APPENDIX 3

CONSULTATION RESPONSES

CONSULTEE
Ministry of Defence **Date of response – 17 May 2024**

Thank you for consulting the Ministry of Defence (MOD) in relation to the planning application for the Monan Wind Farm through your communication dated 30 April 2024.

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 am writing to tell you that, subject to the conditions detailed in Appendix A, the MOD has no objection to the proposed development.

The application concerns a development of 3 turbines with maximum blade tip heights of 86 metres above ground level. The development has been assessed using the location data (Grid References) below as provided in the EIA Report, Chapter 2: Proposed Development and Design Evolution dated March 2024.

Turbine no	Easting	Northing
1	114009	904729
2	114155	904937
3	114360	905067

The principal safeguarding concern of the MOD with respect to this development of wind turbines relates to the potential to create a physical obstruction to air traffic movements.

Physical Obstruction
In this case the development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

To address this impact, and given the location and scale of the development, the MOD require conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. Suggested condition wordings are set out in Appendix A.

As a minimum the MOD would request the wind turbines are lit with Infra-red (IR) beacons.

Summary
Subject to the two conditions requested above and provided in Appendix A, the MOD has no objections to the development.

The MOD must emphasise that the advice provided within this letter is in response to the information detailed in the developer's 'the EIA Report, Chapter 2: Proposed Development and Design Evolution' dated March 2024. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding

Appendix A
Condition - Aviation Lighting
Prior to commencing construction of any wind turbine generators, or deploying any construction equipment or temporal structure(s) 50 metres or more in height (above ground level) the undertaker must submit an aviation lighting scheme for the approval of the Comhairle nan Eilean Siar Council in conjunction with the Ministry of Defence defining how the development will be lit throughout its life to maintain civil and military aviation safety requirements as determined necessary for aviation safety by the Ministry of Defence.

This should set out:

a) details of any construction equipment and temporal structures with a total height of 50 metres or greater (above ground level) that will be deployed during the construction of wind turbine generators and details of any aviation warning lighting that they will be fitted with; and

b) the locations and heights of all wind turbine generators and any anemometry mast featured in the development identifying those that will be fitted with aviation warning lighting identifying the position of the lights on the wind turbine generators; the type(s) of lights that will be fitted and the performance specification(s) of the lighting type(s) to be used.

Thereafter, the undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. The lighting installed will remain operational for the lifetime of the development.

Reason for condition.
To maintain aviation safety.

Condition - Aviation Charting and Safety Management
The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:

a) the date of the commencement of the erection of wind turbine generators;
b) the maximum height of any construction equipment to be used in the erection of the wind turbines;
c) the date any wind turbine generators are brought into use;
d) the latitude and longitude and maximum heights of each wind turbine generator, and any anemometer mast(s).

The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development.

Reason for condition.
To maintain aviation safety.

CONSULTEE
Comhairle Archaeology **Date of response – 21 May 2024**
This application proposes to replace three existing wind turbines of 46m with three proposed turbines of 86m height. The site is located in an elevated position adjacent to a small narrow valley; the overall environment of the area comprises of thin peat cover over glacial till and numerous rock outcrops. In terms

of the elements, it is an exposed site. The overall landscape is part of the Harris hills that rise from the coast, the site in general terms is enclosed on three sides by large steep sided rocky hillsides.

Pre application discussions determined that archaeological mitigation for the existing site had been carried out previously and that the any new works required, would be unlikely to encounter any unknown archaeological deposits. The potential for indirect impact on known archaeological sites was considered to be low / negligible. For these reasons Cultural Heritage & Archaeology were screened out of the EIA report.

The ZTV study identifies that the visual impact will be contained within a relatively narrow corridor that arcs from the West through to the Southwest. All three proposed turbines will be visible from some important sites on Taransay and Toe Head; however, the distances involved are at 12km and beyond. Given the distances involved and the fact that the proposed turbines when viewed towards the East through to the Northeast will be screened by the larger hills behind them, it is considered that negative visual impact on the archaeological or historic resource is negligible.

