24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request and
24/00191/MLCON - Marine Licence consultation Scoping Request (new quay capable of taking heavy loads, reclamation area, dredging).

Date	Consultee	Response
22/05/2024	NATS	NATS are pleased to note the statement that aviation is to be scoped in to the upcoming consultation process. Sandwick is an important radio and surveillance site for managing en-route air-traffic off the ocean and throughout the west coast. We have concerns regarding its integrity once we start seeing 300m+ turbines siting only a few hundred metres to the south. We look forward to working with the developer to be better understand and manage these concerns as more detail becomes available.
23/05/2024	MET Office	Thank you for requesting feedback from the Met Office on the above proposal, which is approximately 12.1 km from our weather radar at Drium-A-Starraig (located at NGR: 154460 932393). A key requirement for the weather radar is to provide advance warning of severe weather and real-time information which is vital to the continued operation of military and civilian aviation as well as to forecasters as part of the UK Weather Radar Network, including input to flood forecasting. As such the Met Office is a Category 2 Responder. Wind turbines have been shown to have detrimental effects on the performance of Met Office weather radars and the accuracy of the products and services derived from the data. These effects include the creation of false 'clutter' returns and such effects can imitate or obscure real precipitation signals. I have reviewed the Scoping Report and have concerns about the proposed pre-commissioning of offshore wind turbines. There is potential that turbines would be in the beam of the radar at Drium-A-Starraig and may create false clutter returns. Therefore, the Met Office confirms that we expect to be included in a suitable assessment to fully consider the potential effects from the proposed development on the Met Office weather radar at Drium-A-Starraig. We expect the assessment to outline the frequency and duration of pre-commissioning of offshore wind turbines, including the anticipated rate of rotation of the turbine blades.
24/05/2024	Scottish Water	<u>Audit of Proposal</u> Scottish Water has no objection to this planning application; however, the applicant should beaware that this does not confirm that the proposed development can currently be serviced. Please read the following carefully as there may be further action required. Scottish Water would advise the following: <u>Drinking Water Protected Areas</u> A review of our records indicates that there are no Scottish Water drinking water catchmentsor water abstraction sources, which are designated as Drinking Water Protected Areas underthe Water Framework Directive, in the area that may be affected by the proposed activity.

		Surface Water For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combinedsewer 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 customertaking account of various factors including legal, physical, and technical challenges. In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunitywith strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflectsthe best option from environmental and customer perspectives. General notes: • Scottish Water asset plans can be obtained from our appointed asset plan providers: • Site Investigation Services (UK) Ltd Tel: 0333 123 1223 • Email: sw@sisplan.co.uk • www.sisplan.co.uk I trust the above is acceptable however if you require any further information regarding thismatter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.
28/05/2024	SGN	I have reviewed the EIA Scoping Report and wish to provide the following comments. SGN's Stornoway LPG plant provides a gas supply to approximately 1700 homes and businesses. The LPG supply at the plant requires regular replenishment via road tanker to maintain security of supply. It is critical that freight disruptions do not impact on SGN deliveries to site and the proposed project will need to consider security of gas supply and prioritise freight/tanker deliveries with minimal disruption before, during and after construction.

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

		Land based elements We request that the issues covered in Appendix 1 below, be addressed to our satisfaction in the EIA process. This provides details on our information requirements and the form in which they must be submitted. We have also provided site specific comments in the following section which provides pre-application advice and can help the developer focus the scope of the assessment. Peat and peatland We note that Onshore Ground Investigation followed by two rounds of peat investigations have been undertaken and a large proportion of the site is on peat. As there are deep peat pockets present on site (between 1m and 1.5m), we will expect the application to be supported by a comprehensive site specific Peat Management Plan. Please refer to the attached Appendix 1, paragraph 4.6 for more details regarding all requirements. As it appears that much of the site is likely to be peatland, we suggest a National Vegetation Classification (NVC) survey is undertaken without carrying out Phase 1. For further information on assessments please refer to SEPA Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems, in particular sections 2.10 to 2.14. NatureScot also provides useful information on NVC survey method and mapping requirements. 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. We support use of local materials where available and implementation of waste hierarchy during construction works. We hope this will be included in the final EIA document. Other planning matters 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/.

