further details of the watercourse re-routing be provided in draft form, prior to final submission, as very little information has been provided at this stage on what is to become of these drains/watercourses. • Groundwater dependent terrestrial Ecosystems – Further information to support justification required • Watercourse Crossings – review in light of SEPA standing guidance	Further information on the PWS is provided in **Chapter 9 (EIAR Volume 2)**, the PWS is over 250m from the Proposed Development and is highly unlikely to be in hydrogeological connection to the Site. Details of surface water managemnt, which would replace existing drainage on the development footprint and ensure that there is no increase in flood risk, are provided in the Mott Macdonald drainage strategy. No re-routing of watercourses is proposed outside of the Proposed Development footprint. Hydrological/Hydrogeological assessment of potential GWDTE is provided in **Technical Appendix 9.2 (EIAR Volume 4).** A limited number of watercourse crossing locations are identified in **Chapter 9 (EIAR Volume 2)**. Design of watercourse crossings would conform with SEPA standing guidance and they are likely to be be subject to CAR Registration. Specification for watercourse crossings is set out in SSEN GEMP TG-NET-ENV-515: Watercourse Crossings, **Technical Appendix 2.2 (EIAR Volume 4).**
				Most important: • Class 1 peatland soils - Peat and peatland survey information supported by a robust Peat Management Plan (Refer to SEPA guidance). Peat surpluses and re-use options; Peat Landslide Risk.	**Technical Appendix 10.2 (EIAR Volume 4)** provides an Outline Peat Management Plan and **Technical Appendix 10.3 (EIAR Volume 4)** provides detail on PLHRA.
				• Drainage Strategy - Surface Water Management; avoiding transport of sediment to watercourses; requirement to maintain the water quality standards of the Creed River and Stornoway Harbour	The proposed drainage strategy is included in **Technical Appendix 2.1 (EIAR Volume 4)** and includes measures to ensure the water quality of surrounding water features is maintained.
			Traffic and Transport	Labelling - All A and B Roads identified by number should also include a descriptive reference e.g. A857- Barvas Moor Road.	Noted.
				Consult Comhairle Roads for any Traffic count data held. (Varies)	Noted.
				The report should include a detailed assessment of construction traffic showing the type of vehicles and forecasted trips during construction.	**Technical Appendix 12.1 Outline Construction Traffic Management Plan (EIAR Volume 4)** includes a detailed assessment of construction traffic, including types of vehicles and forecasted trips.
				Scoped out • Operational Traffic – Agreed – likely to be light good vehicles • Decommissioning Traffic – Agreed – likely to be less impact than construction phase traffic • Construction Traffic - Not agreed (see below)	Noted.
				Construction Traffic Comhairle Roads raise concerns that the construction phase of the development on traffic and transport has been scoped out; Acknowledged impacts as temporary but, given local context, they believe effects are likely to be significant. (increased traffic flows, changes to the traffic composition – increase in HGV movements carrying construction materials to site such as concrete, aggregates, plant and general construction materials as well as the transmission equipment. NLCC consider that 'construction' phase impacts should be scoped back into the EIA for the Traffic and Transport section. They advise that this section of the A859 is currently dangerous for cyclists with frequent overtaking on the double lined section with an adjacent blind summit and concealed entrance at Macaulay Farm. The increase in heavy and slow-moving plant vehicles crossing blindly into the site entrance on the A859 and on/off the Arnish Road will have a major impact on cyclist and road user safety. Transport Scotland would advise that the CTMP should consider all traffic and transport impacts including those on the mainland Trunk Roads should there be any e.g. are large indivisible loads to be shipped by road (rather than Port to Port) CnES advise that Construction Traffic requires to be thoroughly assessed and scoped into the EIA Report.	Noted. A full Traffic and Transport EIA chapter has been produced and is included as **Chapter 12 (EIAR Volume 2)** which considers all potential construction traffic-related impacts and provides a thorough assessment of potential effects on the road network.
			Noise and Vibration	Comhairle EH agree with approach to noise assessment. NLCC request that consideration should be given to additional noise sensitive receptors at Lochside Area (equestrian facility) and Creed Recycling Centre (place of work).	Noted.