Please be advised that this Archaeology Service does not recommend any archaeological mitigation regarding this application.

CONSULTEE

Comhairle Environmental Health **Date of response – 15 May 2024**

Noise and shadow flicker were scoped out of the EIA assessment. Given the distances I don't expect any issues but would recommend including the standard conditions re noise, shadow flicker and construction.

Noise

Condition 1 **At wind speeds not exceeding 10m/s, the wind turbine noise level at the façade of any dwelling or other noise sensitive premises shall not exceed during Day-time hours (0700 - 2300), 35dB LA90, 10min or the Day-time Hours LA90, 10min Background Noise Level plus 5bB(A), whichever is the greater; and during night hours (between 23:00 - 07:00), 38dB LA90, 10min, or the Night Hours LA90, 10min Background Noise Level plus 5dB(A), whichever is the greater.**

In this condition:

- ***"wind turbine noise level" means the rated noise level due to the combined effect of all the wind turbines, excluding existing background noise level but including any tonal penalty incurred under the methodology described in ETSU-R-97, pages 99-109.***
- ***"Background Noise Level" means the ambient noise level already present within the environment (in the absence of noise generated by the development) as measured and correlated with Wind Speeds.***
- ***"wind speeds" means wind speeds measured or calculated at a height of 10 metres above ground level on the wind farm site at the wind monitoring mast nearest to the premises of interest.***
- ***"Noise Sensitive Premises" means premises, the occupants of which could be exposed to noise from the wind farm and includes hospitals, residential homes, nursing homes, etc.***
- ***"dwelling or other noise sensitive premises" means any dwelling or other noise sensitive premises which is lawfully existing or has planning permission at the date of this consent.***

Reason *To set maximum noise limits specific to the development in order to protect the amenity at noise sensitive premises.*

Condition 2 **If a complaint relating to noise emissions from the wind turbine is made to the Comhairle as Planning Authority and the Comhairle considers that it merits investigation, the operator of the turbine will on written notice by the Comhairle be required to measure, at their own expense, the level of noise emissions from the wind turbine. Noise monitoring shall be carried out by a suitably qualified noise expert or consultant previously agreed in writing by the Comhairle and shall be carried out in accordance with the method statement stated in section 2.0 'Procedure to be followed in the event of a complaint' page 102 of the publication 'The Assessment and Rating of Noise from Wind Farms' (ETSU-R-97, Department of Trade and Industry, September 1996). A protocol prepared by the appointed noise expert including a timetable for the collection, analysis and reporting of the noise data gathered shall be submitted to the Comhairle for approval within two months of the Comhairle having given notice of monitoring being required. The assessment report shall then be submitted to the Comhairle in accordance with the approved timetable.**

Reason *To quantify the loss of amenity at noise sensitive premises resulting from the operation of the windfarm.*

Condition 3 **Should the noise monitoring undertaken in accordance with condition 2 demonstrate that the noise thresholds set by condition 1 or 2 are being exceeded, the operator shall submit a scheme of mitigating measures to the Planning Authority for written agreement within three months of the breach being identified, or within any alternative timescale agreed in writing by the Planning Authority. The agreed mitigating measures shall be implemented within three months of the written agreement or within any alternative timescale agreed in writing by the Planning Authority and thereafter retained throughout the life of the development unless otherwise agreed in writing by the Planning Authority.**

Reason *To ensure adequate mitigation is in place to protect amenity at noise sensitive premises.*

Shadow Flicker

Condition 4 **At the request from the occupier of the affected property, the operator of any turbine producing shadow flicker at any dwelling *or other occupied premises which is lawfully existing or has planning permission at the date of this consent* shall be shut down and the blades remain stationary until the conditions causing those shadow flicker effects have passed.**

Reason *To ensure adequate mitigation is in place to protect amenity at sensitive premises.*

Construction

Construction Noise -would recommend the following standard construction noise conditions:

Condition 1a **The developer should ensure that any construction works are carried out in accordance with BS 5228:2009.**

Reason *To protect the amenity at noise sensitive premises.*

Condition 2 **Should any complaints be received in respect of [construction] noise levels, the developer shall fully investigate these complaints and if requested by the Planning Authority to establish noise levels at any affected property, shall undertake noise monitoring which shall be carried out by a suitably qualified noise expert or consultant previously agreed in writing by the Planning Authority. The methodology of the assessment shall be carried out in accordance with BS7445:2003, BS 4142:2014+A1:2019 and PAN 1:2011.**

Reason *To quantify the loss of amenity at noise sensitive premises resulting from the operation of the development.*

Condition 3 **Should any noise monitoring undertaken in accordance with condition 2 above demonstrate that construction sound sources are exceeding the background levels by more than 10dB, the developer shall submit a scheme of mitigating measures to the Planning**

Authority for written agreement within one month of the breach being identified. The agreed mitigating measures shall be implemented within one month of the written agreement or within any alternative timescale agreed in writing by the Planning Authority and thereafter retained throughout the life of the development unless otherwise agreed in writing by the Planning Authority.

Reason *To ensure adequate mitigation is in place to protect amenity at noise sensitive premises.*

CONSULTEE

Historic Environment Scotland **Date of response – 22 May 2024**

Thank you for your consultation which we received on 24 April 2024. We have considered it and its accompanying EIA Report in our role as a consultee under the terms of the above regulations and for our historic environment remit. Our remit is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories.

You should also seek advice from your archaeology and conservation advisors for matters including unscheduled archaeology and category B and C-listed buildings.

Our Advice

We have reviewed the information received and do not consider that the proposal would have any significant impacts on heritage assets within our remit. We therefore do not wish object to the proposal. Our detailed comments are in the Annex to this letter.

Our comments should be treated as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object. Our decision not to object should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

Further Information This response applies to the application currently proposed. An amended scheme may require another consultation with us.

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series. Technical advice is available through our Technical Conservation website at www.engineshed.org.

ANNEX

Our Detailed Comments

Background

We understand that consent was granted in 2008 on the Monan Wind Farm site for three wind turbines at a maximum tip height of 86m and associated infrastructure (06/00290). We had no objection when we were consulted on that application in December 2006 (your ref: MMK/AMMK). Although we noted that all three turbines would likely be visible as part of the wider landscape backdrop to Bunavoneadar, whaling station, Harris (SM5362) on the approach from Tarbert, we considered that it seemed unlikely for any impact to be significant. We understand that the consent was then varied in 2012 to reduce the height of the turbines to the height of the operational scheme due to turbine supply issues for the site at that time.

Proposed Development

We understand that the proposed development comprises the removal and replacement of the three existing 2-bladed wind turbines of 46m to tip height at the Monan Wind Farm with three 3-bladed wind turbines with tip height of up to 86m and associated infrastructure. We note that the applicant has indicated that the new turbines would be located at close proximity to the current turbine positions and would use the majority of the existing access tracks. Electrical power generated would be fed to the existing substation on the Monan Wind Farm site via underground cables. We have not been consulted on this proposed development at the scoping stage, although we note that the developer appears to have sought a scoping opinion from you.

Environmental Impact Assessment Report
We note that our historic environment interests were scoped out at the scoping stage.

However, we can confirm that there are no scheduled monuments, category A-listed buildings, inventory battlefields, gardens and designed landscapes or world heritage sites within the boundaries of the proposed development. There is a scheduled monument of Bunavoneadar, whaling station, Harris (SM5362) c. 1km from the proposed development. Our detailed comments regarding the scheduled monument are as follows.

Scheduled Monument
We understand that the proposed turbines are to be sited c. 1km northeast of Bunavoneadar, whaling station, Harris (SM5362), which is a well-preserved early 20th century whaling station, but the proposed turbines should be screened from the monument by the intervening topography.

