SEPA Consultee Response
Thank you for your consultation which was received by SEPA on 13 March 2025 in relation to the above application.

Advice for the planning authority

Due to a lack of information in relation to impacts on peat and the water environment, we submit a holding objection and request that determination is deferred until the information outlined below has been provided for our assessment.

1.Impacts on peat
Peat and NVC surveys:
1.1We note that Figure 7.1-7.4 has a UKHab and GWDTE survey. Technical Appendix 7.1: Ecology Survey Methodology and Results states that a NVC survey has been completed, however, after going through all the figures we cannot see this included in the documents provided. We therefore request that the NVC survey is submitted for review.
1.2The peat survey plans (Technical Appendix 10.1 Peat Depth Survey Results and same in the OPMP) is very high level, showing interpolated peat depths only. We can see individual probing points in Figure 10.2.4, however these are not annotated or colour coded per each probe location. We therefore request detailed probing plans where we can see the full depth of individual probing points in relation to proposed infrastructure and areas proposed for excavation. These should be submitted at a usable scale to show how the infrastructure has been positioned in relation to the surrounding peat depths.
1.3In a response to a meeting we had with the applicant (dated 28 November 2024), we asked for the following information and these requests still stand:

BP 5 was positioned between two deep basins of peat and the edge of these will require further probing to ensure impacts on these deepest pockets (4+m depths either side) are avoided. This means conducting detailed surveys outwith the intended excavations in order to "find" the edge of the deepest basins of peat.
We would also request more peat probing for BP 6, as the boundaries along deeper pockets should be identified and avoided. We do not want to see excavations into areas over 2m here.
We would also request further probing for the access tracks to BP 5 and BP6 and look for suitable alternatives which would demonstrate a lesser impact on areas of deepest peat (such as access via the business park to the south).
We would also highlight that excavations for all borrow pits should not encroach into the pockets of deeper peat along their borders. Suitable mitigation should be submitted to demonstrate a suitable buffer to ensure excavations do not cut into and indirectly drain deeper basins of peat adjacent to the borrow pits.

Location of Suds ponds:
1.4While we would like to see higher resolution peat surveys for each area of infrastructure, we would like to have seen Pond 1 (PD1) outwith the peat that is 3-4m deep. We therefore ask that this is relocated to the east into BA2. Further information should also be provided to understand whether this area would require excavation regardless of pond 1 being relocated, and clarification on how the deep areas of peat adjacent to the excavated areas will be managed during construction.
Options to reduce the requirement for borrow areas and translocation to Creed North:

1.5We note that Section 5.7.4 of the Outline Peat Management Plan states that "there may be further possibilities to reduce the footprint of laydowns through securing of additional land nearby to fulfil the same laydown functions". As avoidance is the first principle of the NPF4 mitigation hierarchy, as outlined in Policy 5 d), and options to use the excavated peat are limited, we would expect the need for excavation to be first avoided. We would therefore request this option is secured and the footprint of excavations reduced, and the site plans and volumes of peat amended to reflect this. We would like to see Laydown Area 3 removed to avoid impacts on peat depths of 3-4m.
1.6For clarity on the options presented, while we would be supportive of sections 5.7.1 (increasing capacity of Creed North) and 5.7.2 (identifying additional sites), we would not be supportive of proposals in Section 5.7.3 (construction of elevated peat cells) or 5.7.6 (constructing elevated bunds). Naturally occurring raised peat has developed over millenia in the right areas where conditions allow it. The chances of reinstatement success of artificially raised peat cells and bunds will likely be low.
1.7We note that it is proposed to over-deepen the borrow pits to accommodate more peat to a total depth of 3m. It is not clear if the rock from the borrow pits is required, or if the borrow pits are being excavated to allow for excavated peat use. It should be clarified what will be done with the excavated rock and where it will be utilised.
1.8The option for best excavated peat use is the one that will have the best chance of successful reinstatement. We would therefore encourage the applicant to discuss the proposals with NatureScot to determine what restoration techniques might result in the best outcomes.
Reinstatement methods for borrow pits:
1.9Plate 5.1 (Indicative profiles) show a rock berm and rock tracks that will protrude slightly above the ground being used to hold the peat. We have some concerns about the hydrological connectivity, but we note that Plate 5.1says that the track caps will be lower density to enable throughflow of water from one cell to another. However, in other cases with borrow pit reinstatement we've seen that the cell walls are holding the catotelmic peat, and the more fibrous acrotelm and turves are placed on top of these walls so the surface layer is continuous. We would therefore request further information is provided to justify the end design and the finish of the target habitat. We would question whether removing the top layer of the rock tracks and berm on retreat would not produce a more natural and more hydrologically connected habitat.
Screening bund:
1.10 We note that laydown 3 will be re-purposed to accommodate a large earthworks screening bund. From photomontages it appears that this will be planted with trees. The trees will add biodiversity to this area between infrastructure and restored land. We can see there are trees following the burns on the satellite images, but it is not clear if these are native trees or not. Bog woodland usually has widely spaced Scot's pine, birch or willow and the planting of the bund should ensure the species used are native and appropriate for peatland edge habitats.
1.11 We would require further information on what would happen to the basin of deep peat underneath the proposed bund should laydown area 3 be removed or repositioned.
2.Impacts on the water environment
2.1 We are aware that blue clay is a pollution risk on the islands. We request that further information is provided to clarify whether large quantities of clay will be excavated on site. The peat probe surveys also suggest there is silt in places below the peat and some note clay. We also note there is reference to reusing clay at the bottom of the restored borrow

areas in plate 5.1 and brief reference in section 5.2.1. We request further information on the quantities, storage and proposed use of the excavated clay, as this could pose a risk to the water environment.
2.2 Following discussions at a meeting with the applicant on the 31st October 2024, it was noted that the watercourse to the north of the site is more like an agricultural drain, while the south watercourse becomes more naturalised. We also noted that multiple borrow pits, and areas associated with the main platforms, are within close proximity of the watercourses. We will require site specific mitigation measures for all excavations within 10m of the watercourse. We would request clarification as to how close the southern boundary of the platforms are to the watercourse to the south and clarification on how many metres more of excavation will be required beyond the shown footprint of the proposed platform.
3. Private water supplies
3.1We previously raised concerns regarding a private water supply approximately 250 m northeast of the site. Section 9.5.13 of the EIAR states that the site is determined to not be in hydrological or hydrogeological connection with the private water supply identified, and we therefore have no further comments on this.
4. Other planning matters
4.1 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/
Advice for the applicant
5. Regulatory advice
5.1 While numerous options still exist for the excavated peat, the applicant should be aware that excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. Unless the waste 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. Further guidance on this may be found in the document Is it waste - Understanding the definition of waste. If there are any proposals to make use of excavated peat that do not meet the above requirements the developer should contact SEPA's waste permitting team via wastepermitting@sepa.org.uk to discuss potential regulatory controls of use of excavated peat.
5.2 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.

advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our website planning pages - www.sepa.org.uk/environment/land/planning/

CONSULTEE **Historic Environment Scotland**
Consultee Response

CONSULTEE Scottish Water
Consultee Response
Audit of Proposal
Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:
Drinking Water Protected Areas
A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.
Asset Impact Assessment
Scottish Water records indicate that there is live infrastructure in the proximity of your development area that may impact on existing Scottish Water assets.
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.
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.
Written permission must be obtained before any works are started within the area of our apparatus
Surface Water
For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.
There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.
In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and-Developers/Connecting-to-Our-Network which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.
Next Steps:
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

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.