				Comhairle EH agree with vibration being scoped out. (Vibration from blasting can be controlled via planning conditions, as detailed in the Scoping report).	Noted
			Population and Human Health	CnES request that the scoping out of this issue is reviewed, including impacts and effects in isolation and in cumulation with the other identified developments –additional workforce numbers likely to be imported; how they will be housed; facilities provided; capacity of existing health care services e.g. Dentist, GP and Hospital Services. The developer should consult with the Director of Public Health in the Outer Hebrides, NHS Western Isles. A housing strategy should also be prepared.	A separate Socio-Economic Statement has been prepared for the Proposed Development and will be available to view on the project website: https://www.ssen-transmission.co.uk/projects/project-map/western-isles/, which considers the potential impacts from numbers of construction workers. In addition, SSEN has prepared an overarching Housing Strategy document for its projects (available at: https://www.ssen-transmission.co.uk/globalassets/documents/housing-strategy/ssent-housing-strategy-2024-)
			Climate Change	Review and consider if there are significant positive benefits to climate change arising from the Proposed Development.	Noted.

			Socio-economics, Tourism, and Recreation	CnES agree that, while this may be scoped out of the EIA, a standalone assessment of socio-economic impacts in the context of evidence of compliance with national and local development policy is required. Consideration should be given to likely impacts upon Tourism and Recreation' with particular regard to impacts and mitigation measure for potential negative effects on : Equestrian, Hebridean Way Walk Route; Cycling; amenity of Lews Castle Grounds and Karting in the near vicinity of the development	A separate Socio-Economic Statement has been prepared for the Proposed Development and will be available to view on the project website: https://www.ssen-transmission.co.uk/projects/project-map/western-isles/
			Land-use	CnES agree that this topic can be scoped out, as the site is not high quality agricultural quality land - information may be held by North Lochs Grazing Committee.	Noted.
			EMF	Scoped Out - Agreed. Noted that some of the reasoning and distances for EMF not being an issue to the nearest properties at the proposed site relate to "Fanellan Road". Recommend reviewing to ensure reflects this site (where distances are likely to be similar).	Noted.
			Major Accidents and Disasters	Scoped out - agreed subject to assessment of peat and peat landslide risks	Noted.
			Air Quality	Scoped out - Agreed.	Noted.
			Archaeology and Cultural Heritage	The Archaeology Service would highlight that further aspects within the methodology of the scoping report should be considered or modified and included within the EIA. • 5.3.1 – The conclusion that the proposed development will not have a significant effect on the setting of the GDL;, seems premature at this stage. • The proposed development comprises of two sites, located each side of the main road. Arnish North includes part of the former Lewis Chemical Works historic site. Arnish Moor in the southern area is in an elevated position and comprises of reclaimed farmland and peat moorland. The Cultural Heritage Chapter omits to identify the potential for unknown archaeological features or deposits, although the extensive peat deposits are identified in other chapters. The location of two prehistoric scheduled monuments gives indicative potential for Neolithic or Early Bronze Age deposits with or below the peat. This is borne out by earlier coring data and c14 analysis, recovered from the Stornoway Sub Station site. • It is noted that further consultation will take place regarding additional mitigation measures(5.5.13); the Archaeology Service is likely to recommend some form of pre-construction assessment. This is likely to include assessment of peat probe data to inform a peat coring strategy for palaeo-environmental remains, limited evaluation trenches, dependant on local environmental conditions and followed up by a program of strip, map and record watching briefs. Later period upstanding archaeological sites are likely to be dealt with through survey and excavation or by protective fencing. • The Archaeology Service has concerns that the scale of impact on the Landscape and Visual Amenity is not currently clear enough to form a view. The ZTV drawing could be improved if a better contrasting colour scheme was applied to a 'contoured' base map and it was in an accessible detailed format.. Additionally, proposed viewpoints will require further consultation and must include Druim Dubh Stone Circle.	•A focussed assessment of the impact on Lews Castle (LB18677) and the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263) is included in **EIAR Volume 2, Chapter 6: Cultural Heritage: Potential Operational Effects** •The archaeological potential and the potential of peat deposits is assessed in **EIAR Volume 2, Chapter 6: Cultural Heritage: Archaeological Potential** •Mitigation is discussed in **EIAR Volume 2, Chapter 6: Cultural Heritage: Mitigation** •A revised ZTV is shown on **Figure 6.2 (EIAR Volume 3a)** •A focussed assessment of the impact on Druim Dubh, stone circle (SM5504) is included in **EIAR Volume 2, Chapter 6: Cultural Heritage: Potential Operational Effects** and a photomontage produced **Figure 6.3 (EIAR Volume 3b)**
