



**COMHAIRLE NAN EILEAN SIAR**

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Date: 09 April 2025

Your Reference:

Our Reference: 25/00026/SCOPING

Issued by email only to:

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Magnora Offshore Wind AS  
Per Maria Conde  
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Dear Maria,

**ENVIRONMENTAL IMPACT ASSESSMENT - SCOPING OPINION RESPONSE**

<b>APPLICATION REFERENCE NO:</b>	25/00026
<b>TYPE OF APPLICATION:</b>	Scoping Opinion
<b>REQUEST RECEIVED:</b>	30 January 2025
<b>APPLICANT:</b>	Magnora Offshore Wind
<b>DEVELOPMENT PROPOSAL:</b>	Construct and operate a 400kV AC substation and associated underground cable infrastructure on land
<b>LOCATION OF DEVELOPMENT:</b>	Talisk Onshore Substation Arnish, Isle Of Lewis

**1. INTRODUCTION / OVERVIEW**

This scoping opinion is issued by Comhairle nan Eilean Siar to Magnora Offshore Wind AS ("the Applicant") in response to a request dated 30 January 2025 for a scoping opinion under the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulation 2017 in relation to the above development proposal.

The scoping opinion request was accompanied by the Onshore Scoping Report v 3.0 (the Report and this Response refers to the Chapter (and Paragraph Numbers) adopted in the Report.

The area of Search /onshore scoping boundary is very large in terms of area. The site encompasses other developments which includes the proposed site of the SSEN HVDC Converter Station, The proposed site of Spiorad na Mara offshore windfarm Sub-station, MacAulay Farm college, the access to the Deep Water Port and the Arnish Industrial Estate. The point of Cable Landfall has yet to be determined.

While acknowledging the need to ensure the Project Design (Rochdale) Envelope (PDE) approach is adopted, the size of the Area of Search make it challenging to respond with detailed comments or in some instances provide a clear opinion on whether a topic can be scoped out. It is noted that further refinements will be carried out through the EIA and consultation processes.

We advise that the site and design variables should be reduced to a minimum and the extent of the site and design parameters be more specific, ahead of any application submission for planning permission.

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

## **2. POLICY AND LEGISLATION**

The Development Plan section of Comhairle nan Eilean Siar has made the following comments.

### **National Development Context and Renewable Energy Policy**

In 2019 the Scottish Government declared a climate emergency. The [Climate Change \(Scotland\) Act 2009](#) sets out the legal framework for climate action in Scotland.

An ambitious net zero emissions target of all greenhouse gases by 2045 has been set by the Scottish Government under the [Climate Change \(Emissions Reduction Targets\) \(Scotland Act\) 2019](#).

[Update to the Climate Change Plan 2018 – 2032 Securing a Green Recovery on a Path to Net Zero \(2020\)](#) sets out the pathways to these new targets.

The Scottish Government, in its Draft Energy Strategy and Just Transition Plan, has set a new target for an additional 20GW of new low carbon renewable electricity generation by 2030, including 12GW of new onshore wind. The Scottish Government has also consulted on increasing its current offshore wind target of 11GW by 2030, with its final Energy Strategy and Just Transition expected by summer 2024. Further detail may be found in the [Draft Energy Strategy and Just Transition Plan – delivering a fair and secure zero carbon energy system for Scotland](#) (2023)

Other relevant policy includes:

[Climate Ready Scotland: Second Scottish Climate Change Adaptation Programme 2019-2024 \(September 2019\)](#)

The Outer Hebrides is well placed to contribute to meeting new zero targets, the [National Islands Plan \(2019\)](#) includes commitments related to this objective. Together with the [National Islands Plan Implementation Route Map 2020 – 2025 \(2021\)](#)

### **The Development Plan**

In February 2023 Scottish Government adopted National Planning Framework 4 which together with the Outer Hebrides Local Development Plan, (including the Outer Hebrides Wind Energy Development Supplementary Guidance\*, form the statutory Development Plan).

## National Planning Framework 4

For consent handling purposes the proposal is a significant development of national importance that will help deliver Scotland's spatial strategy. It is part of Energy Innovation Development on the Islands.

NPF4 states that a development contributing to 'Energy Innovation Development on the Islands' in the location described [**Outer Hebrides – Supporting the Arnish Renewables Base and Outer Hebrides Energy Hub**], within one or more of the Classes of Development described below and that is of a scale or type that would otherwise have been classified as 'major' by 'The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009', is designated a national development: Electricity transmission cables and converter stations on and/or off shore of 132 kilovolts (kv) and above;

### NPF4 Planning Policy

National development status does not grant planning permission for the development and all relevant consents are required. Their designation means that the principle of the development does not need to be agreed in later consenting processes, providing more certainty for communities, business and investors [...] Decision makers for applications for consent for national developments should take into account all relevant policies.

The principal policy against which the development proposal will be assessed is Policy 11: Energy where the policy intent is to encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).

Other relevant policies which the development proposal will be assessed against include:

NPF4 Policy 1: Tackling the climate and nature crises;

NPF4 Policy 2: Climate mitigation and adaptation;

NPF4 Policy 3: Biodiversity;

NPF4 Policy 4: Natural places;

NPF4 Policy 5: Soils;

NPF4 Policy 6: Forestry, woodland and trees

NPF4 Policy 7: Historic assets and places;

NPF4 Policy 12: Zero Waste;

NPF4 Policy 14: Design, quality and place;

NPF4 Policy 22: Flood risk and water management;

NPF5: Policy 25: Community Wealth Building

NPF4 Policy 29: Rural Development

NPF4 Policy 33: Minerals

## **Local Development Plan Policy**

The development will be assessed against the Outer Hebrides Local Development Plan, in this case principally:

Policy EI 8: Energy and Heat Resources

Policy DS1 Development Strategy;

Policy PD1 Placemaking and Design;

Policy PD2: Car Parking and Roads Layout;

Policy PD4: Zero and Low Carbon Buildings;

Policy PD6: Compatibility of Neighbouring Use;

Policy EI 1: Flooding;

Policy EI 4 Waste Management;

Policy EI 5: Soils;

Policy EI 7: Countryside and Coastal Access

Policy ED5: Minerals;

NBH1: Landscape;

NBH2: Natural Heritage;

NBH4: Built Heritage;

NBH5: Archaeology;

NBH6: Historic Areas.