		Regulatory advice for the applicant 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. **Appendix 1: Detailed scoping requirements** 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 appendix sets out our minimum information requirements and we 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. **1. Site layout** 1. Each of the drawings requested below must detail all proposed temporary and permanent infrastructure. This includes all roads, excavations, buildings, laydown areas, storage areas and any other built elements. All drawings must be based on an adequate scale with which to assess the information. 2. The layout should be designed to minimise the extent of new works on previously undisturbed ground. 3. A comparison of the environmental effects of alternative locations of infrastructure elements may be required. **2. Water environment** 1. 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. 2. The submission must include a set of drawings showing: a. All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.

		b. 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. c. 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. 3. 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. **3. Flood risk** 1. 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. 2. 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. 3. 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. **4. Peat and peatland** 1. 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. 2. 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. 3. 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. b. peat depth survey showing interpolated peat depths. c. peatland condition mapping – the Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category. 4. 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. 5. 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 roads. 6. 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. b. 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). c. 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. d. 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. e. 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. **5. GWDTE and existing groundwater abstractions** 1. 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. 2. 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. b. 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. 3. 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.
31/05/2024	Economic Development	Having looked at the scoping report, the areas of economic development are covered in the report as one would expect and appear to be well presented. No concerns on the scoping report as presented.
04/06/2024	Roads	Parking for the development should be based on the standards set out in the Outer Hebrides Local Development Plan.

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request and
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		The Scoping Report states the projected transport figures suggest that both the junctions and the routes on the existing network will operate within their capacity. The document also recognises that certain roads will be affected by a marked increase in the volume and frequency of HGV's on both the construction and operational phase of the development. An updated TA will be scoped in to the EIAR which will be used to develop a Construction Traffic Management Plan. This should be submitted before works commence on the development. There may be restrictions on HGV movements around schools at specific times. The Report also states that the Operational Phase of the development will be scoped out of the report on the basis of the Potential Operational Impacts 24.4 The proposed improvement to the Arnish Road will lessen the effect of the operational impact.
06/06/2024	Archaeology	The Archaeology Service notes the inclusion of Section 19: Archaeology and Cultural Heritage within the EIA Scoping document. Appropriate legislation and guidelines have been acknowledged and this section discusses both terrestrial and marine historic environment assets and considers the potential impact / effects on these features, during the construction and post construction phases of the development. Additionally, the potential for unknown archaeological remains and palaeo-environmental deposits are also considered. The document makes reference to the findings of both the terrestrial and marine archaeological program of works carried out for the Deep Water Port (DWP) project; however, it should be noted that the CnES Archaeology Service has not received copies of either the marine archaeological survey or the terrestrial watching brief reports. Due to this lack of information the Archaeology Service is unable to comment in detail. It is recommended that copies of these reports are sent to the Archaeology Service prior to submission of the EIAR. This section also identifies potential operational impacts from aspects of the development on the setting of historic assets and assessment it proposed. It is recommended that visual impact assessment is expanded beyond the proposed 5km buffer to enabled appropriate assessment regarding the floating wind turbine impacts. This could be approached using an inner study area and then increasing 5km buffers. The document proposes appropriate mitigation covering pre-construction and construction phases of the development, including review of previous geophysical survey data carried out for DWP, watching briefs and Protocol for Archaeological Discoveries. This data will further inform the marine planning consent aspect of this development as set out in Scotland's National Marine Plan 2015. With regard to 3.3.1 Construction Methods, it is noted that rock blasting, vibration and impact drilling are some of the construction techniques likely to be implemented. The Archaeology Service would take this opportunity to highlight potential negative impact to the island dun in Loch Arnish, through shock waves or vibration. Recent studies have