CONSULTEE **North Lochs Community Council**

Consultee Response

The site area of 25/00061/PPPM falls within the boundary of North Lochs Community Council and we, as a statutory consultee, would like to make the following comments on the application:

Road Safety

1.We are disappointed to find there is no proposal for an extension to the cycle lane on the A859 and associated road upgrade (or any form of community benefit) in 25/00061/PPPM, although this was discussed with NLCC and noted in their Pre-Application with Communities Report that accompanies the planning application.

When we contacted SSEN for clarity on this they responded with the following statement from the Environmental and Consents Manager:

"Construction traffic from the development has the potential to impact on the road network. Potential effects and appropriate mitigation measures are set out in the traffic and transport chapter of the environmental impact assessment. Subject to receiving consent for the development, a full Construction Traffic Management Plan will be prepared and submitted to CnES for approval, ahead of construction starting at the site.

For clarity, we are not currently proposing any upgrade to the existing cycle lane as part of this development, as we believe impacts on road users can be mitigated in line with the recommendations of the environmental impact assessment.

However, we have noted your Scoping Response, your concerns over the impact of construction traffic on cyclists on the local road network, and your request that the cycle lane be extended. We are also mindful that other SSEN Transmission projects are in development in this part of Lewis, which may result in future impacts on the road network. We have therefore separately commissioned a cycle lane feasibility study with Ramboll Group. The results of this study are not yet available, but once this is complete, we will communicate key findings to you."

2.We would like to reiterate the points NLCC have made previously in emails to Comhairle Planning and the Roads department regarding the need for an extension of the cycle lane to accommodate the wider Western Isles Transmission Project. In summary these are:

In 2021 the Comhairle commissioned the construction of a 0.9km (1/2 mile) cycle refuge lane on the northbound section of the A859 Lochs Road between the B897 Grimshader Junction and the entrance to the Creed Park Industrial Estate. This lane has been successful in providing a safer route for north-bound cyclists to negotiate the blind bends and summits on this heavily trafficked section of road but at less than 0.6 miles it stops short of a stretch of Road where there are serious safety issues for cyclists and where SSEN Lewis Hub is proposed to be sited.

The SSEN site will be located on a double lined stretch of the A859 on the rise to a hidden dip where vehicles overtaking cyclists at speed occurs frequently. The proposal will increase the number of large and slow-moving vehicles crossing onto the A859 and exacerbate the already significant safety issues on this stretch of road.

The wider Western Isles Connection project will result in a significant increase in heavy goods vehicles entering/exiting the Arnish Road junction. The junction is on an incline and

traffic is fast moving on this double lined approach to Stornoway. Additionally, the forthcoming Stornoway Grid Support Point (GSP) upgrade, opposite the Arnish Junction, will bring additional disruption and vehicle movements.
An existing issue, but in close proximity to the site, is the difficulty cyclists currently have in rejoining the main carriageway on the A859 where the current cycle lane ends midway onto a fast-moving road.
3.We do not believe it is accurate for SSEN to suggest that the only impact on the road network will be 'construction traffic' when it is roundly acknowledged that a HDVC station of this size will bring significant cumulative impacts as associated wind energy sub-stations and battery storage facilities co-locate to be in close proximity (with a number likely to be within the site area of the current application). Additional to this, the forthcoming Stornoway Grid Support Point (GSP) upgrade, development of Stornoway Wind Farm and overhead line upgrade programme, will bring additional disruption and cumulative impact on the A859.
4.We would like to request that Comhairle nan Eilean Siar negotiates that Scottish and Southern Electricity Networks (SSEN) include a cycle lane extension, and any necessary road upgrades, on the A859 as part of a developer contribution agreement for their current HDVC 25/00061/PPPM application and forthcoming Stornoway Grid Support Point (GSP) upgrade (which falls within the boundary of the North Lochs Community Council).
The Comhairle's Outer Hebrides Local Development Plan (2018) Policy EI 12: Developer Contributions states that:
"The Comhairle may negotiate with developers a fair and reasonable contribution towards infrastructure and/or services required as a consequence of the proposed development. The contributions will be proportionate to the scale and nature of the development (including cumulative) and will be addressed through planning conditions or through a legal agreement if appropriate."
We acknowledge these developments will bring substantial investment into the islands but we feel this should not be at the expense of the safety of our community. The A859 is a vital route for both local residents and visitors and it is imperative that this development does not compromise safety and increase the risk of serious accidents. We feel the extension of a dedicated cycle lane on this stretch of road would significantly enhance safety for road users and cyclists.
Below are some of the visualisations provided in previous correspondence with the Comhairle regarding this issue:

SSEN Site Access on A859 (north bound)

SSEN Site Access on A859 (north bound)

SSEN Site Access on A859 (south bound)

Existing Cycle Refuge Lane on A859 (north bound)

ADDITIONAL COMMENTS
5.We made a number of additional comments in our response to the Scoping Opinion Response 24/00325/SCO that we would like to bring to the attention of Comhairle for consideration in their assessment of the planning application.

Assessments for 'Cumulative Impact' should include all proposed and consented electricity generating stations in the wider area e.g. Stornoway Wind Farm, Grimshader WindFarm, Beinn Ghrideag Wind Farm, Stornoway GSP upgrade etc.
The neolithic stone circle Druim Dubh on the A859 should be included in the assessment of local heritage resources.
We would like to see consideration of impacts on human health included in the EIA, such as: moor fire risk, emissions, EMF, major accidents, noise and lighting, lightning strikes, peat slides etc.
A section of the A859 immediately south of the proposed site entrance is prone to flash flooding and cars regularly aquaplane off the road when this happens as they are generally travelling at speed along this section. A number of drains and streams that contribute to this issue cross the proposed SSEN site area. We would hope that the impacts of the proposed development on this issue are fully assessed in the EIA and that any subsequent proposal improves or enhances the drainage of this section of the A859.
We would welcome consideration of impacts on leisure and learning users in the area, particularly:
Angling Interests on the Creed River;
Equestrian users of the Lochside Arena;
Karting and Motocross Circuit at Lewis Karting Centre;
Macaulay College students and staff;
Walkers on the Hebridean Way.
In summary we consider the most important issues for our communities will be:
Impacts on Road Safety, Traffic Management and Active Travel Routes
Impacts on Flooding on the A859 (watercourse runs across development site)
Impacts on Human Health (including moor fire risk, lightning strikes, peat slide, emissions etc) Impacts on Leisure, Learning, Tourism and Recreation
Impacts on Cultural Heritage Assets (including cumulative impact)
Cumulative Impact (for all topics) should include all proposed and consented electricity generating stations in the wider area (e.g. Stornoway Wind Farm, Grimshader WindFarm, Beinn Ghrideag Wind Farm, SSE Depot etc).

CONSULTEE **Stornoway Community Council**
Consultee Response
See DMS/Teams for Response - Previous responses superseded

CONSULTEE **Highlands And Islands Airports**
Consultee Response
There is insufficient information regarding the location (co-ordinates) of the following structures on the proposed site:

HVDC building
132kv & 400kv Substation

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.

UPDATED Response: 02.05.2025

The development has been assessed using the criteria sent by the Assistant Civil Project Engineer (document reference: LT14 – Lewis – HIAL Data 002).

With reference to the above proposal, our preliminary assessment shows that, at the given position and height, this development would not infringe the safeguarding criteria and operation of Stornoway Airport.

Therefore, Highlands and Islands Airports Limited has no objections to the proposal.

Any variation of the parameters (which include the location, dimensions, form, and finishing materials) then as a statutory consultee HIAL requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

CONSULTEE **Ministry Of Defence**
Consultee Response
Thank you for consulting the Ministry of Defence (MOD) on application reference 25/00061/PPPM.

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

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

The MOD must emphasise that this email is provided specifically in response to the application documents and supporting information provided via email on 13 March 2025 by Comhairle nan Eilean Siar.