Local planning policy is provided in the Outer Hebrides Local Development Plan (OHLDP) adopted in 2018 and its revised Supplementary Guidance for Wind Energy Developments (SG) adopted November 2021.

In this case the Comhairle makes a determination based on the statutory development plan comprising NPF4 which gives primacy to the climate and nature emergency, the Outer Hebrides Local Development Plan, the Wind Energy Development Supplementary Guidance and other material considerations. The SG remains relevant and part of the LDP and wider Development Plan. It is only in areas of dispute with NPF4 that this becomes a matter for the decision maker.

The principal LDP policy the development will be assessed against will be Policy EI 8: Energy and Heat Resources which states that the Comhairle will support proposals that contribute to meeting the targets and objectives of the National Planning Framework, the Climate Change Act, and the National Renewables Infrastructure Plan in relation to electricity grid reinforcement, infrastructure and renewable energy generation subject to accordance with the Local Development Plan.

## **OHLDP Spatial Strategy**

As defined by the LDP Development Strategy the development site is located Outwith Settlement in the OHLDP Spatial Strategy, but adjacent to the Main Settlement of Stornoway.

Within 'outwith settlement' areas the principal policy objective is to direct appropriate resource based activity and ensure development has a quality of siting and design suitable to a more open and rural setting. The developer must demonstrate a justified need for the proposed development in the location, unless directed by the Wind Energy spatial strategy (OHLDP Policy DS1).

All development proposals will be assessed against the capacity of the surrounding landscape to accommodate the development. Development proposals should avoid raised or high-level locations to minimise visual impact (supplementary information to support this is likely to be required early in the application process).

There is potential for the landfall to be close to settlement and partly within the identified developed coast as set out on the OH LDP. This needs further consideration.

### **3. PROPOSED PROJECT AND AREA OF SEARCH**

The Scoping Site boundary of the Proposed Development is illustrated at Figure 1.1 of the Report.

The onshore Proposed Study Area is located approximately 1.5km south-west of Stornoway Isle of Lewis, Western Isles. The red line boundary encloses the search area within which the Developer seeks to identify a suitable site for the Proposed Development.

The design parameters and components of the Proposed Development are set out in Section 3.4 of the Report and in summary comprise:

#### **Landfall**

Where the offshore export cable comes ashore this will most likely be installed using Horizontal Directional Drilling (HDD) across the intertidal zone. Other methods, like open-cut trenching, will also be considered. A subsurface joint bay will be installed in close proximity to the landfall location to enable the joining of the offshore export cable with the onshore infrastructure.

#### **Underground cables**

Installation of a High Voltage Alternating Current (HVAC) UGC of approximately 5km between the landfall and new substation. Installation of UGC between the new substation and grid connection point (SSEN HVDC converter station).

#### **Substation**

Construction of a new substation with an indicative development area footprint of 120x140m (including buildings, roads, landscaping etc.) and a building height of 17m (assumed technical specification base on similar infrastructure).

#### **Ancillary Works**

Ancillary works (required during the construction phase) are yet to be determined but may include:

Vegetation clearance, temporary and permanent access, establishment of temporary site compounds;

Further some road upgrades may be required including potential utility diversions and full details of construction traffic and transport analysis, impacts and controls will be detailed in a Construction and Traffic Management Plan.

## Construction Compounds

Temporary Construction compounds will be required during the construction period. These will be located within the site boundary and will contain office and welfare facilities, parking, laydown areas and holding and servicing space for construction machinery.

In addition to the above consideration requires to be given by the applicant to the need for

- extraction of rock from borrow pits or quarries;
- Disturbance or translocation of carbon rich soils including temporary storage and peat reuse proposals including potentially peatland restoration proposals (on or off site)
- Landscaping proposals
- Reinstatement of construction compounds and other temporary works
- Any proposals to phase the civil engineering/construction works

## 4. PROPOSED EIA METHODOLOGY

### Cumulative Assessment – Paragraph 4.5

Stornoway Windfarm, Druim Leathann Windfarm and Uisenis Windfarm all onshore windfarms of scale with development programmed in the 2027 – 2030 period should be added to those projects for which cumulative effects may arise.

No other comments

## 5. LANDSCAPE AND VISUAL AMENITY

### General points

#### *ZTV Resolution*

The resolution of the ZTV should be high resolution and can be submitted direct to Comhairle nan Eilean Siar (and not reduced below 10 MB as has become practice).

The Comhairle can accept high resolution files via Sharepoint and request that a High Resolution version is submitted as part of the EIA Report.

**Do you agree with the data sources and site visit approach listed in Appendix A, and any additional anticipated data listed in Section 5.7, being used to inform the LVIA baseline?**

Yes. we agree.

Together with NatureScot we would appreciate being consulted, when finalising a list of viewpoints for visualisations and assessment through LVIA

**Are there additional sources of information which should inform the baseline and assessment of potential effects on landscape/coastal/seascape character and designated landscapes?**

No

**Do you agree with the study area proposed to assess effects on landscape and visual receptors?**

Yes

**Do you agree that the landscape receptors related to the assessment of effects on landscape features and landscape character have been identified?**

Yes

**Do you agree that key visual receptors related to the assessment of effects on views and visual amenity have been identified?**

Yes largely but once the actual site is identified and a more detailed ZTV is available we would request the opportunity to consider inclusion of additional viewpoints. For visualisations, viewpoint final locations will require micro siting and refining in the field to obtain the worst-case scenario view of the proposed development, using high points, avoiding foreground obstacles such as trees/built environment

A point on the Calmac ferry route approaching Stornoway should be included as a visual receptor (accepting that there are some limitations to a viewpoint from a moving vessel).