			Traffic and Transport	The construction phase of the development may be temporary but it is significant and there are concerns that this has been scoped out. Report should include a detailed assessment of construction traffic showing the type of vehicles and forecasted trips during construction with a CTMP. Although the operational phase will have less impact, the report should give an indication of the vehicles to be used and frequency. Any bridges or structures crossed as part of the Abnormal Load Route should be assessed beforehand. Mitigation works may be required along this route to allow for the delivery of units. Much of the road network is on peat deposits and as such the whole road network could be classed as potentially sensitive. Developer should carry out Pre works condition surveys, and will be responsible for damages to the road network as a result of the project. Peak traffic periods from other consented major wind turbine developments and this project should not coincide.	This is addressed within C**hapter 12 (EIAR Volume 2)** and **Technical Appendix 12.1 (EIAR Volume 4)**
SEPA		30/09/2024	Sensitvity drawings	To avoid delay and potential objection, the EIA submission must contain a series of scale drawings of sensitivities, for example peat depth, peat condition, Groundwater Dependent Terrestrial Ecosystems (GWDTE), proximity to watercourses, overlain with proposed development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, then reduce and then mitigate significant impacts on the environment.	A variety of sensitivity drawings are provided in the EIAR. **Figures 9.3-9.4 (EIAR Volume 3a)** show proximity to watercourses, while **Figures 9.2.1-9.2.7 (EIAR Volume 4)** accompany the GWDTE assessment (**Technical Appendix 9.2, EIAR Volume 4**) and show potential GWDTE habitats. Other relevant sensitivites are show on the figures that accompany **Technical Appendix 10.1 (Peat Depth Survey Report), 10.2 (Outline Peat Management Plan) and 10.3 (Peat Landslide Hazard Risk Assessment) (EIAR Volume 4).**
			Peat	Much of the site is on peat; therefore SEPA expects the application to be accompanied by a comprehensive site-specific peat management plan. SEPA is streamlining its approach to consultations concerning peat and carbon rich soils and is now focusing their planning advice on the avoidance, minimisation, and use of peat in areas disturbed by construction activities. For advice on peatland restoration; developers should instead refer to NatureScot guidance.	A site-specific Outline Peat Management Plan is included as **Technical Appendix 10.2 (EIAR Volume 4)**.
				Where proposals are on peatland or carbon rich soils (CRS), the following should be submitted to address SEPA's requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage).	Noted.
				It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice. Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not.	This is addressed within **Chapter 10: Geology and Soils (EIAR Volume 2).**

				The submission should include a series of layout drawings at a usable scale showing all permanent and temporary infrastructure, with extent of excavation required. These plans should be overlaid on the following: (a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy in NPF4, which may be more than that outlined in the Peatland Survey – Guidance on Developments on Peatland (2017); (b) Peat depth survey showing interpolated peat depths; (c) Peatland condition mapping – the Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category.	Peat depth survey information, including pet probe locations and interpolated peat depths, is described and illustrated within **Technical Appendix 10.1 (EIAR Volume 4)**. Peat condition mapping is shown on **Figure 7.4 (EIAR Volume 3a).**
				The detailed series of layout drawings above should clearly demonstrate that development proposals avoid any near natural peatland and that all proposed excavation is on peat less than 1m deep.	as above
				Drawings should demonstrate that peat excavation has been avoided on sites where possible, however where this is not possible, it should be demonstrated that deepest areas of peat have been avoided and volumes of peat excavated have been reduced as much as possible, first through layout and then by design making use of techniques such as floating tracks.	As above. **Chapter 3 (EIAR Volume 2)** describes the site selection and design evolution process, which has included identification of embedded mitigation measures, including avoidance of deep peat.
				The outline PMP must include: a)A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes; b)A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including borrow pits (quantities used in making good areas disturbed by development must be the minimum required to achieve the intended environmental benefit and materials must be suitable for the proposed use), (2) used in on and off site peatland restoration, and (3) disposed of, and the proposed means of disposal. c)Details of proposals for temporary storage and handling of peat - Good Practice during Wind Farm Construction d)Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation, including evidence on the suitability of the peat and evidence that the quantity used matches and does not exceed the requirement of the proposed use. If peat is to be used in borrow pits on site, SEPA will require sections and plans including the phasing, profiles, depths and types of material to be used; e)Use of excavated peat in areas not disturbed by the development itself is now not a matter SEPA provides planning advice on. Please refer to Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot 2023, and the Peatland ACTION – Technical Compendium which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that SEPA can identify any regulatory implications of the proposed activities.	The Outline PMP is provided in **Technical Appendix 10.2 (EIAR Volume 4)** and includes this information.
