

**COMHAIRLE CONSULTATION RESPONSES****CONSULTEE****Roads, Bridges & Streetlighting (EIA)****Date of response – 14 November 2023**

The EIA Report has taken in to account the effects of the projected traffic associated with the project. The sections noted below the from Site Access, Traffic and Transport Ch12 of the EIA report should be updated as more information becomes available and then implemented as stated:

- The Construction Traffic Management Plan
- Road Maintenance
- Offsite Mitigation
- Abnormal Road Traffic Management Plan
- Onsite Path Management Plan
- Staff Travel Plan

The section on Offsite Mitigation notes the upgrade of the Eishken road as part of the project. A previous consented application proposed a new road and bridge as part of the project. The Eishken road currently has a weight restriction of 8t due to the fragile nature of the road. The proposed road improvement should be substantial, in light of the construction traffic, allowing the weight restriction to be removed.

There is little detail on the proposed road upgrade, further details on the road layout and design should be submitted.

Following the design of the road and new bridge the developer should apply for Road Construction Consent (RCC) with the works carried out to CnES specification allowing adoption following completion. This application will deal with the detail of the road design and may involve a bond agreement. The original scheme had RCC consent in 2013.

At present the Abnormal Loads route is from Arnish Point. Any bridges on this route should be independently assessed beforehand.

A new access connecting to the local authority road network should be constructed in accordance with Drawing 23/00380 (*provided with response*).

Figure 3.7 shows a typical substation layout with parking adjacent to the Eishken road. "Off Road" parking and turning should be provided within the site of the substation.

The Transport Assessment Technical Appendix12.1 states it is unlikely that peak periods of other consented major wind turbine developments would coincide with this project.

**CONSULTEE****Roads, Bridges and Streetlighting (EIA)****Date of response – 20 February 2024**

In terms of the Bridge structures, we believe that the road improvement to the Eishken Road will require at least 1 bridge structure (Seaforth Head) to be replaced and 2 culvert structures (Abhainn Sgeireabhat and Abhainn Ghlas) to be replaced. Structures being classed as anything with a span width of over 0.9m in accordance with GC 300 or a road support having a retained height greater than 1.5m.

For these structures and any other additional structures which form part of the Eishken road improvement, the determination of the application stage should be able to consider an outline of the proposed structure which shows its structural form and primary material. Seaforth head bridge should be in the form of a conventional bridge deck in either reinforced or prestressed concrete. Other notable minor structures (span > 1.5m) should be closed precast or reinforced concrete box culverts. Consultation with SEPA, Nature Scotland and Fisheries may affect the design and profile of these structures.

Prior to RCC the detailed design of notable structures should be submitted to CNES for acceptance in accordance with technical approval procedures CG300, the Design Manual for Roads and Bridges, Approval in Principle.

Any culverts and structures outside the above criteria shall be classified as being part of the road infrastructure – existing road crosses numerous small pipe culverts with a diameter less than 0.9m.

#### **CONSULTEE**

##### **Roads, Bridges and Streetlighting (EIA)**

**Date of response – 23 February 2024**

The previous consented scheme included an upgraded 4.5m wide road 9.7km long with passing places, lining, culverts, bridge and cattle grid.

Sect 12.113 in Ch12 of Site Access, Traffic & Transport mentions improvements on the Eishken Rd, it's not clear from this the full extent of the improvement.

A standard cross section could be submitted with relevant text confirming that the extent and length of the road upgrade would be similar to the 9.7km in the previous application.

As the design of the project progresses an application should be made for Road Construction Consent (RCC) allowing adoption of the road by the local authority on completion.

This application will deal with the detail of the road design.

Approval in Principle (AIP) would be sought for the larger structures.

#### **CONSULTEE**

##### **Roads, Bridges & Streetlighting (SEI)**

**Date of response - 23 July 2024**

The SEI Site Access, Traffic and Transport Ch12 note the points raised previously by Roads, Bridges & Streetlighting section at CnES.

This includes the proposed widening of the Eishken road to a 4.5m adoptable standard with a full width of wearing course surfacing across the widened road.

A typical cross-section of this widening has been submitted.

It's likely that the fragile nature of the existing road will not lend itself to widening and in some locations a full re-construction of the road will be required, potentially with offline construction.

Road widening will be permitted only where there is a suitable road sub-grade. Details of this will be dealt with during Road Construction Consent (RCC) and site investigation information may be required.

The condition of the road, bridges and culvert will have to be improved to allow removal of the weight restriction on the road with the road adoption by CnES following the RCC process and completion of the main part of the project.