*Routes 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; etc.

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".

**Do consultees have any comments/suggestions on the proposed list of locations identified Section 5.4 that will be used as the basis of the identification of representative viewpoint locations?**

Yes

**Do you agree that all potential likely significant effects have been identified for the LVIA?**

Yes

**Do you agree with the Project impacts which have been scoped out of the LVIA?**

See below

**Do you agree with the scoping in and out of impacts related to the LVIA?**

We would wish to review Impacts (night-time) of lighting on landscape character and visual receptors and views once the site is identified.

Agree in relation to receptors beyond 3km

**Do you agree with the approach to cumulative assessment that will be used to assess cumulative effects on landscape and visual receptors?**

Yes but Stornoway Windfarm and other nearby turbines should be included as part of the cumulative assessment as should the Spiriod na Mara Substation if its location has been finalised prior to design freeze.

**Do you agree with the proposed assessment methodology related to the LVIA?**

Yes

## 6. ECOLOGY AND ORNITHOLOGY

**Do you agree with the proposed scope of the desk study and field surveys proposed, and that a single year of ornithology surveys is sufficient to establish a suitably robust ornithological baseline?**

- Yes . However please note: Impacts upon the Schedule 1 species hen harrier and merlin are likely to be highly important at this location. The habitat appears especially suitable for these species. The site is close to what has been the centre of the expanding hen harrier population in Lewis in recent years.

**Do you agree that at this stage all receptors related to Ecology and Ornithology have been identified?**

Yes- The Comhairle welcomes scope to extend beyond the 5 km the Study Area, if appropriate in relation to ornithology and ecology per para 6.2.1.

**Do you agree with the scoping in and out of impacts related to Ecology and Ornithology?**

- Yes

**Do you agree with the assessment of cumulative effects related to Ecology and Ornithology?**

- Yes

**Do you agree with the proposed assessment methodology related to Ecology and Ornithology?**

- Yes

Note:

Proposals for offsetting and enhancement will also be important considerations at this site

## 7. ARCHAEOLOGY AND CULTURAL HERITAGE

### Comhairle Archaeology Response

The subject of Archaeology and Cultural Heritage is considered in Chapter 7, of the Scoping Report.

The report identifies the range of known cultural heritage assets (both designated and undesignated) and considers the potential for unknown, buried archaeological deposits that maybe impacted by the project phases (construction, operation & decommissioning) .

The cultural heritage assets identified have been presented in a study area comprising of the site boundary & 500 m buffer zone. A wider 10km study area will consider potential setting impacts, supported by LVIA. Appropriate baseline information was compiled using CnES Historic Environment Record and designation data from Historic Environment Scotland, further data sources will be studied to inform the historic environment chapter of the EIA.

Potential significant effects from the proposal are identified in Section 7.6 as Direct, Indirect (Setting) and Cumulative. It is noted that the proposed development boundary covers a wide area and that this will be refined with further design parameter inputs. Further assessment of cultural heritage assets is proposed in the form of Desk Based Assessment supported by walkover survey and this will inform mitigations strategies for the EIA.



Comhairle Archaeology Service has concern as to whether it is appropriate to scope out onshore impacts from the offshore array, in particular consideration of North Rona and Sula Sgeir. This could be discussed further with the Comhairle Archaeology Service once the final site is identified.

As a large part of the proposed development area comprises of a peatland environment, unknown buried archaeology has been considered ; however, this should also include palaeo-environmental deposits.

Additionally, it is worth noting at this early stage, the 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).

Finally, the Archaeology Service welcomes the consideration of UXO potential, but noted the report in Appendix B was not present.

### **Historic Environment Scotland Response**

#### **Proposed development**

We understand that the proposed development comprises the onshore elements of Talisk Floating Offshore Wind Farm, including a 400kv AC substation and associated underground cables. A preferred site is yet to be determined, but the broad study area lies to the west of Arnish Point, partially within but principally to the south of the Lews Castle and Lady Lever Park GDL, and to the east of the A859.

The works comprise a new substation with a building area of 120m by 140m and up to 17m in height, approximately 5km of underground cables, horizontal directional drilling for the landfall site, ancillary clearance works and compounds. The Scoping Report indicates that most of the proposed underground cable would be accommodated beneath and within ongoing upgrades to the Arnish access road.

#### **Scope of assessment**

We recommend that the applicant refers to the [EIA Handbook](#) for best practice advice on assessing cultural heritage impacts.

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, adding associative value to the cultural significance of the monument.

Its setting is one of local prominence; it overlooks Stornoway harbour, and it was later incorporated into the designed landscape surrounding Lews Castle, but prior to the planting of forestry around it the cairn would have had much wider views in all directions including across the broad study area.

Given the topography, and on the assumption that direct impacts on the GDL will be avoided and therefore the development is likely to be located to the south of the Arnish access road, it is likely that the proposed development will be clearly visible in outward and inward views to and from the monument. As such, there is the potential for the development to detract from an appreciation of the localised prominence of the cairn that forms part of its setting. This impact should be assessed using a detailed ZTV assessment and photomontages as required. At this stage it is not possible to assess the likely severity of the impact on the setting of the monument.

- **Arnish Point, gun emplacements (SM5347)**

The monument comprises the remains of a WW2 emergency coastal battery surviving as concrete emplacements for two 4.7-inch calibre guns, two searchlight plinths, and a command post. Surrounding the complex are the remains of a hutted encampment, access roads, and service conduit. Its setting is focused on key views associated with the approaches and mouth of Stornoway Harbour.

