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**The Scottish Government
Energy Consents Unit**

**Scoping Opinion On Behalf Of Scottish Ministers Under The
Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017**

**Harris to Stornoway 132 kV Overhead Line Replacement
Scottish Hydro Electric Transmission Plc**

11 July 2022

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1. Introduction

1.1 This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to Scottish Hydro Electric Transmission plc a company incorporated under the Companies Acts with company number SC213461 and having its registered office at Inveralmond House, 200 Dunkeld Road, Perth, PH1 3AQ (“the Company”) in response to a request dated 12 May 2022 for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed Harris to Stornoway Overhead Line Replacement. The overhead line will be approx. 58 km and will be supported by trident wooden poles (“the proposed development”). The request was accompanied by a scoping report.

1.2 The proposed development would be located between the Harris grid supply point, 6 km to the south of Tarbert, Harris and the existing substation on Lewis 3 km south of Stornoway.

1.3 The proposed development consists of a new 132 kV overhead line from Harris to Stornoway. The overhead line will be approx 58 km.

1.4 In addition to the overhead line there will be ancillary infrastructure including:

- Vegetation clearance along the overhead line (OHL) for the lifetime of the Proposed Development to comply with the Electricity Safety, Quality and Continuity Regulations (ESQCR) 2021;
- Upgrade existing or establishment of new junction bellmouths;
- Establishment of temporary and permanent access, including installation of bridges and culverts, for the construction and maintenance of the OHL;
- An LOD for proposed new access tracks, as defined in section 2.3
- Establishment and reinstatement of temporary site compounds
- Establishment of material drop off points, where material can be dropped off by helicopter;
- Installation of temporary measures to protect road and water crossings during construction (scaffolding etc) and
- Dismantling of the existing OHL

1.5

The proposed development is predominantly located in a rural area. A number of properties are located in close proximity to the Proposed Development including within the settlements of Laxay, Balallan, Arivruaich, Scaladale, Ardhasaig, Tarbert and Diraclett. Locations where the proposed Development lies within 72 m of the preferred alignment are at Ardhasaig and Tarbert.

1.6 The Company indicates the proposed development would not have a fixed operational life assuming the proposed Development will be operational for 40 years or more. The effects associated with the construction phase can be considered to be representative of worst case decommissioning effects, and therefore no separate assessment is proposed as part of the Environmental Impact Assessment Report.

1.7 The proposed development is solely within the planning authority of Comhairle nan Eilean Siar.

2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between the Energy Consents Unit and Scottish Hydro Electric Transmission plc. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 18 May 2022. The consultation closed on 17 June 2022. Extensions to this deadline were granted to Comhairle nan Eilean Siar Planning Authority. The Scottish Ministers also requested responses from their internal advisors Transport Scotland and Scottish Forestry. Standing advice from Marine Scotland Science (MSS) has been provided with requirements to complete a checklist prior to the submission of the application for consent under Section 37 of the Electricity Act 1989. All consultation responses received, and the standing advice from MSS, are attached in **ANNEX A Consultation responses**.

2.2 The purpose of the consultation was to obtain scoping advice from each consultee on environmental matters within their remit. Responses from consultees and advisors, including the standing advice from MSS, should be read in full for detailed requirements and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Impact Assessment (EIA) report.

2.3 Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.

2.4 No responses were received from: BT, Civil Aviation Authority – Airspace, Defence Infrastructure Organisation, Fisheries Management Scotland, Western Isle District Salmon Fisheries Board, John Muir Trust, Mountaineering Scotland, National Grid, Scottish Right of Way and Access Society, Scottish Forestry, Scottish Wildlife Trust, Scottish Wildland Group, Scottish Wildlife Trust, Visit Scotland, West of Scotland Archaeology Service, North Lochs Community Council, Stornoway Community Council, Kinloch Community Council and North Harris Community Council.

2.5 With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section 37 consent is submitted subsequent to this EIA scoping opinion.

2.6 The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.

3. The Scoping Opinion

3.1 This scoping opinion has been adopted following consultation with Comhairle nan Eilean Siar Planning Authority, within whose area the proposed development would be situated, NatureScot (previously “SNH”), Scottish Environment Protection Agency and Historic Environment Scotland, all as statutory consultation bodies, and with other bodies which Scottish Ministers consider likely to have an interest in the proposed development by reason of their specific environmental responsibilities or local and regional competencies.

3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated 12 May 2022 in respect of the specific characteristics of the proposed development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

3.3 A copy of this scoping opinion has been sent to Comhairle nan Eilean Siar Planning Authority for publication on their website. It has also been published on the Scottish Government energy consents website at www.energyconsents.scot.