This monument comprises the remains of a well-preserved whaling station built around 1900 and abandoned around 1939. The monument consists of a large slipway, landing platform, and handling areas, along with the remains of several substantial processing buildings. A brick chimney stack, one of two originally built, survives almost intact as do anchor blocks for vats, boilers, winches, and other heavy equipment. The monument is of national importance as the best-preserved example of a whaling shore station in the country. It represents one of a very small group of such stations founded around Scottish Coasts by joint British / Norwegian companies in the late 19th and early 20th centuries.

The significance of the asset is vested not only in its physical remains but also in its setting, standing as a visual reminder of the complex and dynamic industrial heritage of the Hebrides through the post-medieval period into the present. The views of the whaling station on approach from the sea up Loch Bun Abahainn Eadarra and from points around the coast are key to understanding, experiencing and appreciating the site and its function as part of the maritime economy of the Western Isles and the North Atlantic more widely. The dominance of the brick chimney over the surrounding bay is also key to understanding the industrial nature of the area in early 20th century.

The proposed turbines would be sited in an elevated position c. 1km to the northeast of the monument. Though the turbines may be visible in some long-distance views of the site from the sea, they are at a sufficient distance that they will not impact on the visual relationship of the station with the surrounding coastline. The turbines are not likely to be visible from the site itself and therefore will not detract from the dominance of the industrial chimney over its immediate surroundings in the bay.

Our position Although the turbines may be visible in key views of the monument on approaches from the sea, we do not assess these impacts as significant. This assessment is consistent with our view on the previous consultation on the Monan Wind Farm site in 2006 for three wind turbines at a maximum tip height of 86m and associated infrastructure.

CONSULTEE
HIAL - Safeguarding **Date of response – 08 May 2024**
With reference to the above proposal, our preliminary assessment shows that, at the given position and height, this development would not infringe the safeguarding criteria and operation of Stornoway Airport. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.

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.

CONSULTEE

SSEN **Date of response – 30 April 2024**

With reference the above application SSEN Distribution would register no objections to the proposed works. However as noted in the consultation list SSEN Transmission will also need to be consulted as well to advise on their apparatus.

There is existing distribution overhead apparatus in proximity to the site which has been indicated on the site plan that they will be accessing the site beneath the 33,000V overhead line. With an overall turbine height of 86m SSEN Distribution would require a tipping distance of 1.5 times the height, which would be 129m which the applicant has from the existing distribution apparatus.

As such the applicant will need to adhere to the HSE guidance note GS6 which relates to work in proximity to overhead lines and to GS47 which relates to work in proximity to underground cables.

I would ask that the applicant or their appointed contractor contact the local depot on either 01851 706922 or email western.isles.depot@sse.com to arrange an on site meeting in advance of works commencing on site to confirm the required safety precautions applicable during the construction phase of the project.

CONSULTEE

SSEN Transmission **Date of response – 22 May 2024**

Background

Scottish Hydro Electric Transmission plc who, operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), own, operate and develop the high voltage electricity transmission network of 132kV and above in the north of Scotland. The network includes overhead and undergrounded electricity transmission lines as well as associated substations, all of which are critical national infrastructure required to enable greater home-grown energy security and deliver a network for Net Zero in Scotland. SSEN Transmission's infrastructure is classified as 'National Development' within National Planning Framework 4 (NPF4), therefore its need and importance is supported and clearly defined at a national level by the Scottish Government.

Policy position

NPF4 was formally adopted in February 2023 and is the long-term spatial planning policy framework for Scotland which puts tackling the global climate emergency and the delivery of Net Zero at the forefront of the Scottish Government's ambitions. NPF4 now forms part of the 'statutory development plan' alongside local development plans (LDPs), and as such directly influences planning decisions. Policy 1 (Global Climate and Nature Crisis) in NPF4 intends to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change. The existing and future transmission network is critical to enabling the development of low carbon electricity generation. Policies 11 (Energy) and 18 (Infrastructure First), directly support new transmission infrastructure and recognise the significance of Scotland's transmission network as a platform for delivering Net Zero. These policies demonstrate that the protection of existing transmission assets from new development is of critical importance and should be a strong material consideration in the determination of planning applications which have potential to impact on the existing and future operation of our infrastructure.