Direct impacts on the monument by the landfall of the subsea cable must be avoided. The proposed development is likely to be landward and inland of the key views associated with the setting of this monument, and therefore outward views from the monument are not likely to be subject to significant adverse impact. There is the possibility that infrastructure may be present in the background of inward views of the gun emplacements from the sea; whilst this impact should be assessed, consideration should also be given to the cumulative impact of existing, consented, and proposed infrastructure in the Arnish area. This impact should be assessed with a detailed ZTV, and photomontages as required.

- **Loch Arnish, dun (SM5397)**

The monument 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 thus being used as a form of defence. This tends to create a defined and discrete setting.

Depending on the eventual location of the proposals, it is possible that it might be visible from the dun itself and in the background of some views of the dun from the southern or eastern shores of the loch which would impact its tightly topographically defined setting. This impact should be assessed with a detailed ZTV, and photomontages as required.

**Druim Dubh stone circle (SM5504)**

The stone circle is located to the south-west of the study area and comprises an elliptical ring of fallen standing stones, partly peat-covered, standing on a low flat-topped, hillock just north of the A859 public road. The ring contains sixteen stones, evenly spaced around the perimeter of an ellipse 28m by 21m overall. Nine of the stones are buried beneath peat while the seven visible stones were formerly peat-covered and have been revealed by peat-cutting. There are remains of sockets with packing stones beside most of the stones, supporting the contention that they were at one time erect. The cultural significance of the monument is vested in its survival as one of only ten megalithic rings in the Western Isles.

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 within the

landscape. It is an inland site which is unusual as most prehistoric ritual sites on the Western Isles are in coastal locations. Its setting therefore includes wide open outward and reciprocal inward views in all directions. Whilst there is small-scale modern development to its immediate east, and an overhead line to its north-west, these structures do not overly affect the current appreciation of those wider views and the scale and distribution of the modern development does not 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. As such, there is the potential for an adverse impact on an appreciation of the monument and its setting within the broader landscape. Any impact should be assessed using a detailed ZTV and photomontages, as required.

Category A-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 incorporates elements of the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263). In the first instance we recommend the avoidance of works within the designated boundary for the GDL. Should any works be proposed within the designated boundary of the GDL, we would welcome further consultation prior to the submission of the planning application.

We welcome that these heritage assets will be scoped into the EIA assessment. We recommend the use of a detailed ZTV and photomontages for these assets to inform the EIA report.

HES Advice

Whilst direct impacts will need to be avoided in the first instance, HES note that a viewshed (Fig 5.2) based on the entire study area and indicative maximum height of the proposed infrastructure demonstrates that there is the potential for adverse setting impacts on the above heritage assets.

### **Scoping Questions (7.8)**

Neither HES nor the Comhairle Archaeology Service responded to the specific questions posed. These can be addressed further through pre-application engagement once a final site has been selected.

## **8. GEOLOGY, AND PEAT SOILS**

It would be helpful if the EIA utilises the same standard map colourations as used in the Scotland's Carbon and Peatland Map 2016 when depicting carbon soils.

**Do you agree with the use of those data listed in Appendix A, and any additional anticipated data listed in Section 8.7, being used to inform the Onshore EIA?**

YES

- **Do you agree that all receptors related to Geology and Peat have been identified?**

No - See SEPA advice below

- **Do you agree with the scoping in and out of impacts related to Geology and Peat?**

This depends on the selected site. We accept that there are no geological designated sites within the search area but that alone may not be the sole factor to be considered. This should be reviewed once the development site is identified.

- **Do you agree with the assessment of cumulative effects related to Geology and Peat?**

No - See SEPA site specific advice below

- **Do you agree with the proposed assessment methodology related to Geology and Peat?**

**See SEPA advice below**

**SEPA General advice**

*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 below, be addressed to our [SEPA] satisfaction in the EIA process. This provides details on our information requirements and the form in which they must be submitted.*

**Site specific comments**

SEPA provide site specific comments to help the developer focus the scope of the assessment. See below:

*We note that the onshore Proposed Study Area encompasses a large area; however, we are aware of multiple projects already proposing development within this area. As well, we are aware of the many constraints contained within the proposed red line boundary. We would encourage the applicant to discuss these other proposed projects with the local authority, as we would expect joint consideration to be given to construction timings, construction methods and future proofing the area to minimise consecutive impacts on the environment, including the final location and use of excavated peat.*

*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. Due to the number and scale of projects in this area that are located on peat, we would encourage the applicant to discuss their proposals with us at an early stage.*

*The peat depth survey should be used to demonstrate that the proposal has avoided the deepest areas of peat (peat over 1m), including temporary infrastructure. Completion of an NVC survey (Sections 4 & 5 of the appendix below) should demonstrate that all near natural wetlands have been avoided. Please see our [updated guidance](#) on Groundwater Dependent Terrestrial Ecosystems. [Good practice during wind farm construction / naturescot](#) also provides useful information on NVC survey method and mapping requirements.*

## **Detailed scoping requirements (non-site specific)**

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 sets out minimum information requirements and SEPA 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.

### **SEPA – Generic Scoping advice**

#### **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) 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.

## **9.0 HYDROLOGY AND HYDROGEOLOGY**

### **General Comment**

We would draw the Developer's attention to SEPA's requirement for 10m and 15m buffers on each side of watercourses, and would seek an expansion of the definition of what constitute a 'significant watercourse' as cited in para 9.5.1.

We defer to SEPA in regard to requirement for a FRA and would seek that this is not discounted until detailed design information is available.

Per paras 9.6.1 and 9.6.2 we would anticipate that any aspects that are scoped out once further design information is available are justified.