		identified this site as a stone and possibly timber constructed crannog. Loch Arnish Dun (MWE4316) is also a scheduled monument (SM 5397). It is recommended that early discussion is entered into with Historic Environment Scotland to discuss this potential issue.
14 June 2024	HES	There are several onshore designated heritage assets within the vicinity of the development site, such as Lews Castle (LB18677), its associated GDL (GDL00263) and a number of scheduled monuments, such as Arnish Point, gun emplacements (SM5347), Loch Arnish,dun (SM5397), Cnoc na Croich, chambered cairn (SM6550), Druim Dubh,stone circle (SM5504) & Rubha Shilldinish, promontory fort and homestead (SM5253). The impact on the setting of these assets would derive from the storage of offshore turbines at the site rather than from the physical components of the quay itself. However, there is not yet sufficient clarity regarding the visual impacts of this temporary infrastructure, and there may be scope within the proposed options to mitigate setting impacts on our interests. We would expect these issues to be explored further as the scheme is developed, with the use of photomontages where adverse impacts are predicted. We would welcome further engagement with the applicant regarding setting impacts on onshore assets as the proposals progress. Further information regarding the setting assessment is provided in the annex below. The EIA assessment for the proposals should be undertaken by a suitably experienced heritage professional with an understanding of marine issues. The assessment should meet the requirements of National Planning Framework 4 (2023), the Historic Environment Policy for Scotland (HEPS, 2019) and associated Managing Change Guidance Notes. Additional guidance can also be found in the Cultural Heritage Appendix to the EIA Handbook (SNH, HES, 2018). Further information Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at https://www.engineshed.scot/.
10/06/24	HIAL	HIAL have assessed the proposed development and would require the developer to apply for a crane permit. This can be accessed online at our website: Safeguarding at our airports – Cranes - Highlands and Islands Airports Limited (hial.co.uk) We have no objections to the other proposed development areas.

24/00185/HROSCO - Deepwater South, Stornoway Harbour Revision Order Scoping Request and
24/00191/MLCON - Marine Licence consultation Scoping Request (new quay capable of taking heavy loads, reclamation area, dredging).

05/06/24	MOD	Thank you for consulting the MOD on the scoping request for Deep Water South, Stornoway. Apologies for the late response. Having studied the documentation submitted for this scoping request the MOD have the following observations, •As noted in the report the development involves alterations below the MHWS line for which a marine licence would be required. Page 127 notes that the MOD use the port facilities. Additionally, the offshore site falls within MOD Practice and Exercise Areas (PEXA) X5820 & X5815. Whilst this was assessed for the previously approved Deep Water Port with no concerns, this would be assessed again when a Marine Licence application is submitted. •As noted in the report (page 131), the site falls within Low Flying Area 14 into which the introduction of tall narrow structures have the potential to introduce hazards to low flying military aircraft. •As noted in the report (page 131/2), the introduction of tall narrow structures (crane up to 250m and turbines up to 330m ASL). "The wind turbine at the quayside will not be operational, however, during pre-commissioning activities, low-speed controlled movement of the blades for short periods is anticipated. Potential impacts associated with wind turbine construction and pre-commissioning are as follows: •Physical presence of tall structures giving rise to a collision risk; •Unwanted radar returns; and •Unwanted communication, navigation and surveillance (CNS) returns". The moving blades have the potential to impact on MOD assets which would require assessment. The MOD look forward to being consulted at future stages of this application.
04/06/24	Dev plans	**Use of Planning Policy** In para 4.2.4 of the Scoping Report Planning Policies, it states "As the updated OHLDP is unlikely to be updated in the Marne Licence and Harbour Revision Order submission timelines, it is proposed that the focus is put on considering policies laid out in NPF4" It should be noted that NPF4 and the adopted Outer Hebrides Local Development Plan (2018) (OHLDP) forms the Development Plan and both documents should be considered. It is only where there is any incompatibility between the provisions of both documents that the most recently adopted document (NPF4) takes precedence. The Scoping Report should be updated to correct this inaccurate statement.

General

The site is identified within the Stornoway Port Authority's (SPA) Materplan as phase 2 of the Deep Water Port development. The Masterplan aims to grow and develop the port area while contributing to the socio-economic prosperity of Stornoway and the islands. The OHLDP endorses the Stornoway Port Masterplan and recognises it as an important opportunity to increase economic activity in the islands and in the case of Arnish, support key major ambition for the islands to become a global player in renewable energy generation and manufacturing.

The fourth National Planning Framework (NPF4) identifies the development of site as a National Development – Energy Innovation Development on the Islands. Annex B of NPF4 provides further detail the relevant section is part e) of the Outer Hebrides. Annex C of NPF4 also addresses the Outer Hebrides Energy Hub plans with a deep water port which would support servicing the energy sector and large-scale off shore renewables, identifying Arnish in Stornoway for this purpose.