We prioritise the safe and reliable transmission of high voltage electricity over long distances to communities, and both the Planning Act (Scotland) 2019 and NPF4 provide for planning decisions to be made in the long-term public interest. Subsequently, SSEN Transmission welcomes Comhairle nan Eilean Siar giving due consideration to its comments in reaching a decision over planning applications.

Comments

Thank you for consulting us on this application. Our high-voltage 132kV (132,000 volt) Harris to Stornoway overhead line (OHL) runs past the site to the south-east, which is critical national infrastructure. Given the

significance of our asset to providing the supply of electricity to those living and working on the Isle of Harris and Isle of Lewis, we have the following comments to make:

Impact on existing overhead line
The proposed nearest replacement wind turbine would be sited c. 370m away from our existing overhead line. Subsequently, this would be sufficient separation from our existing overhead 132kV overhead line to mitigate any adverse operational impacts on our critical national infrastructure, allowing us to maintain a safe and reliable supply of electricity to all those that require across the Outer Hebrides.

Impact on proposed replacement overhead line
We obtained Section 37 (under the Electricity Act 1989) consent (ref: ECU00004490) for a replacement 132kV overhead line (OHL) from Scottish Ministers in February this year and work on implementing this consent is intended to commence before the end of 2024. Given our replacement line would most likely be located further away from the proposed wind turbines than our existing OHL, there would be sufficient separation to between the two developments to mitigate any adverse 'wake' effects on our future infrastructure, ensuring we can maintain and safe and reliable supply of electricity to local communities.

Delivery of wind turbines to site
Should the Council be minded to approve this application, transportation of the wind turbines to site would appear likely to take place underneath our overhead transmission line. To ensure that no conflict with our line takes place, we recommend the developer contact our Asset Management team at Transmission.Asset.Management@sse.com at least 30 days prior to delivery to ensure that appropriate safety measures will be put in place to manage this risk. Subsequently, if this application is approved, we ask that this recommendation is added as an informative to the decision notice.

Conclusion
To conclude, SSEN Transmission have no concerns with the proximity of the proposed replacement larger wind turbines relative to the location of our existing and proposed critical national infrastructure from an operational perspective. Should this application be approved, however, we ask the Council to attach our recommended informative on the planning consent to ensure that delivery of the proposed wind turbines would not present any conflict with our overhead transmission line. We trust this letter is helpful and should you have any queries about the contents of this letter, please do not hesitate to contact me directly.

CONSULTEE
NATS **Date of response – 30 April 2024**
The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

CONSULTEE

NatureScot **Date of response – 26 September 2024**

In our original response to this planning application, we highlighted some shortcomings with the off-setting and enhancement proposals which we considered may limit their effectiveness and likelihood of delivering the results intended.

The proposals in the attached outline Plan, in particular the plan to work with the North Harris Trust to deliver a woodland planting programme, are welcome. Our concern is that this is secured by a legally binding mechanism to deliver the biodiversity results intended.

We are likewise content with the proposals to enhance track edges and bog pool habitat, and provide an updated education pack for the site.

NatureScot **Date of response – 10 May 2024**

The Proposal

The application proposes the construction of 3 wind turbines, of 86m to blade tip, and associated infrastructure within the outlined site in north Harris. This is on the site of the current Monan wind farm.

Landscape and Visual Impacts

The proposal is situated within the South Lewis, Harris and North Uist National Scenic Area (NSA). The current development which this proposal would replace, comprises part of the assessment baseline.

Potential impacts on the NSA are assessed in relation to the special qualities of the NSA. In this case, we largely in concur with the following conclusions presented in the Landscape and Visual Impact Assessment (LVIA) that has been prepared by the applicant:

There are many diverse seascapes across the NSA, and this proposal would only affect a very small proportion of these.