**Do you agree with the use of those data listed in Appendix A, and any additional anticipated data listed in Section 9.7, being used to inform the Onshore EIA?**

Yes

**Do you agree that all receptors related to Hydrology have been identified?**

Yes

**Do you agree with the scoping in and out of impacts related to Hydrology?**

It is noted that the Report acknowledges that some impacts may be able to be scoped out when design information is available, and that this scoping will be revisited in the ES to update as necessary.

**Do you agree with the assessment of cumulative effects related to Hydrology?**

This requires review once the site is identified. Please note that a number of other projects are proposed within the Area of Search and depending on their location versus your site, there could be cumulative effects.

**Do you agree with the proposed assessment methodology related to Hydrology?**

Yes

## **10. NOISE and VIBRATION**

Comhairle nan Eilean Siar Environmental Health has reviewed the Scoping Report and agree to the proposed approach to the methodology and scope set out in Chapter 10 Noise and Vibration.

No further comment in response to scoping questions.

## **11. TRAFFIC AND TRANSPORT**

General response by Comhairle Assets (Engineering- Roads)

The scale of the project will have a significant impact on the road network.

A large proportion of the road network is founded on peat deposits. It would be sensible to class the whole network as potentially sensitive which would bring in the 10% increase limit rather than 30% stated in the Assessment Methodology for Traffic and Access(11.7.5) . The assessment will look at the worst case phase of the project affecting Traffic and Transport which will be the construction phase. Some information should be provided showing traffic levels during the operational phase.

The construction phase of the proposed development may clash with other large projects, and this should be considered as part of the assessment.

Traffic Management Plans should consider different stages and types of traffic movements throughout the project with some information on vehicle type, loading and the frequency of trips.

Permanent damage/impact to the existing road network from the construction phase is highly likely. Assessment and mitigation proposals including detailed pre works condition surveys, detailed

assessment of construction traffic levels/frequency will be necessary to enable identification of road network locations at highest risk of damage. The developer could be held responsible for any damage to the road network as a result of the works.

Routes for Abnormal Loads should be checked for pinch points and any mitigation works required. Any structures crossed by these loads should be assessed beforehand.

Do you agree with the use of those data listed in Appendix A being used to inform the Onshore EIA?  
Do consultees hold any traffic data for the study area?

Please Contact Comhairle Roads.

It is the responsibility of the developer to provide traffic data. Please note that historic traffic data may be of limited value if there is a cumulation of developments related to wind energy and electricity infrastructure being developed in the same period.

- Do you agree that all receptors related to Traffic and Transport have been identified?

This requires review once the site is known

- Do you agree with the scoping in and out of impacts related to Traffic and Transport?

Yes but an indication of the vehicles to be used and frequency of visits should be confirmed before the operational phase is scoped out.

- Do you agree with the assessment of cumulative effects related to Traffic and Transport?

This requires review once the site and programme for various projects in the same area is known

- Do you agree with the proposed assessment methodology related to Traffic and Transport?

Given the potential for a cumulation of major developments related to wind energy and electricity infrastructure being developed in the same period, in and around the same area, this would require further review once the site and programme for various projects in the area of search and near vicinity are known. From 2026 onwards there will be logistical challenges as projects seek to go into construction to broadly similar timescales. The potential cumulative impact of increased traffic and heavy loads should also be addressed and the EIAR should provide a mitigation strategy

### **General points**

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

In response to other scoping exercises in the same area, the Lochs Community Council has noted that the cycle lane on the Lochs Road (A859) currently ends at the Creed Park Recycling entrance. The proposed SSEN site entrance, and Arnish Junction, are located just north of this, in proximity to a blind summit and blind corner. This section of the A859 is considered potentially dangerous for cyclists. The increase in heavy and slow-moving plant vehicles crossing blindly into any additional site entrance on the A859 and on/off the Arnish Road could have a major impact on cyclist and road user safety.

Surface water flooding on this stretch of the A859 occurs periodically from near the Creed Recycling Centre at NGR 139,619E 931,542N and at Macaulay Farm NGR 140,107E 932,168N.

Mitigation measures should be identified if a new access is proposed onto the A859

Any 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. large indivisible loads to be shipped by road (rather than Port to Port)

## **12. SOCIO-ECONOMICS**

**Do you agree with the use of the data sets listed in Appendix A, and any additional anticipated data listed in Section 12.7, being used to inform the Onshore EIA?**

Comhairle nan Eilean Siar does not have an economist on staff and therefore provide limited input on this topic of the Scoping Report. The developer is advised to engage with [Highlands and Islands Enterprise](#) who have extensive knowledge of socio economic impact assessment work in the Highlands and Islands of Scotland

**Do you agree that all receptors related to Socioeconomics, Tourism, Recreation and Land Use have been identified?**

Potentially - 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

**Do you agree with the scoping in and out of impacts related to Socioeconomics, Tourism, Recreation and Land Use?**

Yes

**Do you agree with the assessment of cumulative effects related to Socioeconomics, Tourism, Recreation and Land Use?**

No comment

**Do you agree with the proposed assessment methodology related to Socioeconomic, Tourism, Recreation and Land Use?**

No comment

## **13. POPULATION AND HUMAN HEALTH**

**Do you agree Human Health can be scoped out of further assessment in the EIA?**

Prior to taking a decision to Scope in or Scope out, a further review of this issue is required.

Impacts and effects in isolation and in cumulation with the other identified developments – influx of additional workforce numbers; how many/for how long/how it is proposed they will be housed (housing strategy); 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 workers housing strategy should also be prepared.

## 14. AIR QUALITY

**Do you agree the Air Quality topic can be scoped out of the EIA?**

Yes - Environmental Health has reviewed and agree to what has been scoped in and out.

## 15. CLIMATE CHANGE

- Do you agree with the proposed assessment methodology related to Climate Change?
- Do you agree with the use of those data listed in Appendix A, being used to inform the Onshore EIA?
- Do you agree that all receptors related to Climate Change have been identified?
- Do you agree with the scoping in and out of impacts related to Climate Change?
- Do you agree with the assessment of cumulative effects related to Climate Change?