Regional Spatial Strategies (Indicative)

The Planning (Scotland) Act 2019, establishes a duty for a planning authority to prepare and adopt a regional spatial strategy. Regional Spatial Strategies (RSS) are long-term spatial strategies which specify the area/s to which they relate and identify: the need for strategic development; the outcomes to which strategic development will contribute; the priorities for the delivery of strategic development, and proposed locations, shown in the form of a map or diagram. The Scottish Government have stated that these (indicative at present) regional spatial strategies will continue to inform national priorities and that in turn NPF4 will support the delivery of regional priorities by identifying significant place-based opportunities for infrastructure planning to reflect and respond to. They expect an infrastructure-first approach to be embedded in the spatial strategies of local development plans. The Comhairle as planning authority has identified Arnish Deep Water Port and Energy Hub as a nominated 'national development' and included it as a priority project in its indicative Regional Spatial Strategy.

Islands Deal

One of the aims of the Islands Growth Deal is to create internationally significant new port infrastructure that will play an important role in supporting Scotland and the UK to achieve net zero targets. The proposal is part of the Outer Hebrides Energy Hub project which will establish the initial infrastructure to support onshore and offshore wind energy projects.

Policy Comment

The relevant policies from the Development Plan are:

NP4	**Outer Hebrides Local Development Plan**

Policy 1: Tackling the climate and nature crises	DS1: Development Strategy – Outwith Settlement but on a developed coast
Policy 2: Climate mitigation and adaptation	PD6: Compatibility of Neighbouring Uses
Policy 3: Biodiversity	ED1: Economic Development
Policy 4: Natural places	ED5: Minerals
Policy 5: Soils	EI 1: Flooding
Policy 7: Historic assets and places	EI 3: Water Environment
Policy 10: Coastal development	EI 4: Waste Management
Policy 11: Energy	EI 5: Soils
Policy 12: Zero waste	EI 8: Energy and Heat Resources
Policy 13: Sustainable transport	EI 11: Safeguarding
Policy 14: Design, quality and place	NBH1: Landscape
Policy 18: Infrastructure first	NBH2: Natural Heritage
Policy 22: Flood risk and water management	NBH4: Built Heritage
Policy 33: Minerals	NBH5: Archaeology
	STY3: Development of Stornoway Port Area

OHLDP Proposal Site 16 Arnish
The site is adjacent to and forms part of the LDP proposal site Economic Development: 16 Arnish, in the Outer Hebrides Local Development Plan (brownfield); this portion of the proposal site has been identified and safeguarded for Low Carbon/Renewables related development purposes. The existing use of Proposal Site 16 is a fabrication yard with other manufacturing and processing facilities. The core of the site is identified as the prime location for energy related development or other appropriate large scale uses that utilise its facilities and/or require a deep water harbour. There are a number of constraints attached to Proposal Site 16 (as outlined in the proposal site template) which may be of relevance to this proposal.

•CAA 17km Safeguarding Zone:
•Stornoway Airport, MOD Safeguarding Zone:
•Stornoway Airport; Druim A' Starraig above 45.7m,
•Stornoway Airport 3km notification,
•Stornoway Airport all developments,

		•Scheduled Ancient Monuments adjacent, •Listed building adjacent. •The site may be at risk of coastal flooding and therefore not all land within the allocation may be developable. Photographs & a topographic survey are required to demonstrate that all development will be above the 1in200 year flood level for the area which is 3.4 m AOD unless it is solely for water compatible uses or the location is essential for operational reasons. •A flood risk assessment may be required to ensure that the layout and design addresses and proposes measures to remove any risk from flooding. Advice from relevant safeguarding agencies should be sought. OHLDP STY3 Development of Stornoway Port Area The Harbour Revision Order is seeking to bring the site into the Harbour Limit but is within the identified developed coast. The policy ensures development within the extent of the Stornoway Harbour Limits or on the adjacent identified developed coast takes account of the Stornoway Port Masterplan and safeguards sites identified within it. The Plan recognises that the developments identified within the masterplan represent an important opportunity to increases economic activity in the islands and in the case of Arnish, the multiplier effects offer opportunities to support key major ambition for the islands to become a global player in renewable energy generation and manufacturing. The policy also requires that the National Marine Plan is taken into account. The Scoping Report has identified a number of policies within the National Marine Plan that are relevant to the proposal. It is understood that the National Marine Plan is under review and any updated Plan should be taken into account. **Development Strategy** The application site is classed as outwith the settlement. 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. Policy DS1 requires that all proposals in outwith the settlement require to be assessed again the capacity of the surrounding landscape to accommodate the development. There is also a requirement for all non residential uses on green field sites to demonstrate a justified need for the proposed Development in that location. Given the proposed use of the site, adjacent existing uses and the fact that the proposed development is identified as a National Development and is part of the Islands Growth Deal it is considered that suitable justification for the site has been provided. **Landscape**