The somewhat enclosed nature of the development site from most directions, very much limits any impacts on intervisibility.

The wild, mountainous character is best experienced from the north of the NSA viewing south, where the mountains create a stark contrast with the flatter moorland, and form a backdrop and dramatic skyline. Given the turbines are south of this, they would have limited impact on this aspect of the mountainous character.

Overall therefore, considering the impacts of the proposal over and above those of the current wind farm on site, we do not consider that the special qualities of the NSA at this location would be adversely affected so as to affect the overall integrity of the NSA.

The proposed development, like the current one, overlaps the southern edge of the Harris-Uig Hills Wild Land Area (WLA). Views from the south towards the WLA would include other human artefacts as well as the wind farm, as they include the current wind farm, and would not extend to the interior of the WLA. Similarly, views from the north would be almost entirely of areas outwith the WLA, including developed areas.

In conclusion: The Proposed Development will replace three existing 2-bladed wind turbines of 46m to tip at Monan Wind Farm, with three 3-bladed wind turbines with a tip height of up to 86m. The impacts are therefore upon a part of the landscape, that is already affected by this type of development, albeit with a larger scheme. The Proposed Development thus would have a slightly greater impact than the existing development. However, any impacts would not be sufficient to significantly alter the existing landscape. This is due to two of the turbines located on the same bases as the existing turbines, minimising direct physical effects, and the degree of containment provided by the topography restricts the influence even the larger turbines will have. While there is slightly greater impact on the setting and scale of landscape features such as the Clisham, this would not be sufficient to diminish the scale of these mountains, whose scale and

dramatic presence remain intact. Visually the turbines would be more prominent, although significant visual effects are only predicted from two of the four viewpoint locations. In these cases, the increased height never causes them to appear dominant, or overbearing on the visual receptors below such as the A859 or the settlement of Ardhasaig. The high sensitivity of the area due to the NSA means that even a medium magnitude of change results in significant effects, thus all four viewpoint locations have significant effects predicted in landscape terms. These represent singular static locations and would also represent the worst affected locations, and despite these localised effects, they would not be sufficient to cause significant effects on the NSA as a whole. The changeable topography allows for common screening of the development, and ridgelines often screen the lower sections of the turbines, thus reducing their vertical prominence. While the included viewpoints receive some significant effects, these views were selected as they represent the areas most affected by the Proposed Development and not necessarily the most scenic views, or commonly experienced views. While the Proposed Development is within both an NSA and a WLA, its presence is not sufficient to significantly alter the quality, character or setting of these landscapes, particularly the WLA, as it is situated on its very southern edge. Many of the special landscape qualities of the NSA are completely unaffected due to the limited visual influence the turbines have. None of the qualities that are affected, are affected to significant levels. The four viewpoints provided are all within the NSA and, while significant effects would occur on these specific locations, this impact would not occur throughout the NSA and is highly localised. Overall, while the proposed increased scale of the turbines causes slightly greater effects, none of these would be sufficient to cause additional new impacts (bar a short section of the A859 at Loch a Mhorghain) and would not result in significant impacts on the NSA or WLA.

Ornithology

Golden eagle: the closest territory to the development site has 3 alternative nest sites. One is 600m to the west, with no line of sight from the nest. The other two are some 3km to the north-west. The last confirmed use of the closest nest site was in 2019, but survey work by the local raptor study group has been incomplete since then. One of the 3km eyries is being used in 2024.

Almost no golden eagle flights were recorded within the search area during the survey period. This is consistent with the nearest eyrie not being used over the survey period, and the relative unimportance of the development site for foraging. The frequent use of the 600m eyrie in preceding years, suggests that there has been no significant displacement as a consequence of the presence of the existing wind farm.

There were not enough recorded flights to run the collision risk model for golden eagles.

This golden eagle range overlaps the North Harris Mountains Special Protection Area (SPA). The EIA has not adequately assessed the impacts on the SPA. However, there is enough information for us to reach a conclusion.