Amendments to any element of the proposed development (including the location, dimensions, form, and/or finishing materials of any structure) may significantly alter how the development relates to MOD safeguarding requirements and may result in detrimental impact(s) on the operation or capability of Defence sites or assets.

In the event that any:
O revised plans;
o amended plans;
o additional information; or
o further application(s)

are submitted for approval, the MOD, as a statutory consultee, should be consulted and provided with adequate time to carry out assessments and provide a formal response whether the proposed amendments are considered material or not by the determining authority.

CONSULTEE **Met Office**
Consultee Response
Thanks for consulting the Met Office regarding the above proposal. We have no concerns.

CONSULTEE **National Air Traffic Services Ltd**
Consultee Response
NATS has concerns that unmitigated the proposed developer has the potential to degrade the performance of the Sandwick Radar system located on the other side of Stornoway.

The risk would be that elements of the proposed development would reflect sufficient energy to become the source of false detections, however this will depend on the final layout and scale of the buildings within the development. It is likely that should a reflection risk be identified that this could be mitigated via adaptation of the radar's processing algorithms.

At this time NATS would like our concerns noted and request that aviation be considered as a factor in subsequent phases of the planning process.

CONSULTEE Fire Scotland
Consultee Response

CONSULTEE **SSEN Transmisison Planning and Land Enquiries**
Consultee Response
Thanks for contacting us.

This consultation is for one of our own projects, so I have no comments on behalf of SHET Transmission Asset Management.

I have cc'd our Land Team, Transmission.ple@sse.com you can include them in any further planning consultations.

CONSULTEE **Scottish And Southern Electricity Networks**
Consultee Response

CONSULTEE **Sty Port Auth Harbour Master**
Consultee Response

CONSULTEE **Development Planning**

Consultee Response

See IDOX for Response (Sensitive)

CONSULTEE **Roads, Bridges and Streetlighting**
Consultee Response
The EIA Report has taken in to account the effects of the projected traffic associated with the project.

The Outline Construction Traffic Management Plan identifies guidelines to manage the effects of the construction traffic. This includes the appointment of a Site Liaison Officer to deal with various elements of traffic and transportation during the construction phase. An updated Construction Traffic Management Plan (CTMP) should be agreed with CnES prior to construction.

The section on Road Condition (12.1.6.5) in the Outline CTMP states that prior to the works starting condition surveys will be carried out on the relevant roads and monitored throughout the construction phase of the project. Any damages relating to the construction works on the road network will be identified and repaired by the developer.

The list of major projects considered as part of the cumulative assessment should include Uisenis Wind Farm, the Balallan Switching Station and the Tolsta Wind Farm. Traffic associated with these projects will use the A859 and the Arnish Road.
The impact of construction traffic on this section road will affect road users such as cyclists. The developer should consider the proposal from North Lochs Community Council to extend the existing cycle lane.

The Abnormal Load Route Access Study provides information on route options, assessments and swept path analysis. Any bridges or structures crossed as part of the Abnormal Load Route should be assessed by the developer beforehand with mitigation works carried out where required.

The site will be accessed from both the A859 and the upgraded Arnish road. Both accesses should be constructed as shown on the submitted access details.
A suitably sized culvert should be installed where the access crosses a roadside drain.
It is the responsibility of the developer to prevent surface water flowing from the site on to the main road or vice versa.

CONSULTEE **Comhairle Archaeologist** (Date Consulted - 13 Mar 2025)

Consultee Response
Thank you for consulting the Comhairle Archaeology Service. The subject of Cultural Heritage is considered in Chapter 6 of the Environmental Impact Assessment Report (vol.2). The chapter identifies historic environment assets within an outer and an inner study area. It considers the potential effects on these assets by the development, during the construction, operational and post construction phases of the development. These effects are further divided into direct, indirect (including setting) and cumulative impacts on the historic environment. The report identifies the range of known cultural heritage assets, both designated and undesignated and considers the potential for unknown buried archaeological

structures, deposits and palaeoenvironmental remains. The significance of the historic environment assets has been assessed through consideration of their archaeological or architectural value, against their sensitivity and the magnitude of impact they would experience from the development.