		NPF4 Policy 11: Energy requires project design and mitigation demonstrate the following: significant landscape and visual impacts; impacts on the historic environment and cumulative impacts OHLDP Policy NBH1: Landscape states "Development proposals should not have an unacceptable significant landscape or visual impact. If it is assessed that there will be a significant landscape or visual impact, the applicant will be required to provide mitigation measures demonstrating how a satisfactory landscape and visual fit can be achieved." We acknowledge that while the DWS project during construction and operation (particularly with the height of the crane and turbines) could have a significant effect on the Stornoway Harbour coastal character (extraction of cliffs and moorland slopes), given the existing development context, this is not felt to be uncharacteristic within this area. Landscape and visual impacts will be crucial considerations in this development. We agree that Landscape, Seascape and Visual effects should be scoped into the EIA. With regards to key views and visual receptors fuller consideration should be given to a number of views including: the approach to Stornoway Harbour and the ferry terminal, and views from Lews Castle Grounds and Castle including the Lews Castle and Lady Lever Park designations; views and amenity of residents within Stornoway and surrounding areas; and views from within and towards in the Conservation Area in the EIAR. The developer/agent should liaise with the Planning Dept on appropriate finalised viewpoints. **Climate Crisis, Mitigation and Flood Risk** NPF4 requires that proposals are sited and designed to minimise lifecycle greenhouse gas emissions as far possible and that proposals are sited and designed to adapt to current and future risks from climate change. Paragraphs 17.3.1 and 17.4.1 addresses the carbon emissions from construction and operation of the site but also considers that as the development is assisting in the development of renewable energy this will help off set the carbon emissions. While the site lies partly within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Maps and may therefore be at medium to high risk of flooding. The Development Plan supports development for essential infrastructure where the location is required for operational reasons. It is noted that the Scoping Report states that the design of the land reclamation areas is in the region of + 7.2- 7.5m relative to CD and no permanent buildings are proposed on the platform. This is taking into account the 1 in 200 year storm event will result in coastal flooding at a height of 3.4m AOD and sea level rises.

		Biodiversity and Natural Heritage The proposed DWS is not within any natural heritage designated sites but it is close to a number of designated sites including the North East Lewis Marine Protection Area, Inner Hebrides and the Minches SAC and a number of onshore SPA, SAC, Ramsar and SSSI sites. While the development will not require planning permission, Policy 3 of NPF 4 States "b) Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention. This will include future management. To inform this, best practice assessment methods should be used. Proposals within these categories will demonstrate how they have met all of the following criteria: i.the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats; ii.wherever feasible, nature-based solutions have been integrated and made best use of; iii.an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements; iv.significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long term retention and monitoring should be included, wherever appropriate; and v.local community benefits of the biodiversity and/or nature networks have been considered" The Scoping report identifies designated sites relevant to the proposal within 20km of the DWS site. The Report separates out the impact of the development on marine and terrestrial species both during construction and operation of the port and identifies mitigation measures to reduce impact on affected species. Advice should be sought from NatureScot with regard to the proposed mitigation measures. If the development proposals are likely to have a significant effect on a European Site the Harbour Authority (as competent Authority) will have to undertake an Appropriate Assessment. **Soils and Minerals** The Scoping Report identifies both carbon rich soils and peatland in the area that is to be removed prior to rock excavation. While the work for this project is similar to the Deep Water Port additional materials will be excavated