3.4 Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in **Annex A**.

3.5 Scottish Ministers are satisfied with the scope of the EIA set out at Sections 4 to 13 of the scoping report.

3.6 In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.

3.7 Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.

3.8 Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.

3.9 MSS provide generic scoping guidelines for onshore wind farm and overhead line development (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

3.10 In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

3.11 MSS also provide standing advice for overhead line development (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.

3.12 Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at <http://www.gov.scot/Publications/2017/04/8868>, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.

3.13 The scoping report identified viewpoints at paragraph 4.2. 23 and at Table 4.2. to be assessed within the landscape and visual impact assessment. Please note Comhairle nan Eilean Siar Planning Authority's response requesting an additional viewpoint.

3.14 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.

4. Mitigation Measures

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

5. Conclusion

5.1 This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 37 consent for the proposed development.

5.2 This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.

5.3 Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.

5.5 Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.

5.6 Applicants are reminded that there will be limited opportunity to materially vary the form and content of the proposed development once an application is submitted.

5.7 When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.

5.8 It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB).

Joyce Melrose

**Energy Consents Unit
11 July 2022**

ANNEX A

Consultation

List of consultees

- Comhairle nan Eilean Siar
- Historic Environment Scotland
- NatureScot (previously SNH)
- Scottish Environmental Protection Agency
- British Horse Society Scotland
- British Telecommunications plc*
- Civil Aviation Authority – Airspace*
- Crown Estate Scotland
- Defence Infrastructure Organisation*
- Fisheries Management Scotland*
- Highlands and Islands Airports Limited
- Joint Radio Company Limited
- John Muir Trust*
- Kinloch Community Council*
- Maritime and Coastguard Agency
- Mountaineering Scotland*
- National Grid*
- NATS Safeguarding
- North Harris Community Council*
- North Lochs Community Council*
- Nuclear Safety Directorate
- RSPB Scotland
- Scottish Rights of Way and Access Society*
- Scottish Water
- Scottish Wildlife Trust*
- Scottish Wild Land and Group*
- Stornoway Community Council*
- Visit Scotland*
- West of Scotland Archeology Society*
- Western Isle District Salmon Fisheries Board*

*No response was received.

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland, Scottish Forestry* and Marine Scotland (in the form of standing advice from Marine Scotland Science).



COMHAIRLE NAN EILEAN SIAR

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e-mail : mferguson@cne-siar.gov.uk
writer : Morag Ferguson Ext 330838
our reference :
your reference :
date : 6 July 2022

Dear Sirs

**PLANNING REFERENCE 22/00244; ECU REFERENCE ECU00004490
SCOPING OPINION RESPONSE COMMENTS BY COMHAIRLE NAN E ILEAN SIAR
STORNOWAY - HARRIS 132 KV OVERHEAD LINE CONNECTION (LT000245)**

I refer to the request dated 27 May 2022 seeking the comments of Comhairle nan Eilean Siar as Planning Authority on the scoping Report prepared in relation to the above project.

A number of services of the Comhairle has been consulted and the following comments are offered in relation to the Scoping Report

General Comments:

- Comhairle nan Eilean Siar is in general agreement with the Issues scoped In and Out (Table 1).
- It would be useful to have an additional figure that shows in detail (existing and proposed) the sections where the route is deviating from the current route (e.g. Ardhasaig)
- The Visual Receptors map has Core Footpaths incorrectly annotated as 'Highland Council' Core Paths.
- Access and Core paths. For clarity it should be noted the Hebridean Way and the Hebridean Cycleway are two separate routes. It is correct (in the note to 11.2.2) to state that the Hebridean Cycleway is no longer classified as National Cycle Route 780 and it is now classified by Sustrans as an "On the road route not on the cycle network"
- Paragraph 2.6.1 - It is suggested that Decommissioning should be identified as a stage notwithstanding the adopted position that effects should not exceed worst case of construction.

PLANNING – RE SECTION 4 - LVIA

It is suggested that given the planned deviation of the new line from the existing route that the following additional Viewpoint be added at Ardhasaig Pier or Site of Isle of Harris Distillery (IHD) Bonded warehouses (looking east towards the HV Line); Receptors - Villagers and potential visitors to the IHD Bonded Warehouses.

It is suggested given the planning policy protection of Commemorative Sites that a viewpoint be added where the overhead line is in close proximity to the Pairc Land Raiders Cairn (on the moorland near the junction of the Eisgean Road with the main road).

COMHAIRLE ARCHAEOLOGY SERVICE RE SECTION 5

Matters relating to Archaeology and Cultural Heritage are considered within chapter 5 and in the Cultural Heritage Study Areas maps of the EIA Scoping Report.