Relevant Policy and Guidance

Guidance set out in the National Planning Framework 4, PAN2/11 and the Historic Environment Policy for Scotland (HEPS.2019) note that where significant archaeological remains, whether scheduled or not, are affected by a proposed development, there should a presumption in favour of their physical preservation in-situ, and a presumption against proposals which would involve significant alteration or cause damage, or which would have significant effect on the setting of visible remains. Whilst the preservation of in-situ remains is preferred, it may be possible to mitigate impacts to archaeological assets via programs of archaeological works, such as excavation and / or monitoring. These programs of works enable the preservation by record of archaeological deposits that will be impacted by development. Regional planning guidance concerning cultural heritage is reflected in policies contained in the Comhairle nan Eilean Siar's Local Development Plan (2018).

Potential for Unknown Cultural Heritage Assets.

A large area of the proposed development zone comprises of blanket bog of varying depths (Vol.4 Technical Appendix 10.1). Section 6.4.17 identifies the potential for unknown archaeological remains to be present buried within or below the peat deposits. Furthermore, it notes the opportunity to recover valuable palaeoenvironmental data from deeper areas of the peat.

Potential Effects.

Section 6.5 sets out the potential effects, both direct (construction) and indirect (operational) from the development on any archaeological / architectural remains

The main construction works with potential direct impacts to the cultural heritage resource include;

Site stripping and other ground works
Access tracks
Temporary laydown areas
Borrow pits
Heavy plant movement
Drainage and hydrological changes
Accidental damage to cultural heritage assets

The main operational impacts with potential for indirect impacts to the cultural heritage resource include;

Adverse effects on the setting of cultural heritage assets

The Archaeology Service notes several observations in relation to operational effects on Druim Dubh Stone Circle(6.5.18), Cnoc na Croich Chambered Cairn (6.5.24) and Stornoway War Memorial (6.5.41). While it is not conclusive; it is reasonable to assume some visual association between the stone circle and the (once) prominent burial cairn, these would have been notable features in a wider prehistoric landscape. The photomontage (figure 6.3) would appear to show that the visual association of these monument would be obstructed by the development (6.5.21).
With regard to section 6.5.43, it is the understanding of the Archaeology Service that the War Memorial was located in its prominent position, not only because Stornoway was the port of embarkation, but also to associate it with the four parishes of the Isle of Lewis (all of which can be seen from the tower). The plaques with the names of all the service personnel who did not return, were originally mounted inside the tower. The key views from this monument will include the vistas towards the South, West, and North and not just Stornoway and the bay.

Mitigation

The mitigation strategies presented in section 6.6 will occur prior to or during the construction phase of the project. It will be managed by an Archaeological Clerk of Works (ACoW) for the duration of the project.
The ACoW will implement all aspects of the recommended mitigation.
These measures comprise of,

- Demarcation of identified archaeological sites that will remain in situ,
- Toolbox talk for contractors and subcontractors
- Evaluation trenching on all groundbreaking where environmental conditions allow
- Program of core sampling in peat areas where trial trenching is not feasible

It is important that the Comhairle Archaeology Service and the ACoW agree a project design for these measures.

Information gained from the program of trial trenching and coring will further inform any strategies that may be implemented should buried archaeological remains be encountered. A mitigation strategy can be discussed only once the results of the survey are available to be considered. In the event that significant archaeological remains are identified, other appropriate works such as archaeological monitoring, preservation in situ, to full excavation, post excavation analysis and publication may be included in the program of archaeological works. Demarcation of identified known archaeological sites should be clearly and robustly marked by the ACoW. Should this methodology prove to be ineffective (for example due to environmental conditions), the sites should be temporarily fenced off with a 10m buffer zone for the duration of the construction period.