			GWDTE and existing groundwater abstractions	Groundwater Dependent Terrestrial Ecosystems (GWDTE) are protected under the Water Framework Directive. Excavations and other construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas. A National Vegetation Classification (NVC) survey should be submitted which includes the following information: a) A set of drawings demonstrating all GWDTE and existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it. b) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice and the minimum information we require to be submitted. Please note that due to discrepancies in habitat definition and ambiguity in correspondence with NVC types we do not accept the use of The UK Habitat Classification System (UKHab) as an alternative to NVC.	The assessment of potential impacts on GWDTE is presented in **Technical Appendix 9.2 (EIAR Volume 4**). Details of the NVC survey findings are provided in **Chapter 7 (EIAR Volume 2) and Technical Appendix 7.1 (EIAR Volume 4).**
			Hydrology	As stated in Section 8 of the Scoping Report, several agricultural drains are present within the proposed footprint of development. Section 8.5.1 states that "a surface water drainage strategy (including proposals for re-routing of the watercourse in the north of the site) shall be prepared in consultation with SEPA and submitted as an appendix to the EIAR". SEPA would suggest that further details of the watercourse re-routing be provided in draft form, prior to final submission, on what is to become of these drains/watercourses. These will also require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (As Amended) (CAR). It is also unclear the current state of these drains/watercourses, as it is suggested that further downstream that these present as more naturalised channels, which we would not want to see adversely impacted.	Details of surface water managemnt within the development footprint are provided in the Mott Macdonald drainage strategy (**TA2.1 Drainage Strategy**). Flow rates from the site shall be restricted to the 1 in 2 year Greenfield Runoff rate such that there is no significant alteration to downstream flood risk or hydromorphology of more naturalised channels.

				SEPA notes that Section 8.5.2 of the Scoping Report has scoped out Private Water Supplies from further assessment; however, Section 8.2.8 states that there is a Private Water Supply present approximately 250 m northeast of the site. Existing groundwater abstractions should be demonstrated to be outwith 250m of all excavations deeper than 1m. If this buffer cannot be achieved or is marginal, then further assessment should clearly demonstrate that there will be no hydrological connection, and that excavations will not impact on this supply, as is suggested.	Further information on the PWS is provided in **Chapter 9 (EIAR Volume 2)**, the PWS is over 250m from the Proposed Development and is highly unlikely to be in hydrogeological connectiojn to the Site. The PWS is not in hydrological connection to the site.
				The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors. Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide.	A limited number of watercourse crossing locations are identified in **Chapter 9 (EIAR Volume 2)**. Design of watercourse crossings would conform with SEPA standing guidance and they are likely to be be subject to CAR Registration. Specification for watercourse crossings is set out in SSEM GEMP TG-NET-ENV-515: Watercourse Crossings **Technical Appendix 2.2 (EIAR Volume 4).**
				The submission must include a set of drawings showing: a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses; b) A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works; c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all lochs and watercourses within 250m and showing a site-specific buffer around each loch or watercourse proportionate to the depth of excavations. The information provided needs to demonstrate that a site specific proportionate buffer can be achieved.	**Chapter 9 (EIAR Volume 2)** is supported by F**igures 9.1-9.4 (EIAR Volume 3a)** which identify all watercourses and lochs in proximity to the Site with a 50m buffer applied, as well as locations where works, including borrow pits, are proposed within 50m of a waterbody.
			Site Layout	Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. All drawings must be based on an adequate scale with which to assess the information. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible.	Noted.
			Flood Risk	Advice on flood risk is available at Flood Risk Standing Advice and reference should also be made to Controlled Activities Regulations (CAR) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities. Crossings must be designed to accommodate the 0.5% annual exceedance probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures. If it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. SEPA's Technical Flood Risk Guidance for Stakeholders outlines the information that is required to be submitted in an FRA.	Noted.
			Forest Removal	If forestry present, the site layout should be designed to avoid large scale felling. Submisssion must include drawings with boundaries of where felling will occur and description of what is proposed for this timber.	Noted.
			Pollution Prevention	The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements.	A schedule of mitigation is provided within **Chapter 14 (EIAR Volume 2)**.
			Life extension and decommissioning	Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with SEPA guidance on the life extension and decommissioning of onshore wind farms. Table 1 of the guidance provides a hierarchical framework of environmental impact. The submission must demonstrate how the hierarchy of environmental impact has been applied, including justification for not selecting lower impact options when life extension is not proposed.	Noted.
NatureScot			Ecology	NS broadly content that scoping report accurately and fairly reflects the matters to be included in the EIA. NS hold Site Condition Monitoring Information for Lewis Peatlands SPA, but this is probably too old to be of use. Para 6.2.9 - it shoud be noted that pipistrelle bats, another EPS, are also present and it is possible that there may be some suitable habitat for them in the conifer-planted areas within the red-line footprint. 6.6.3 - slow worm is the only native reptile species for which suitable habitat exists on site. NS agrees that the protected areas to be scoped out have no connectivity to the development proposal.	Noted.