		and will similar methodology will be used. The construction impacts on land and soil will be scoped into the EIA . While the project will not require planning permission as it is addressed by other consenting regimes it should be noted that NPF4 policy 5 supports development proposals on peatland, carbon-rich soils and priority peatland habitat where the development is for: i. Essential infrastructure and there is a specific locational need and no other suitable site; ii. The generation of energy from renewable sources that optimises the contribution of the area to greenhouse gas emissions reductions targets; d) Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify: i. the baseline depth, habitat condition, quality and stability of carbon rich soils; ii. the likely effects of the development on peatland, including on soil disturbance; and iii. the likely net effects of the development on climate emissions and loss of carbon. The Scoping Report identifies that rock for the development will come from land adjacent to the proposed DWP. The OHLDP allows for the extraction of minerals near or on the site of associated infrastructure projects. **Water Management and Coastal Development** The Development Plan supports development on the coast where it provides essential infrastructure and the location need is essential for operational reasons. However, development is expected to avoid adverse impacts on the water environment and sufficient information should be provided to assess the likely effects. The potential construction impacts identified for the DWS are increased sediment in water column from dredging, infill of land reclamation area and surface water run off; loss of containment of fuel or concrete and the introduction of Non Native Marine Species. The Report provides mitigation measures for both construction an operational impact on the water environment. The determining authority should seek advice from SEPA and NatureScot regarding the suitability of the proposed measures. It is agreed that the impact of the development of the Coastal process of Stornoway Harbour should be scoped in. **Archaeology and Cultural Heritage** NPF4 requires that development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for

		change, including cumulative effects and provide a sound basis for managing the impacts of change. The OHLDP protects the setting of Scheduled Monuments and Conservation Areas. The Scoping Report identifies one on shore heritage asset within the proposed DWS footprint and three within a 100m buffer of the DWS footprint. The report also cites three finds within the DWP watching brief. There are a number of Scheduled Monuments with intervisibility at 5km and 15km and 9 Category A listed buildings that will also have intervisibility with the site, as will the Stonoway Conservation Area and Lews Castle and Lady Lever Park a Garden Designed Landscape. The report also identifes a number of off shore assets (one within the DWS footprint). The report recommends that Archaeology and Cultural Heritage is scoped in the EIA and lists the sites to be included in the assessment. It is recommended that the view of the Comhairle Archaeologist is sought on this issue. **Sustainable Transport** OHLDP Policy EI 9 Transport Infrastructure identifies 'ports and harbours' as one of the priority areas for upgrading and developing the transport infrastructure. The policy requires development to: fit with the character of the area, include a landscaping plan, utilise SuDS, and accommodate improved road safety related to the proposal. NPF4 policy 13 supports development which provides safe links to local facilities via walking, wheeling and cycling networks. It is noted that consent has been granted for a path connecting the DWP with the existing path network in the castle grounds. This path will facilitate active travel to DWS from Stornoway. It is noted that it is proposed to Scope into the EIA report Access, Traffic and Transport for the construction phase using the a Traffic Assessment with a similar study area as that for the DWP. Given the nature of location of the development this is deemed to be acceptable.
Marine Licensing and Consenting	05/06/24	Thank you for your email We are unable to offer substantive comments at this stage.
Floodrisk	31/05/2024	With regard to Coastal processes, Climate Change, Flooding I have no comment to make on the content of the Scoping Report.
Western Isles District	31/05/2024	Thank you for consulting with the Western Isles District Salmon Fisheries Board regarding the Deep Water South project. Having studied section 13 of the scoping report WIDSFB are concerned over the repeated inference that

Salmon Fisheries Board		no impact is anticipated on migratory salmonids. Since the Deep Water Port EIA was published in 2020 Atlantic Salmon have been reclassified on the IUCN Red List as an endangered species in Great Britain. This designation reflects the serious population decline Atlantic Salmon have suffered which the IUCN suggest is partly due to water quality. The development presents a risk of increased sediment loading as well as noise from piling work. WIDSFB would prefer a precautionary approach be adopted whereby the potential for impact to occur is anticipated and mitigation measures are identified. The Scoping report mentions adult Atlantic Salmon on their return migration to spawn but there is no mention of outward migrating Salmon smolts. Dredging and piling work should be avoided during sensitive times for wild salmon. This would include mid April to the end of May for the smolt run and then mid June until the end of September for returning adults. Further information on smolt run timing, swimming speeds and migration is available via the west coast tracking project. In summary WIDSFB do not agree that Atlantic Salmon/Migratory Salmonids should be scoped out of the Deep Water South EIA.
Environmental Health	31/05/2024	I refer to the above and the scoping report and am satisfied with the reasoning for scoping out the parts relevant to our service (Air Quality, Soil Quality, Contaminated Land, shellfish protected waters/classification, noise and vibration, therefore agree with them being scoped out. I am assuming that the Comhairle will be consulted on the final application and will have an opportunity to recommend potential conditions then.
Economic Development	31/05/2024	No comment on this one from ED side