Concerns have been raised regarding the existing condition of the Eishken bridge following recent movements of construction plant. Planned works involving heavy plant crossing the bridge must be cleared with CnES Structural Engineer and accommodation works carried out. It may be necessary to introduce a further weight restriction before the project commences.

The developer should provide an indication of the time line for the project to assess if further restriction is required.

## **CONSULTEE**

### **Economic Development (SEI)**

No comments.

**Date of response – 23 July 2024**

## **CONSULTEE**

### **Archaeology Service (EIA)**

**Date of response – 06 November 2023**

Thank you for consulting the Archaeology Service. The subjects of Archaeology and Cultural Heritage are considered in Chapter 11 of the Environmental Assessment Report. The report identifies the range of known cultural heritage assets, including designated and undesignated monuments and includes direct and indirect impacts on these features, including setting; that will potentially be affected by the windfarm development. It also considers the potential for unknown archaeological sites and deposits within the study area. The Comhairle Archaeology Service welcomes the inclusion of a dedicated chapter that assesses the impact of the development on the cultural heritage resource.

#### Relevant Policy and Guidance

Scottish Government Planning Policy is set out within the National Planning Framework 4 (2023). Protection and management of the historic environment in relation to development proposals are identified in Policy 7. This is supported by Historic Environment Scotland's, Historic Environment Policy for Scotland and the regional planning guidance concerning cultural heritage, reflected in the Outer Hebrides Local Development Plan (2018). When nationally important archaeological remains, whether scheduled or not, are affected by a proposed development, there should be a presumption in favour of their physical preservation in-situ, and a presumption against proposals which would involve significant alteration or cause damage, or which would have significant effect on the setting of visible remains. Whilst the preservation of in-situ remains is preferred, it may be possible to mitigate impacts to archaeological remains of less than national importance via programs of archaeological excavation and /or watching brief, enabling the preservation by record of archaeological deposits destroyed or damaged by a development.

#### Potential for Unknown Cultural Heritage Assets

Section 11.43 considers the known historic environment asset data in order to inform a predictive model for the potential for unknown archaeological sites and deposits within the development area. Most known sites relate to the post medieval period and relate to settlement remains or associated field systems and boundaries. The focus for these sites is located around the area of Loch Seaforth Head; however, sheiling type features are located within the area of the main site as well. Several sites represent a presence in prehistory and a clapper bridge may indicate activity in the area during the medieval period.

Discussion of the archaeological potential of the site (11.69 – 11-71) regards the potential for prehistoric to medieval deposits to be low and post medieval deposits or features to be moderate. Preservation of palaeo environmental remains is regarded as moderate; the Archaeology Service would suggest that across the site peat depths range for 0.5m to over 3m (TA10.1). Peat is an excellent repository of environmental data and will hold a record of the environment from its formation onwards, preservation of palaeo environmental remains is regarded as high. Discussion of the access track (11.72 – 11.74) states that there are no prehistoric sites within the boundary of the access track, however this omits the Stone Circle and possible cairn at Sideval. It is important to note that the reuse of settlement sites is a recognised factor in the archaeology of the Outer Hebrides, particularly in a coastal context. Subsequent settlement activity masks earlier phases. In the case of Loch Seaforth Head the Archaeology Service would suggest that post medieval features may have reused or incorporated earlier sites or settlements. Therefore, potential for earlier deposits and features should be considered at least moderate.

#### Potential impacts

The main construction works with the potential for direct impacts to the cultural heritage resource include topsoil stripping, access tracks, turbine bases, temporary hardstandings, cable trenches, bunding, heavy plant movement, borrow pits and drainage and hydrological changes. The report has recognised a low potential for impact on known and unknown cultural heritage within the site itself and identifies the access track as the main focus of impact on known sites. Ten sites are identified as having the potential for partial or total

impact through modification of the access track (11.161 – 163), initial mitigation will take the form of an archaeological watching brief.

The main operational impacts on cultural heritage assets are recognised as possible visual impacts on setting. Four monuments of national importance were investigated through the application of ztv and wire frame modelling assessment. The comprised of Sideval Stone Circle (SM5351), St Columb's Church (SM5345), Dun Cromore (SM167) and the Calanais Stones (SM90054). Of these scheduled monuments only the Calanais stones were seen to have a negative effect on their setting; however this impact will not be within the direct line of sight when look towards the hills of Mor-Mhonaid , Guainamol & Sidheanan Airgid and as such the significance of impact is regarded as minor.