Comhairle nan Eilean Siar does not currently have an inhouse resource on climate change and is therefore unable to offer comments on this topic.

## 16. MAJOR ACCIDENTS AND DISASTERS

**Do you agree with the proposed approach to scope out further assessment of Major Accidents and Disasters?**

Yes

## 17. OTHER ISSUES

- **Electric and Magnetic Fields (EMF)** - -- Scoped Out – Agreed
- **Telecommunications** – This requires further exploration as at the proposed height and depending on the location the proposed sub-station building may interfere with licenced links – Not agreed at this time
- **Unexploded Explosive Ordnance (UXO)** - Comhairle nan Eilean Siar hold no information on the likelihood of UXO in and around the area of search.
- **Aviation** – Note the consultation advice of National Air Traffic Scotland and Highlands and Islands Airports in relation to potential impacts on aviation and the need for assessment and potentially mitigation

I trust the foregoing is of assistance.

Yours faithfully



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

Encl: Appendix 1 – Consultation Responses

## Consultation Responses

Nature.Scot	<p><b>Chapter 5 – Landscape and Visual Impacts</b></p> <p>Do you agree with the data sources and site visit approach listed in Appendix A, and any additional anticipated data listed in Section 5.7, being used to inform the LVIA baseline?</p> <ul style="list-style-type: none"> <li>• Yes, we agree. We would appreciate being consulted, along with the local planning authority, when finalising a list of viewpoints for visualisations.</li> </ul> <p>Are there additional sources of information which should inform the baseline and assessment of potential effects on landscape/coastal/seascape character and designated landscapes?</p> <ul style="list-style-type: none"> <li>• No.</li> </ul> <p>Do you agree with the study area proposed to assess effects on landscape and visual receptors?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree that the landscape receptors related to the assessment of effects on landscape features and landscape character have been identified?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree that key visual receptors related to the assessment of effects on views and visual amenity have been identified?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do consultees have any comments/suggestions on the proposed list of locations identified Section 5.4 that will be used as the basis of the identification of representative viewpoint locations?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree that all potential likely significant effects have been identified for the LVIA?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree with the Project impacts which have been scoped out of the LVIA?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree with the scoping in and out of impacts related to the LVIA?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p><b>Chapter 6 – Ecology and ornithology</b></p> <p>The following scoping questions refer to the Ecology and Ornithology chapter and are designed to focus the scoping exercise and inform the Scoping Opinion:</p> <p>Do you agree with the proposed scope of the desk study and field surveys proposed, and that a single year of ornithology surveys is sufficient to establish a suitably robust ornithological baseline?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree that at this stage all receptors related to Ecology and Ornithology have been identified? Yes</p> <p>Do you agree with the scoping in and out of impacts related to Ecology and Ornithology?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul>
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	<p>Do you agree with the assessment of cumulative effects related to Ecology and Ornithology?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree with the proposed assessment methodology related to Ecology and Ornithology?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p><b>Chapter 7 – Geology and Peat</b></p> <p>The following scoping questions refer to the Geology and Peat chapter and are designed to focus the scoping exercise and inform the Scoping Opinion:</p> <p>Do you agree with the use of those data listed in Appendix A, and any additional anticipated data listed in Section 8.7, being used to inform the Onshore EIA?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree that all receptors related to Geology and Peat have been identified?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree with the scoping in and out of impacts related to Geology and Peat?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree with the assessment of cumulative effects related to Geology and Peat?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Do you agree with the proposed assessment methodology related to Geology and Peat?</p> <ul style="list-style-type: none"> <li>• Yes</li> </ul> <p>Further we note that the scoping report highlights the obligations imposed by NPF4, including for biodiversity net gain, which will be addressed in the EIA process.</p> <p>NatureScot are happy to meet further to discuss any issues raised here. The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.</p>
<b>Historic Environment Scotland</b>	<p>Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 6 February 2025. 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.</p> <p>Your local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include topics covered by our advice-giving role, and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.</p> <p><b>Proposed development</b></p>

We understand that the proposed development comprises the onshore elements of Talisk Floating Offshore Wind Farm, including a 400kv AC substation and associated underground cables. A preferred site is yet to be determined, but the broad study area lies to the west of Arnish Point, partially within but principally to the south of the Lews Castle and Lady Lever Park GDL, and to the east of the A859.

The works comprise a new substation with a building area of 120m by 140m and up to 17m in height, approximately 5km of underground cables, horizontal directional drilling for the landfall site, ancillary clearance works and compounds. The Scoping Report indicates that most of the proposed underground cable would be accommodated beneath and within ongoing upgrades to the Arnish access road.

#### **Scope of assessment**

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

We welcome that our interests will be scoped into the EIA assessment. We have identified likely significant effects on our historic environment interests. 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. 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](mailto:hmconsultations@hes.scot). If you have questions about this response, please contact Sam Fox at [samuel.fox@hes.scot](mailto:samuel.fox@hes.scot).

#### **ANNEX**

##### **Background**

We have had no previous involvement with the development. However, we have recently provided comments in relation to other developments within the proposed development boundary.

##### **Stornoway Deep Water Port (Our Reference 300023529)**

We have provided comments in relation to the onshore and offshore elements for the creation of the Stornoway Deep Water Port. We provided comments on the onshore elements in 2019 and we did not object to the proposals.