			Ornithology	NS consider that impacts upon the Schedule 1 species hen harrier and merlin are likely to be the most important at this particular site. The habitat appears especially suitable for these species. The development site is close to what has been the centre of the expanding hen harrier population in Lewis in recent years. Proposals for offsetting and enhancement will also be a key issue at this site. 7.4.1 – NS do not consider that all the species listed at 7.4.1 require to be scoped in. The following do not warrant inclusion in the EIA – Red-listed species: Scaup, Lapwing; Amber-list species: pink-footed goose, whooper swan, oystercatcher, wood sandpiper, red-breasted merganser; Schedule 1 species: great northern diver. 7.6.4 NS do not consider that an HRA is required in relation to likely significant effects on the North Harris mountains SPA, or the West Coast of the Outer Hebrides SPA. In our view, there is not sufficient of an impact pathway between the development proposal and these sites to justify their inclusion.	Noted.

HES			Cultural Heritage	There are four scheduled monuments within 3km of the proposed development site that have the potential to be subject to adverse impacts on their settings. Of these, Cnoc na Croich chambered cairn (SM6550) is likely to have the greatest potential for adverse impacts on its setting. Cnoc na Croich chambered cairn (SM6550) is located atop a wooded hillock in the grounds of Lews Castle near Stornoway. It comprises the remains of a prehistoric chambered cairn, with a covering of scrub, surmounted by a later cairn and flagpole. The hilltop is the supposed location of medieval gallows. The cairn has been incorporated into the designed landscape surrounding Lews Castle, which has restricted the relationship between the cairn and its surroundings, other than with Stornoway harbour. Prior to this the cairn would have been visible from throughout the surrounding area and be provided with wide views in all directions, including towards the development site. Given the topography it is likely that the proposed development would be clearly visible in outward views from the monument. There is also the potential for the development to be visible in the background of key inward views of the cairn from the east. These impacts should be assessed through the use of a detailed ZTV and photomontages as required. We welcome that this asset will be Scoped into the EIA assessment, however at this stage it is not possible to assess the severity of these impacts on the setting of the monument.	A focussed assessment of the impact on these monuments, including Cnoc na Croich chambered cairn (SM6550) is included in **Chapter 6: Cultural Heritage (EIAR Volume 2)**. A ZTV has been considered **Figure 6.2 (EIAR Volume 3a)**, a photomontage was not produced from Cnoc na Croich chambered cairn (SM6550) as the cairn is completely surrounded by trees and the photomontage would not show the Proposed Development through the trees. A wireline has instead been produced **Figure 6.4 (EIAR Volume 3b)**.
				Arnish Point, gun emplacements (SM5347) comprise the remains of a WW2 emergency coastal battery surrounded by the remains of a hutted encampment, access roads and a service conduit. Its setting is focused on key views associated with the approaches along the sea and the mouth of Stornoway Harbour. The proposed development would be inland of the key views associated with the setting of this monument. There is the possibility that infrastructure may be present in the background of inward views of the gun emplacements from the sea. We welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment.	A focussed assessment of the impact on Arnish Point, gun emplacements (SM5347) is included in **Chapter 6: Cultural Heritage (EIAR Volume 2).** A ZTV has been included in **Figure 6.2 (EIAR Volume 3a),** which shows that viws of the Proposed Development would be partly screened by the buildings of the Arnish Fabrication Yard and the land of the Arnish moor. Key views from the gun emplacements to and from the seaward approach would be unaffected by the Proposed Development.
				Loch Arnish, dun (SM5397) comprises an Iron Age dun located on an islet within a loch. It is located to the south-east of the development site, with the access road to Arnish running along the northern end of the loch. Whilst the setting of duns and brochs and forts often includes a visual relationship to other broadly contemporary Iron Age sites in the landscape, in the Western Isles duns and brochs were often located on islets in lochs, with the water used either or both as a form of defence and to create a rather more defined setting. Although it is unlikely that the proposed development would be visible from the dun, it may be visible in the background of some views of the dun from the southern or eastern shores of the loch thus potentially intrude into dun's relationship with the loch. We welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment.	A focussed assessment of the impact on Loch Arnish, dun (SM5397) is included in **Chapter 6: Cultural Heritage (EIAR Volume 2).** A ZTV has been considered Figure 6.2, however as there is no theoretical visibility from the dun, or from the land surrounding Loch Arnish from which the dun is visible, no photomontage has been produced to inform this assessment.