The Archaeology Service recommends that a program of archaeological works is applied to this application to mitigate potential impacts from the development on the historic environment resource. These should take the form of 8-10% evaluation trenching in all areas of ground disturbance, coring strategy to enable full palaeoenvironmental analysis, appropriate demarcation of insitu heritage assets and with the proviso of further potential mitigation such as archaeological watching briefs and full excavation.
Additionally, the Archaeology Service will require access to the site prior to and during the construction phase of the project.

Please can you attach the following conditions to this application?.

Condition: (Evaluation)
No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme for the archaeological investigation of the development site, this shall be submitted for approval by the Comhairle as planning authority. Such scheme shall indicate the following:
a) Appointment of Archaeological Clerk of Works
b) The extent, character and significance of any archaeological or palaeoenvironmental remains within the site, will be identified and evaluated;
c) Any archaeological remains would be preserved in situ or, where their preservation in situ cannot be achieved, how they would be investigated, recorded and recovered and the findings published ;
d) Access to the development site to enable archaeological works and investigation recording and recovery of finds would be achieved; and
e) Notification of the commencement of development and access by an archaeologist to the site would be given.
No part of the development to which this planning permission relates shall commence until the Comhairle as planning authority has issued, in writing, its approval of the scheme; any consequential programme of archaeological works to be undertaken; and terms for the submission of a Data Structure Report that includes an assessment of the impact of the development on the archaeological remains.
This scheme and programme (or any subsequent variation to it that may be agreed in writing by the Comhairle as planning authority) shall then be implemented to the satisfaction of the Comhairle as planning authority.

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

Condition: (Fencing)
Details of the type and siting of protective fence(s) required to be erected around the identified features (Caunters Original Chemical Works Building, site number 4.1 & The Arnish Sheilings, site number 1) shall be submitted for approval by the Comhairle as planning authority. No part of the development to which this planning permission relates shall commence until the Comhairle as planning authority has issued its approval of the details in writing and the approved fence(s) have been erected. Such fence(s) shall be retained throughout the period of construction and shall not be removed until agreed in writing by the Comhairle as planning authority. Throughout the period of construction, no structures shall be erected, or operations carried out within, such fence(s).

Reason:
In order to secure the protection of this archaeological feature.

Condition: (Watching Brief)
A method statement for enabling an archaeological watching brief on all groundbreakings shall be submitted to and approved by the Comhairle as planning authority . Such method statement shall include:

a) identification of the organisation or person(s) that would be employed to undertake the watching brief (including their archaeological qualifications);
b) provisions to be made to allow access to the development site and to enable investigation recording and recovery of finds; and
c) terms for notification of the commencement of development and access arrangements to the site.
No part of the development to which this planning permission relates shall commence until the method statement has been approved in writing by the Comhairle as planning authority. The approved method statement (or any subsequent variation to it that may be agreed in writing by the Comhairle as planning authority) shall then be implemented to the satisfaction of the Comhairle as planning authority throughout the period of all groundbreaking works.

Reason:
In order to ensure proper recording and protection of items of archaeological interest.

Condition: (Access)
During the period of operations to which this planning permission relates, the operator must inform the Comhairle Archaeologist 14 days prior to commencement of works. The operator shall also afford access, at all reasonable times, to any archaeologist nominated by the Comhairle as planning authority and shall allow such archaeologist to observe work in progress and record items of interest and finds.
These conditions enable the maintenance of the archaeological record in the Western Isles.

Reason:
In order to ensure proper recording and protection of items of archaeological interest.

CONSULTEE **Environmental Health**
Consultee Response

CONSULTEE **Emergency Planning**
Consultee Response

CONSULTEE **Outer Hebrides Fisheries Trust**
Consultee Response
It is disappointing given the initial pollution caused during the site selection process that SSE have scoped out migratory fish. Section 3.5 of the EIA makes no reference to the pollution cause at Site 6 (Creed North) which was reported in the press at the time https://www.stornowaygazette.co.uk/business/ssen-are-advised-to-think-again-on-site-4473832.