##### **Arnish Onshore Converter Station and Substation (Our Reference 300055997)**

We have been involved in pre-application discussions with SSEN in relation to a new High Voltage Direct Current (HVDC) Converter Station in the vicinity of Arnish Point. The works comprise the formation of a 60ha compound



	<p>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 proposals to the network.</p> <p>We provided comments in response to a Scoping consultation in October 2024, and we requested that numerous heritage assets within the vicinity of the proposals be included in the assessment for the proposals, such as Cnoc na Croich chambered cairn (SM6550), Druim Dubh stone circle (SM5504) and Lews Castle (LB18677/GDL00263). However, we were unable to provide a view of the potential impacts of the proposals due to a lack of information provided at Scoping such as finalised design plans or draft visualisations.</p> <p><b>Our Interests</b></p> <p><b>Scheduled Monuments</b></p> <p>There are three scheduled monuments within the broad study area (plus one slightly further to the south-west) that have the potential to be subject to adverse impacts on their settings. Of these, <b>Cnoc na Croich chambered cairn (SM6550)</b> is likely to have the greatest potential for adverse impacts on its setting.</p> <p><b>Cnoc na Croich chambered cairn (SM6550)</b>  This monument is located atop a wooded hillock in the grounds of Lews Castle near Stornoway. It comprises the remains of a prehistoric chambered cairn around 30m in diameter, with a covering of scrub, surmounted by a later cairn and flagpole. The hilltop is the supposed location of medieval gallows, adding associative value to the cultural significance of the monument.</p> <p>Its setting is one of local prominence; it overlooks Stornoway harbour, and it was later incorporated into the designed landscape surrounding Lews Castle, but prior to the planting of forestry around it the cairn would have had much wider views in all directions including across the broad study area.</p> <p>Given the topography, and on the assumption that direct impacts on the GDL will be avoided and therefore the development is likely to be located to the south of the Arnish access road, it is likely that the proposed development will be clearly visible in outward and inward views to and from the monument. As such, there is the potential for the development to detract from an appreciation of the localised prominence of the cairn that forms part of its setting. This impact should be assessed using a detailed ZTV assessment and photomontages as required. At this stage it is not possible to assess the likely severity of the impact on the setting of the monument.</p> <p><b>Arnish Point, gun emplacements (SM5347)</b>  The monument comprises the remains of a WW2 emergency coastal battery surviving as concrete emplacements for two 4.7-inch calibre guns, two searchlight plinths, and a command post. Surrounding the complex are the remains of a hutted encampment, access roads, and service conduit. Its setting</p>
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	<p>is focused on key views associated with the approaches and mouth of Stornoway Harbour.</p> <p>Direct impacts on the monument by the landfall of the subsea cable must be avoided. The proposed development is likely to be landward and inland of the key views associated with the setting of this monument, and therefore outward views from the monument are not likely to be subject to significant adverse impact. There is the possibility that infrastructure may be present in the background of inward views of the gun emplacements from the sea; whilst this impact should be assessed, consideration should also be given to the cumulative impact of existing, consented, and proposed infrastructure in the Arnish area. This impact should be assessed with a detailed ZTV, and photomontages as required.</p> <p><b>Loch Arnish, dun (SM5397)</b></p> <p>The monument 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.</p> <p>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 thus being used as a form of defence. This tends to create a defined and discrete setting.</p> <p>Depending on the eventual location of the proposals, it is possible that it might be visible from the dun itself and in the background of some views of the dun from the southern or eastern shores of the loch which would impact its tightly topographically defined setting. This impact should be assessed with a detailed ZTV, and photomontages as required.</p> <p><b>Druim Dubh stone circle (SM5504)</b></p> <p>The stone circle is located to the south-west of the study area and comprises an elliptical ring of fallen standing stones, partly peat-covered, standing on a low flat-topped, hillock just north of the A859 public road. The ring contains sixteen stones, evenly spaced around the perimeter of an ellipse 28m by 21m overall. Nine of the stones are buried beneath peat while the seven visible stones were formerly peat-covered and have been revealed by peat-cutting. There are remains of sockets with packing stones beside most of the stones, supporting the contention that they were at one time erect. The cultural significance of the monument is vested in its survival as one of only ten megalithic rings in the Western Isles.</p> <p>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 within the landscape. It is an inland site which is unusual as most prehistoric ritual sites on the Western Isles are in coastal locations. Its setting therefore includes wide open outward and reciprocal inward views in all directions. Whilst there is small-scale modern development to its immediate east, and an overhead line to its north-west, these structures do not overly</p>
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	<p>affect the current appreciation of those wider views and the scale and distribution of the modern development does not overwhelm the monument.</p> <p>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. As such, there is the potential for an adverse impact on an appreciation of the monument and its setting within the broader landscape. Any impact should be assessed using a detailed ZTV and photomontages, as required.</p> <p><b>Category A-listed Buildings and Garden and Designed Landscapes (GDLs)</b></p> <p>We note that the preferred site is located immediately to the south of the Category A-listed Lews Castle (LB18677) and incorporates elements of the Lews Castle and Lady Lever Park Inventory garden and designed landscape (GDL00263). In the first instance we recommend the avoidance of works within the designated boundary for the GDL. Should any works be proposed within the designated boundary of the GDL, we would welcome further consultation prior to the submission of the planning application.</p> <p>We welcome that these heritage assets will be scoped into the EIA assessment. We recommend the use of a detailed ZTV and photomontages for these assets to inform the EIA report.</p> <p><b>Our Advice</b></p> <p>Whilst direct impacts will need to be avoided in the first instance, we note that a viewshed (Fig 5.2) based on the entire study area and indicative maximum height of the proposed infrastructure demonstrates that there is the potential for adverse setting impacts on the above heritage assets.</p> <p>At this stage there is not yet sufficient clarity regarding where the proposed infrastructure might be located and thus what the visual impacts of the infrastructure might be, and therefore it is not known whether there may be scope to mitigate impacts such as using bunding or planting. We would expect these issues to be explored further as the scheme is developed and we would welcome further discussions to inform the mitigation of adverse impacts. Our position on the severity of any impacts will need to be informed by an adequate assessment produced as part of a forthcoming EIA Report.</p>
<b>CNES - Archaeology</b>	<p>Thank you for consulting the Archaeology Service. The subject of Archaeology and Cultural Heritage is considered in Chapter 7, of the Scoping Report. The report identifies the range of known cultural heritage assets (both designated and undesignated) and considers the potential for unknown, buried archaeological deposits that maybe impacted by the project phases (construction, operation &amp; decommissioning) . The cultural heritage assets identified have been presented in a study area comprising of the site boundary &amp; 500 m buffer zone. A wider 10km study area will consider potential setting impacts, supported by LVIA. Appropriate baseline information was compiled using CnES Historic Environment Record and designation data from Historic</p>

