

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request

Date	Consultee	Response
22/05/2024	NATS	<p>NATS are pleased to note the statement that aviation is to be scoped in to the upcoming consultation process. Sandwick is an important radio and surveillance site for managing en-route air-traffic off the ocean and throughout the west coast. We have concerns regarding its integrity once we start seeing 300m+ turbines siting only a few hundred metres to the south. We look forward to working with the developer to be better understand and manage these concerns as more detail becomes available.</p>
23/05/2024	MET Office	<p>Thank you for requesting feedback from the Met Office on the above proposal, which is approximately 12.1 km from our weather radar at Drium-A-Starraig (located at NGR: 154460 932393).</p> <p>A key requirement for the weather radar is to provide advance warning of severe weather and real-time information which is vital to the continued operation of military and civilian aviation as well as to forecasters as part of the UK Weather Radar Network, including input to flood forecasting. As such the Met Office is a Category 2 Responder. Wind turbines have been shown to have detrimental effects on the performance of Met Office weather radars and the accuracy of the products and services derived from the data. These effects include the creation of false 'clutter' returns and such effects can imitate or obscure real precipitation signals.</p> <p>I have reviewed the Scoping Report and have concerns about the proposed pre-commissioning of offshore wind turbines. There is potential that turbines would be in the beam of the radar at Drium-A-Starraig and may create false clutter returns.</p> <p>Therefore, the Met Office confirms that we expect to be included in a suitable assessment to fully consider the potential effects from the proposed development on the Met Office weather radar at Drium-A-Starraig. We expect the assessment to outline the frequency and duration of pre-commissioning of offshore wind turbines, including the anticipated rate of rotation of the turbine blades.</p>
24/05/2024	Scottish Water	<p><u>Audit of Proposal</u></p> <p>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:</p> <p><u>Drinking Water Protected Areas</u></p> <p>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.</p>

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request

		<p><u>Surface Water</u></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>General notes:</p> <ul style="list-style-type: none">▶ Scottish Water asset plans can be obtained from our appointed asset plan providers:<ul style="list-style-type: none">▶ Site Investigation Services (UK) Ltd☎ Tel: 0333 123 1223▶ Email: sw@sisplan.co.uk▶ www.sisplan.co.uk <p>I trust the above is acceptable however if you require any further information regarding this matter please contact me on 0800 389 0379 or via the e-mail address below or at planningconsultations@scottishwater.co.uk.</p>
28/05/2024	SGN	<p>I have reviewed the EIA Scoping Report and wish to provide the following comments.</p> <p>SGN's Stornoway LPG plant provides a gas supply to approximately 1700 homes and businesses. The LPG supply at the plant requires regular replenishment via road tanker to maintain security of supply. It is critical that freight disruptions do not impact on SGN deliveries to site and the proposed project will need to consider security of gas supply and prioritise freight/tanker deliveries with minimal disruption before, during and after construction.</p>

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request

		Prior to full planning permission being sought, a meeting between SGN Asset Management and the developer must take place to discuss the possibilities of supply disruption in greater detail and to identify/agree on suitable mitigating actions if deemed required.
31/05/2024	Municipal Services	I do not envisage any issues in relation to the Comhairle's waste management facilities or services from the proposed development.
31/05/2024	Floodrisk	With regard to Coastal processes, Climate Change, Flooding I have no comment to make on the content of the Scoping Report.
31/05/2024	RSPB	Thank you for consulting RSPB Scotland. Unfortunately, we are unable to provide a response due to a heavy workload at this time and so we are having to prioritise accordingly. I hope this does not cause any inconvenience.
31/05/2024	SEPA	<p>Thank you for consulting SEPA for an Environmental Impact Assessment (EIA) screening and scoping opinion in relation to the above development.</p> <p>Our position and advice, given below, is based on the determining authority ultimately determining that the proposal is classed as development that could be supported for the purposes of assessment under Policies 5 and 22, as defined in National Planning Framework 4. If this is not the case, please advise so we can re-consider our position and advice. We would welcome engagement with the applicant to discuss any of the issues raised in this letter. Whether or not the Environmental Impact Assessment (EIA) is required is a matter for Comhairle nan Eilean Siar to decide in their capacity as the determining authority for the land based elements of the project.</p> <p><u>Advice for the determining authority</u></p> <p>To avoid delay and potential objection the EIA submission must contain a scaled plan of sensitivities, for example peat, 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, and then reduce then mitigate significant impacts on the environment.</p> <p><u>Marine related elements</u></p> <p>Any works which are purely within the marine environment, including at any stage of EIA, fall below the threshold on which we wish to be consulted. Please refer to SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations which is available here.</p> <p><u>Land based elements</u></p>