				Druim Dubh stone circle (SM5504) is located to the south-west of the development site and comprises an elliptical ring of fallen standing stones. The circle contains sixteen evenly spaced stones. Nine of the stones are buried beneath peat while the seven visible stones have been revealed by peat-cutting. There are remains of sockets with packing stones beside most of the stones. Positioned on a low but prominent flat-topped hillock, it overlooks reasonably flat moorland on all sides and when all stones were standing it would have been widely visible. Whilst there is small-scale modern development to its east and an overhead line to its north-west, these structures so not overly affect those wider views or overwhelm the monument. It is possible that elements of the proposed development may be visible in outward views from the monument looking north-east, although a more detailed ZTV will be required to confirm this. Therefore, we welcome that this monument will be Scoped into the EIA and we recommend the use of a detailed ZTV and photomontages to inform the assessment.	A focussed assessment of the impact on Druim Dubh, stone circle (SM5504) is included in **Chapter 6: Cultural Heritage (EIAR Volume 2)**. A ZTV has been included in **Figure 6.2 (EIAR Volume 3a)** and a photomontage produced **Figure 6.3 (EIAR Volume 3b)**.
				HES notes that the preferred site is located immediately to the south of the Category A-listed Lews Castle (LB18677) and the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263). HES welcomes that these heritage assets will be scoped into the EIA assessment and recommends the use of a detailed ZTV and photomontages to inform the setting assessment.	A focussed assessment of the impact on Lews Castle (LB18677) and the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263) is included in **Chapter 6: Cultural Heritage (EIAR Volume 2)**.
				At this stage there is not yet sufficient clarity regarding the potential visual impacts of the development on designated heritage assets. In some instances, there may be scope to mitigate potential impacts through the use of bunding and/or planting. HES expect these issues to be explored further as the scheme is developed.	**Chapter 3 (EIAR Volume 2)** describes the consideration of alternatives during the EIA process which has focussed on the siting of infrastructure, landform and screening.
				The Stornoway Deep Water project (24/00185/HROSCO) should be added to the list for inclusion within the EIAR for cumulative impact assessment.	The list of cumulative developments that have been considered within the EIAR is presented in **Chapter 4: EIA Process and Scope (EIAR Volume 2)**; the Stornoway Deep Water project is included within this list.
				Further consultation with HES should be undertaken in advance of the submission of the planning application, and HES would welcome the opportunity to provide further comments on draft viewpoint locations, visualisations, and mitigation options should these be required.	Noted.
Non-Statutory					

The Crofting Commission	Scoping response		Land Use	The general position of the Crofting Commission in relation to planning applications concerning croft land is that: • The siting of any proposed development should not restrict the continuing cultivation of a croft • The siting of any proposed development should not restrict proper access to all other areas of a croft • The siting of any proposed development avoids using the better quality land on a croft • Consideration be given to the number of existing developments relating to a croft (A croft should retain its identity as a crofting unit) Generally, the Commission is supportive of developments on croft land where there is an operational need that will be beneficial to the croft.	Noted.
HIAL Safeguarding			Aviation	The Proposed Development does not impact the safeguarding criteria and operation of Stornoway airport. However, due to the location of the development to Stornoway Airport, HIAL would expect potential aviation impact to be taken into consideration, noting that aspects of the development require to be confirmed. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) then as a statutory consultee HIAL requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted. HIAL reserve the right to object at this time	SSEN have consulted further with HIAL following this response. On 05/12/24, HIAL confirmed that currently no further action is required, and that they would await the planning application or confirmed development parameters. Only if there was a resulting impact would HIAL look to discuss this impact and start engagement regarding potential mitigation.
MET Office			Aviation	The substation is approx. 14 km from the weather radar at Drium-A-Starraig and wont have any impact on the data collected or the services derived from it. Therefore we have no comments	Noted.
Ministry of Defence (MoD)			Aviation	The Proposed Development falls outside of the MOD safeguarded areas and does not affect other defence interests. The MOD, therefore has no objection to the proposed development	Noted.
NATS Safeguarding			Aviation	Unmitigated, the Proposed Development has potential to degrade performance of the Sandwick Radar System located on the other side of Stornoway. The risk woud be that elements of the Proposed Development would reflect sufficient energy to become the source of false detections, however this will depend on the final layout and scale of the buildings. Should a reflection risk be identified, this could be mitigated via adaption of the radar's processing algorithms. NATS would like their concerns noted and request that aviation be considered a factor in subsequent phases of the planning process.	SSEN engaged with NATS in December 2024 and provided them with project information relevant to their mitigation assessment of their equipment, it has since been determined that mitigation will be required for our development on Arnish Moor. SSEN intends to enter a mitigation contract with NATS. We are aware NATS have a requirement to have the mitigation works in place 6 months prior to the erection of the buildings and we are progressing with NATS to ensure this mitigation works is completed as early as possible and before the 6 month requirement.