The EIA clearly identifies connectivity between the site and the River Creed and states "The River Creed is situated approximately 100 m northeast of the Proposed Development area at its nearest point. Engineered drains are present within and around the Site, which discharge surface water into the River Creed watercourse, one of which crosses the Site and discharges to the north". The report goes onto say that although there is potential for pollution it's predicted to be unlikely even though there is clear evidence of the developer having caused pollution in December 2023.

The Scoping report 6.4 identifies sensitive receptors including the River Creed/fish species. Furthermore, OHFT have told SSE that there are vulnerable receptors (Atlantic Salmon) in the river Creed and spawning grounds. Therefore, the General Environmental Management Plan (GEMP) should include other relevant legislation under section 3. Because SSE are aware of spawning grounds and the presence of Atlantic Salmon the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 applies.

CONSULTEE **Flood Risk - Stornoway**
(**Consultee Response**

CONSULTEE **Harbour Master**

Consultee Response

CONSULTEE **Build Stand - Melbos/Branahuie Marybank Point/Lochs/Harris**

Consultee Response
I would make the following comments for Environmental requirements based on the Scottish Building Standards guidance document:-

- All surface water drainage should be designed and constructed in line with the requirements of the CIRIA document C753 'The SUDS Manual' 2015
- Any wastewater drainage should be designed and constructed in line with Section 3.7 and 3.8 of the Scottish Building Standards guidance documents. Any Private Wastewater drainage systems to be registered with SEPA.

CONSULTEE **Murdo Mackay**
Consultee Response

CONSULTEE **Economic Development - Energy**
Consultee Response

CONSULTEE **Joint Radio Company**
Consultee Response
JRC is currently undertaking a mitigation report for SSE to identify potential mitigation solutions, which we have not yet completed. Therefore JRC must continue to OBJECT to the proposed development until the report has been completed and, if identified, we have agreed with SSE on a suitable mitigation solution.

Further details on the impacted links:
JRC analyses proposals for wind energy developments on behalf of the UK Energy Industry. We assess the potential of such developments to interfere with radio systems operated by UK and Irish Energy Industry companies in support of their regulatory operational requirements.

The Energy Industry considers that any wind energy development within:
* 1000m of a link operating below 1GHz; or
* 500m of a link operating above 1GHz, requires detailed coordination.

For turbines with a blade diameter of 32m or less this distance is reduced to:
* 500m for links below 1GHz; and
* 300m for links above 1GHz before a detailed coordination is required.

There is an EXCLUSION ZONE around most Base Station sites of 500m, i.e. no development is permitted. This will be evaluated on a case by case basis for smaller turbines.

Unfortunately, part (or all) of the proposed development breaches one or more of these limits.

The affected links are:

460MHz Telemetry and Telecontrol:
JESHAKS1 - JESHAKO03

>1GHz Microwave Point to Point:
0929285/1

Operated by: SSE

Unfortunately, since these links form part of our critical national infrastructure, no details apart from the link identifiers can now be supplied, due to previous breaches in confidentiality.
However, JRC are still willing to work with developers in order to clear as many turbines as possible, including those that may initially fall within the coordination zone. For more information about what to do next, please contact us using the link at the bottom of this email.

The JRC objection shall be withdrawn after simple analysis shows no issues; when a satisfactory coordination has been achieved and the zone of protection is implemented; or when an appropriate mitigation agreement is in place.

CONSULTEE **OFCOM - Spectrum Licensing**
Consultee Response

CONSULTEE **Wind Turbine - TV And Radio Transmission Links – Arqiva**

Consultee Response

Response by Arqiva

We refer to the above planning application and thank you for the opportunity to comment.

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

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

If you would like to discuss this

CONSULTEE **Crofting Commission**

Consultee Response