	<p>Environment Scotland, further data sources will be studied to inform the historic environment chapter of the EIA.</p> <p>Potential significant effects from the proposal are identified in Section 7.6 as Direct, Indirect (Setting) and Cumulative. It is noted that the proposed development boundary covers a wide area and that this will be refined with further design parameter inputs. Further assessment of cultural heritage assets is proposed in the form of Desk Based Assessment supported by walkover survey and this will inform mitigations strategies for the EIA.</p> <p>Archaeology Service would take this opportunity to highlight several points. As noted, the proposed development is at a variable stage in its design layout, as such the Archaeology Service has concern as to whether it is appropriate to scope out onshore impacts from the offshore array, in particular it would like to see consideration of North Rona and Sula Sgeir.</p> <p>A large part of the proposed development area comprises of a peatland environment, unknown buried archaeology has been considered ; however, this must also include palaeo-environmental deposits.</p> <p>Additionally, it is worth noting at this early stage, the 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).</p> <p>Finally, the Archaeology Service welcomes the consideration of UXO potential, but noted the report in Appendix B was not present.</p>
<b>CNES – Roads</b>	<p>The scale of the project will have a significant impact on the road network.</p> <p>A large proportion of the road network is founded on peat deposits. It would be sensible to class the whole network as potentially sensitive which would bring in the 10% increase limit rather than 30% stated in the Assessment Methodology for Traffic and Access(11.7.5 ) . The assessment will look at the worst case phase of the project affecting Traffic and Transport which will be the construction phase. Some information should be provided showing traffic levels during the operational phase.</p> <p>The construction phase of the proposed development may clash with other large projects, and this should be considered as part of the assessment.</p> <p>Traffic Management Plans should consider different stages and types of traffic movements throughout the project with some information on vehicle type, loading and the frequency of trips.</p> <p>Permanent damage/impact to the existing road network from the construction phase is highly likely. Assessment and mitigation proposals including detailed pre works condition surveys, detailed assessment of construction traffic levels/frequency will be necessary to enable identification of road network locations at highest risk of damage. The developer could be held responsible for any damage to the road network as a result of the works. Routes for Abnormal Loads should be checked for pinch points and any mitigation works required. Any structures crossed by these loads should be assessed beforehand.</p>

	It is the responsibility of the developer to provide traffic data.
<b>Scottish Water</b>	<p><b>Drinking Water Protected Areas</b> 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> <p><b>Asset Impact Assessment</b> Scottish Water records indicate that there is live infrastructure in the proximity of your development area that may impact on existing Scottish Water assets.</p> <p>The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our Customer Portal for an appraisal of the proposals.</p> <p>The applicant should be aware that any conflict with assets identified will be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response.</p> <p>Written permission must be obtained before any works are started within the area of our apparatus.</p> <p><b>Surface Water</b> 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><b>Next Steps:</b> All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals</p> <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 <a href="mailto:planningconsultations@scottishwater.co.uk">planningconsultations@scottishwater.co.uk</a>.</p>
<b>AVIATION</b>	
<b>National Air Traffic Scotland</b>	<p>NATS has concerns that unmitigated the proposed developer has the potential to degrade the performance of the Sandwich Radar system located on the other side of Stornoway.</p> <p>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.</p> <p>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.</p>

<b>Highlands and Islands Airports</b>	There is insufficient information regarding the location of the proposed structure of 17m AGL, therefore we are unable to carry out an Aerodrome Safeguarding Assessment for Stornoway Airport. Until we receive this information, we would currently place a holding objection on this application.
<b>Met Office</b>	Thanks for consulting the Met Office regarding the proposal. We only need to be consulted about the offshore windfarm itself and have no concerns about the onshore elements.
<b>Ministry of Defence</b>	<p>Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (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.</p> <p>The application is for the construction and installation of the 400kV onshore cable, route, onshore substation and associated works for the Talisk Offshore Wind Farm. The indicative height of the onshore substation building is 17m and there will be approximately 5km of HVAC (High Voltage Alternating Current) cable installed though the specific landfall location has not yet been determined.</p> <p>This application relates to a site outside of Ministry of Defence safeguarding areas. Having reviewed the proposals, I can confirm the MOD has no concerns in principle with regard to the scale and massing of the proposed development indicated on the submitted plans.</p> <p>At this consultation stage, where details for the final route, design and/or maximum height of the proposed development have not been determined, MOD representations are limited to the principle of the development only. In summary the MOD has no concerns, but should be consulted at all future stages for this proposed development to complete a full detailed safeguarding assessment.</p> <p>The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled "Talisk Floating Offshore Wind Farm Onshore Scoping Report Version 2" dated 28 January 2025. 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.</p>

	I trust this is clear however should you have any questions please do not hesitate to contact me.
SSEN Transmissions	<i>No Response</i>
SSEN	<i>No Response</i>
Marine Directorate – Licensing Operations	Marine Directorate - Licensing Operations Team does not intend to comment on the planning application. If any part of the project is located below Mean High Water Springs, a marine licence may be required under the Marine (Scotland) Act 2010. Please advise the applicant to contact us directly at <a href="mailto:MD.MarineLicensing@gov.scot">MD.MarineLicensing@gov.scot</a> to seek advice on the marine licensing requirements.
Outer Hebrides Fisheries Trust	<i>No Response</i>