NatureScot's advice is that there is likely to be a significant effect on the SPA. Therefore, an appropriate assessment is required.

Having made our own appraisal of the impacts on the site, based on its conservation objectives, we conclude that is that there is not likely to be an adverse effect on the integrity of the SPA.

White-tailed eagle: there are no nest sites within 5km of the development site. Immature and sub-adult birds were observed at the development site.

Tables 9.8 and 9.9 present the cumulative collision risk morality (CRM) figures for golden and white-tailed eagle respectively, in the Outer Hebrides. However both are inaccurate, as they omit the figures for Uisenis wind farm. This is not important for golden eagle since no flights for the model were recorded. The cumulative figure for white-tailed eagle should be 3-4 per annum, not 1.92 as per para 9.11.5. The CRM figure for white-tailed eagle at Monan is 0.04 per annum. This therefore makes a very small contribution to the total cumulative figure, and is not of concern.

Ecology
Note that, contra the EIA, neither common lizard nor water vole occur in the Outer Hebrides. Frogs do, but are non-native. These can therefore be discounted from further consideration. Mitigation measures for bats need not be considered further, as the habitat on site is not suitable for them.

Total habitat loss as a result of the development footprint is predicted to be 0.52Ha.

The EIA proposes, as biodiversity enhancement, to reduce bare peat along tracks and ditches, planting of scrub, riparian planting, and additional measures such as refugia/hibernacula, and bird boxes.

We think that further consideration should be given to enhancement. The site may not be suitable for scrub due to the prevailing soil and exposure conditions. As there are no water voles, reptiles or native amphibians present, the refugia/hibernacula may deliver little real benefit. Similarly, the site is unlikely to ever host bird species which would benefit from the provision of bird boxes.

CONSULTEE
Roads **Date of response – 04 July 2024**
As stated in the Traffic and Transport section of the EIA Report an Abnormal Load Routing Plan and Construction Traffic Management Plan should be agreed with CnES priors to the works commencing.

Any bridges or structures crossed as part of the Abnormal Load Route should be assessed beforehand with any enquiries directed to the CnES Bridges/ Structural Engineer.

Mitigation works may be required along this route to allow delivery of units.

The developer will be responsible for the repair of damages to the road network as a result of the project. It would be in the in the interest of the developer to film the proposed routes prior to works commencing and carry out condition surveys as stated in the EIA Report.

CONSULTEE
SEPA **Date of response – 08 May 2024**
We are content that the development is of a scale where you can simply refer to our standing advice and we have no site specific advice to provide in this case.

Should you wish to discuss the proposal further we can do so at the next triage meeting.

CONSULTEE
Scottish Water **Date of response – 30 April 2024**
Audit of Proposal
Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced. 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.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

CONSULTEE
Joint Radio Company (JRC) **Date of response – 11 November 2024**
This proposal is **cleared - subject to 50m Micrositing -** with respect to radio link infrastructure operated by the local energy networks.

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.

If any details of this proposal change, particularly the disposition or scale of any turbine(s), this clearance will be void and re-evaluation of the proposal will be necessary.

CONSULTEE
Arqiva **Date of response – 15 November 2024**
Response by Arqiva : No Objection
We refer to the above planning application and thank you for the opportunity to comment on the above development.

Arqiva is responsible for providing the transmission network for the BBC & ITV along with the majority of the UK's radio companies and is responsible for ensuring the integrity of Re-Broadcast Links. Tall infrastructure such as wind turbines and other tall structures have the potential to block radio transmission links and rebroadcasting links (through direct blocking of radio signal or deflecting signal). Our radio transmission networks normally operate with a 100m buffer either side of a radio link, free from interference by a tall development.

We have considered whether this development is likely to have an adverse effect on our operations and have concluded that we have no objection.

CONSULTEE
Outer Hebrides Fisheries Trust **Date of response –**
No response.

CONSULTEE
Western Isles District Salmon Fisheries Board **Date of response –**
No response.