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request

		<p>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.</p> <p>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. Peat and peatland</p> <p>We note that Onshore Ground Investigation followed by two rounds of peat investigations have been undertaken and a large proportion of the site is on peat. As there are deep peat pockets present on site (between 1m and 1.5m), we will expect the application to be supported by a comprehensive site specific Peat Management Plan. Please refer to the attached Appendix 1, paragraph 4.6 for more details regarding all requirements.</p> <p>As it appears that much of the site is likely to be peatland, we suggest a National Vegetation Classification (NVC) survey is undertaken without carrying out Phase 1. For further information on assessments please refer to SEPA Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems, in particular sections 2.10 to 2.14. NatureScot also provides useful information on NVC survey method and mapping requirements.</p> <p>Pollution prevention and environmental management</p> <p>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.</p> <p>We support use of local materials where available and implementation of waste hierarchy during construction works. We hope this will be included in the final EIA document.</p> <p>Other planning matters</p> <p>For all other planning matters, please see our triage framework and standing advice which are available on our website: www.sepa.org.uk/environment/land/planning/.</p> <p><u>Regulatory advice for the applicant</u></p>
--	--	--

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request

		<p>Details of regulatory requirements and good practice advice, for example in relation to private drainage, 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 in the email subject.</p>
31/05/2024	Economic Development	<p>Having looked at the scoping report, the areas of economic development are covered in the report as one would expect and appear to be well presented. No concerns on the scoping report as presented.</p>
04/04/2024	Roads	<p>Parking for the development should be based on the standards set out in the Outer Hebrides Local Development Plan. The Scoping Report states the projected transport figures suggest that both the junctions and the routes on the existing network will operate within their capacity. The document also recognises that certain roads will be affected by a marked increase in the volume and frequency of HGV's on both the construction and operational phase of the development.</p> <p>An updated TA will be scoped in to the EIAR which will be used to develop a Construction Traffic Management Plan. This should be submitted before works commence on the development. There may be restrictions on HGV movements around schools at specific times.</p> <p>The Report also states that the Operational Phase of the development will be scoped out of the report on the basis of the Potential Operational Impacts 24.4</p> <p>The proposed improvement to the Arnish Road will lessen the effect of the operational impact.</p>
06/06/2024	Archaeology	<p>The Archaeology Service notes the inclusion of Section 19: Archaeology and Cultural Heritage within the EIA Scoping document. Appropriate legislation and guidelines have been acknowledged and this section discusses both terrestrial and marine historic environment assets and considers the potential impact / effects on these features, during the construction and post construction phases of the development. Additionally, the potential for unknown archaeological remains and palaeo-environmental deposits are also considered.</p> <p>The document makes reference to the findings of both the terrestrial and marine archaeological program of works carried out for the Deep Water Port (DWP) project; however, it should be noted that the CnES Archaeology Service has not received copies of either the marine archaeological survey or the terrestrial watching brief reports. Due to this lack of information the Archaeology Service is unable to comment in detail.</p> <p>It is recommended that copies of these reports are sent to the Archaeology Service prior to submission of the EIAR.</p>