JRC			Broadcasting and Electronic Communication Services	This proposal fails our basic assessment of the effect of the proposal on the following links for SSE: JESHAKS1 - JESHAKO03 0929285/1 - Fixed Link JRC must therefore object to the proposal. Due to the impact of the proposed development on these links (including obstruction of one link), we would recommend a mitigation report is commissioned for this site. This would investigate the potential of potentially moving or reparenting links, as well as other potential options, in consultation with the relevant DNO. It is not guaranteed that we will find a suitable mitigation solution.	SSEN have engaged further with JRC and have obtained a quote for a mitigation report for the site. SSEN intends to commission this work iin February 2025 to better understand any impacts on broadcasting and electronic communication services, and to ensure that suitable mitigation is put in place.
North Lochs Community Council (NLCC)			General	NLCC recommend contacting the following groups: North Lochs Historical Society, North Lochs Heritage Project, North Lochs Grazing Communities, Curracag - Outer Hebrides Natural History Society	Noted.
			Cultural Heritage	In addition to the records held by CnES and HES on local heritage assets for this area, there are two local groups who can advise on relevant local records: North Lochs Heritage Project and North Lochs Historical Society. The neolithic stone circle Druim Dubh on the A859 should be included in the assessment of local heritage resources.	Druim Dubh, stone circle (SM5504) has been included in the assessment and an assessment of potential setting impacts on this stone circle is included in **Chapter 6: Cultural Heritage, EIAR Volume 2.**
			Humand Health and Major Accidents	NLCC would like to see consideration of impact on human health included, such as moor fire risks, emissions, EMF, major accidents, noise and lighting, lightning strikes, peat slides, etc	Human health has been scoped out of the EIA, on the basis that the impacts on human health for a development of this nature and scale are limited to increased exposure to noise and changes in amenity value of residential or recreational resources. These are considered in **EIAR Volume 2, Chapter 5: Landscape and Visual Amenity** and **Chapter 11: Noise**; therefore, a specific Human Health assessment has been scoped out of the EIA.
			Traffic and Transport	NLCC would like to see impacts on active travel and related road safety considered in the EIA. This should consider the cumulative effects of the wider WICP. NLCC have written a separate letter requesting urgent consideration of an extension to the cycle refuge lane on Lochs Rd (A859) between the Creed Recycling Centre and the Creed Bridge, south of Stornoway. This is to address safety concerns for cyclists and road users arising from the proposal and wider impacts from the WICP. A section of the A859 immediately south of the proposed site entrance is prone to flash flooding and cars regularly aquaplane off the road when this happens as they are generally travelling at speed along this section. A number of drains and streams that contribute to this issue cross the proposed site area. NLCC would hope that the impacts on this issue are fully assessed in the EIA and that any subsequent proposal improves or enhances the drainage of this section of the A859. NLCC believe consideration of both the 'construction' and 'operation' phase should be scoped back into the EIA. This section of the A859 is currently dangerous for cyclists with frequent overtaking on the double lined section with an adjacent blind summit and concealed entrance at Macaulay Farm. The increase in heavy and slow-moving plant vehicles crossing blindly into the site entrance on the A859 and on/off the Arnish Road will have a major impact on cyclist and road user safety. NLCC are calling for urgent consideration of an extension of the cycle refuge lane along this section of the road, as detailed in the attached letter.	The application is accompanied by an Outline Construction Traffic Management Plan (**EIAR Volume 4: TA 12.1**) and by **EIAR Volume 2, Chapter 12: Traffic and Transport**. Whilst the views of NLCC in their scoping response indicate that operational traffic impacts should be scoped into the EIA, such impacts as detailed in the August 2024 Scoping Report indicate that the traffic associated with the operational phase would be minimal, other than at times of scheduled maintenance. CnES Roads agree with this position. The Traffic and Transport chapter of the EIAR will consider effects on sensitive receptors including those who use the local roads for leisure and recreational use. Mitigation of any significant effects will be identified. Comments relating to existing roads conditions are noted and whilst SSENT acknowledge and accept that significant effects arising from the proposed development would need to be mitigated, this has to be weighed against the extent to which it would fall upon the developer to mitigate conditions that are pre-existing unless a fair and reasonable degree of intervention is required to otherwise make the development acceptable in planning terms.