#### Mitigation

Mitigation through design is outlined in Chapter 2, Site Description and Design Evolution. Direct impact on known heritage assets is primarily identified along the site access track and will be managed through archaeological monitoring of these areas (11.85). However further mitigation strategies to be agreed with the Local Authority Archaeology Service are acknowledged and will be managed through appropriate Written Scheme(s) of Investigation (11.86).

The development is situated in a remote mountainous area of extensive peatland and is currently accessible via a single track road. The number of recorded archaeological sites in the wider environs of the development are low. However, the very nature of this landscape and the processes which formed it and its settlement patterns are indicative of a potential for unrecorded archaeological and palaeoenvironmental remains to be encountered within the development zone.

Therefore, the Archaeology Service recommends that the following requirements be applied to this application.

#### Condition

No development shall take place until the applicant has secured the implementation of a programme of archaeological works in accordance with a written scheme of investigation (WSI) which has been submitted by the applicant and approved by the planning authority.

The programme of archaeological works shall include measures to be taken to protect and preserve any features of archaeological interest in situ and the recording and recovery of archaeological features which cannot be preserved.

The approved program of archaeological works shall be implemented in full.

As a minimum the program of archaeological works shall make provision for the following:

- I. Full archaeological monitoring of cultural heritage areas subject to direct impact from the development.
- II. Provision for the full excavation of multiperiod archaeological deposits where identified; as agreed with the Local Authority Archaeology Service, stipulated within a specific WSI.
- III. Provision for the paleo environmental sampling of any basins located during the stripping of topsoil/ peat, the range of which should cover and not be limited to, dating, species identification and soil micromorphology.
- IV. The recording of archaeological remains which are not to remain in situ and the disposal of finds via the Scottish Archaeological Finds Allocation Panel as required by law.
- V. Appropriate arrangements for the publication of results of the archaeological work.

Additionally, it is recommended that the applicant shall afford access at all reasonable times to the Local Authority Archaeology Service to observe work in progress and record items of interest and finds.

Further recommendations:

The appointment of a suitably qualified clerk of works (ACOW / ECOW) will greatly assist in the management and reporting of this project.

As previously noted, (Mitigation) the development area is remote; however, there is still potential for identified archaeological features to be negatively impacted by development activities such as vehicle movement. Fencing is not an appropriate mitigation response for this development location due to environmental factors. However, it is recommended that a procedure for demarcation could be achieved through georeferencing data, for all sites of Cultural Heritage within 50 metres of the developments footprint.

Reason:

To ensure proper recording and protection of items of archaeological interest.

**CONSULTEE**

**Archaeology Service (SEI)**

**Date of response – 30 July 2024**

Thank you for consulting the Archaeology Service. Please be advised that the supplementary information in Chapter 11; accompanying the proposed amended site layout has been reviewed. The Archaeology Service is content with its original response and has no additional comments to add.

**CONSULTEE**

**Archaeology Service response to Representation 009**

**Date of response – 10 October 2024**

Thanks for the opportunity to review the comments associated with the Uisenis Wind Farm application. Please be advised that following review, the Archaeology Service has no additional comments.

**CONSULTEE**

**Environmental Health (EIA)**

**Date of response – 15 January 2024**

Noise

I have attached a draft condition for turbine noise for the development, based on the 6 nearest noise receptors and the increased levels allowed for those properties where there is a financial interest, in line with ETSA.

Construction Noise

Taking into account the operational hours for the development, the properties likely to be affected having a financial interest and the EIA finding any residual effect not significant I have no further comment.

Shadow Flicker

The EIA highlights that several properties will likely be affected by shadow flicker (again all have a financial interest in the development), however the applicant is committed to installing shadow flicker control modules on the turbines with the potential to cause shadow flicker on nearby receptors. In line with the EIA mitigation, it is recommended that a condition be included where any complaints are investigated in a timeous manner, to the satisfaction of the planning authority and that the rectification of any substantiated shadow flicker issue would be implemented promptly and effectively.

Dust

There is the potential for dust from the construction of this development to cause a nuisance to neighbouring properties. The following condition is recommended.

Condition

A method statement should be submitted to the Planning Authority outlining what dust mitigation measures will be put in place for the duration of the construction phase. Should any complaints be received in respect of dust, the developer shall fully investigate these complaints to establish dust levels at any affected property.

**CONSULTEE**

**Environmental Health (SEI)**

**Date of response – 23 July 2024**

Based on the updated information, revised turbine locations, I have no comments other than to recommend the noise conditions as attached, or similar, be applied (which may differ to the condition(s) on the original permission). ***(Attached as Appendix 6a)***