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request

		<p>This section also identifies potential operational impacts from aspects of the development on the setting of historic assets and assessment it proposed. It is recommended that visual impact assessment is expanded beyond the proposed 5km buffer to enabled appropriate assessment regarding the floating wind turbine impacts. This could be approached using an inner study area and then increasing 5km buffers.</p> <p>The document proposes appropriate mitigation covering pre-construction and construction phases of the development, including review of previous geophysical survey data carried out for DWP, watching briefs and Protocol for Archaeological Discoveries. This data will further inform the marine planning consent aspect of this development as set out in Scotland's National Marine Plan 2015.</p> <p>With regard to 3.3.1 Construction Methods, it is noted that rock blasting, vibration and impact drilling are some of the construction techniques likely to be implemented. The Archaeology Service would take this opportunity to highlight potential negative impact to the island dun in Loch Arnish, through shock waves or vibration. Recent studies have identified this site as a stone and possibly timber constructed crannog. Loch Arnish Dun (MWE4316) is also a scheduled monument (SM 5397). It is recommended that early discussion is entered into with Historic Environment Scotland to discuss this potential issue.</p>
10/06/2024	HIAL	<p>HIAL have assessed the proposed development and would require the developer to apply for a crane permit. This can be accessed online at our website: Safeguarding at our airports – Cranes - Highlands and Islands Airports Limited (hial.co.uk)</p> <p>We have no objections to the other proposed development areas.</p>
14/06/2024	Historic Environment Scotland	<p>Thank you for your consultation which we received on 17 May 2024 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).</p> <p>Your archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.</p> <p>Proposed Development</p> <p>We understand that the proposed development comprises the second phase of Transport Scotland's Deep Water Port Project, known as Deep Water South. The proposals include a new quay which requires land reclamation and dredging.</p>

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request

		<p>The most visible elements of the scheme are likely to be temporary infrastructure associated with the servicing and pre-commissioning of floating turbines measuring up to a maximum height of 330m above sea level, plus a jib crane positioned on the quayside to a height of 216m. Whilst the Zone of Theoretical Visibility (ZTV) for the permanent quay shows a visibility that is largely confined to the existing Stornoway Harbour and environs, the ZTV for the temporary crane and temporary floating turbine shows visibility across the majority of the Isle of Lewis and across to the Scottish Mainland.</p> <p>We provided comments in relation to the marine licence for the proposals to the Marine Directorate in June 2024 (SCOP-0046).</p> <p>Our Advice</p> <p>There are several onshore designated heritage assets within the vicinity of the development site, such as Lews Castle (LB18677), its associated GDL (GDL00263) and a number of scheduled monuments, such as Arnish Point, gun emplacements (SM5347), Loch Arnish, dun (SM5397), Cnoc na Croich, chambered cairn (SM6550), Druim Dubh, stone circle (SM5504) & Rubha Shilldinish, promontory fort and homestead (SM5253).</p> <p>The impact on the setting of these assets would derive from the storage of offshore turbines at the site rather than from the physical components of the quay itself. However, there is not yet sufficient clarity regarding the visual impacts of this temporary infrastructure, and there may be scope within the proposed options to mitigate setting impacts on our interests.</p> <p>We would expect these issues to be explored further as the scheme is developed, with the use of photomontages where adverse impacts are predicted. We would welcome further engagement with the applicant regarding setting impacts on onshore assets as the proposals progress. Further information regarding the setting assessment is provided in the annex below.</p> <p>The EIA assessment for the proposals should be undertaken by a suitably experienced heritage professional with an understanding of marine issues. The assessment should meet the requirements of National Planning Framework 4 (2023), the Historic Environment Policy for Scotland (HEPS, 2019) and associated Managing Change Guidance Notes. Additional guidance can also be found in the Cultural Heritage Appendix to the EIA Handbook (SNH, HES, 2018).</p>
--	--	--

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request

		<p>Further information</p> <p>Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at https://www.engineshed.scot/.</p> <p>We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Sam Fox and they can be contacted by phone on 0131 668 6890 or by email on samuel.fox@hes.scot.</p>
--	--	--