			Socio-economics, Tourism, and Recreation	NLCC would welcome consideration of impacts on leisure and learning users in the area, particularly: • Angling Interests on the Creed River (access, water quality, fisheries, ground disturbance etc) • Equestrian users of the Lochside Arena (noise, access, lighting, disturbance etc) • Karting and Motocross Circuit at Lewis Karting Centre (access, noise, disturbance etc) • Macaulay College students and staff (access, noise, EMF, lighting, emissions etc) • Walkers on the Hebridean Way (Walk Route) Consideration of 'Tourism and Recreation' should be scoped into the EIA, with particular regard to: Equestrian, Hebridean Way Walk Route; Cycling; amenity of Lews Castle Grounds and Karting in the vicinity. Additionally, the site is in a prominent location on the key approach to our main town. Stornoway is considered a 'main settlement' in the OHLDP (2018) and policy DS1 Development Strategy states that:"Siting and Design should be approach to the characteristics of main settlements and should contribute positively to the key approaches to the settlement"	
			Noise and Vibration	Consideration should be given to additional noise sensitive receptors at Lochside Area (equestrian facility) and Creed Recycling Centre (place of work).	This is considered in **Chapter 11: Noise (EIAR Volume 2).**
			LVIA	NLCC would like to add a number of additional VPs/sensitive receptors: • The site is in a prominent location on the key approach to Stornoway. The current viewpoints on the A859 do not fully capture a panoramic approach of the site approaching from the South. NLCC would like to see an additional viewpoint, just south of the current viewpoint number 6. NLCC would suggest this is positioned this just north of the Creed Park Recycling Centre turnoff. • NLCC would also suggest consideration of a viewpoint further south on the A859 on the brow of the hill at the Halfway Garage. This is in proximity to the remains of a Neolithic Stone Circle called 'Druim Dubh". Although this is unrecorded, it is of local historical interest. • We would also suggest a prominent location along the Pentland Road is included where the site is visible from the Hebridean Way walking route.	Following scoping, an additional viewpoint has been added north of the Creed Business Park at NB 39591, 31497. A further additional viewpoint has been added from a location just off the B897 at NB 38589, 30445. The Cultural Heritage Assessment viewpoint location at NB 38247, 30538 has also been assessed in the LVIA. The viewpoint from the elevated picnic bench location at Marybank (NB 39987, 33744) has been included as being representative of the Hebridean Way Walking Route. An assessment from an additional viewpoint at a location on the Pentland Road at NB 36987, 33779 has been undertaken using a wireline image.
			Cumulative Impact	Assessments for Cumulative Impact (for all topics) should include all proposed and consented electricity generating stations in the wider area e.g. Stornoway Wind Farm, Grimshader WindFarm, Beinn Ghrideag Wind Farm, SSE Depot etc.	The list of cumulative developments that have been considered within the EIAR is presented in **Chapter 4: EIA Process and Scope (EIAR Volume 2)**; developments are included when at planning application stage, approved or in construction.
			Hydrology	NLCC believe it necessary to scope a Flood Risk Assessment and a Watercourse Crossing Schedule into the EIA to consider impacts arising from the development on surface water flowing that arises on the A859 (adjacent to the proposed site entrance) during periods of heavy rain. A number of watercourses and drains (which contribute to these events) cross the proposed development site. We would look to SEPA and the Comhairle to further advise on this issue	Noted.
			Air Quality and Climate	Inclusion of 'Air Quality and Climate' should be considered with regards to equestrian users at the Arena and animal and staff at Macaulay Farm.	Noted.
RSPB Scotland				No response received	No response required
Scottish Water			Utilities	Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following: - A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity. - For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system	Noted.
Stornoway Community Council			Noise and Vibration	Fig 10.1 - noise receptors - these are proposed to be placed on main roads and/or the edge of populated areas. SCC's particular concerns as regards to noise pollution, both during construction and afterwards are on the effect on the amenity aspect of the Castle Grounds. Attached a JPEG showing four suggested additional locations (marked as yellow crosses) for noise receptors within or close to the Castle Grounds. These are on established and well-used paths, or in the case of the most southerly proposed receptor, near the start of a new path which goes towards the Deep Water Facility. This has been discussed with SSEN at their Consultation Meeting earlier this month, and they seemed to be agreeable in principle to this approach	This is considered in **Chapter 11: Noise (EIAR Volume 2).**
Transport Scotland			Traffic and Transport	Supporting Information associated with Proposed Development does not appear to include any reference to the utilisation of the trunk road network. Ultimately, traffic and transport is scoped out of the EIA. The CTMP should consider all traffic and transport impacts including those on the mainland should there be any, e.g. on the A835 in Ullapool, if construction related vehicles are to utilise the trunk road network. Should any utilisation of the trunk road be required to facilitate delivery of construction material, associated traffic management details should be provided for approval by Transport Scotland.	Noted. As outlined in meeting between SSEN and Transport Scotland on the 10th December 2024, the project is still at an early stage and we are working with our contract partners to develop a logistics plan to minimise impacts on the transport network. A draft TMP has been included in the planning submission and we are committed to providing a full Construction TMP as part of the Specified Matter Application stage that will consider material sources, shipping proposals, traffic routes, etc, including where these may utilise the A835 and Ullapool-Stornoway ferry.