Desk based assessment and walkover survey during the route selection process have informed the cultural heritage baseline data for this study. The report appropriately identifies both designated and undesignated areas, sites, and structures and the potential for direct or indirect effects from the construction or operation of the overhead line. The heritage assets identified, range from prehistory through to the post medieval period, with many sites relating to post medieval settlement and farming practise.

At this stage it was possible to scope out a number of historic environment designations and assets, with no adverse impact anticipated from the development; these mostly comprised of the urban designations in Stornoway. Currently one designated site, Druim Dubh Stone Circle (a scheduled monument) has been identified as receiving potential negative impact on its setting from the proposed scheme.

The report identifies that the current base line data will be refined through demarcation of assets located within inner and outer study areas and in all access routes. This will be done through further desk-based assessment, field survey and LVIA studies.

Mitigation measures will be managed by the appointment of an Archaeological Clerk of Works for the duration of the construction phase. These measures range from demarcation of sites close to works, micro-siting , watching briefs and potentially excavation. Consideration of unknown significant discoveries has also been included and all works will be set out in WSI's, agreed with the Comhairle Archaeology Service on behalf of the planning authority.

Indirect impacts will be addressed through assessment of effect on setting of identified heritage assets within the study areas of the proposed development. Where necessary further mitigation options will be considered to avoid, reduce, and offset negative impact on the historic environment resource.

Please be advised that the Archaeology Service is content with the methodology proposed EIA Scoping Report.

COMHAIRLE BIODIVERSITY OFFICER RE SECTION 6

The route of the proposal crosses through The Lewis Peatlands SPA Ramsar site Important Bird Areas and SSSI. Subject to the detailed input of NatureScot, the scope of the EIA report as proposed, is considered to be sufficient to assess the likely significant effects on the environment and biodiversity

Comhairle Biodiversity Officer re Section 7

The route of the proposal crosses through The Lewis Peatlands SPA Ramsar site Important Bird Areas and SSSI. Subject to the detailed input of NatureScot, the scope of the EIA report as proposed, is considered to be sufficient to assess the likely significant effects on ornithological interests.

VARIOUS COMMENTS RE SECTION 8

PLANNING RE PARA 8.2.2

Regard should be had to the generic Scottish Water advice for development being undertaken in or close to Drinking Water Protected Areas.

COMHAIRLE - ENVIRONMENTAL HEALTH

Based on the scoping report I am satisfied with Private Water Supply (PWS) being scoped out of the EIA and satisfied with above proposals re Private Water Supply (PWS)

COMHAIRLE NAN EILEAN SIAR - FLOOD RISK

- What environmental information do you hold or are aware of that will assist in the EIA described here?

We don't hold any environmental information relevant to the EIA

- Do you agree with the proposed approach for baseline collection, prediction and significance assessment?

We are satisfied with the proposed approach

- Are there any key issues or possible effects which have been omitted?

None noted.

- Do you agree with the list of issues to be scoped out, and the rationale behind the decision?

We are in agreement with the list of issues to be scoped out

ROADS COMMENTS RE SECTION 9

- What environmental information do you hold or are aware of that will assist in the EIA described here?

We don't hold any environmental information relevant to the EIA

- Do you agree with the proposed approach for baseline collection, prediction and significance assessment?

We are satisfied with the proposed approach

- Are there any key issues or possible effects which have been omitted?

There are some specific issues that I would be looking at when more detailed information is available (proximity to existing carriageway, construction on steep terrain above live carriageway etc) which I assume will be assessed in the traffic and transport chapter.

NOTE: During the construction phase any poles/stays should be a min 7m from the main road edge.

- Do you agree with the list of issues to be scoped out, and the rationale behind the decision?
We are in agreement with the list of issues to be scoped out
- Most important issue
Traffic and Transport

COMHAIRLE – ACCESS OFFICER RE SECTION 11

The information provided by the developer is adequate and is considered to be sufficient to assess the likely significant effects to public access and the long distance routes.

COMHAIRLE - ENVIRONMENTAL HEALTH RE SECTION 12 AND 13

Para 12.2.3 Based on the scoping report I am satisfied with Noise and Vibration being scoped out of the EIA.

Para 12.6.1 Based on the scoping report I am satisfied with Construction Noise being scoped out of the EIA.

Para 13.5.1 Based on the scoping report I am satisfied with Air Quality being scoped out of the EIA.

GENERAL POLICY ADVICE BY COMHAIRLE - STRATEGIC PLANNING

The Comhairle welcomes the developers approach, noting that a key part of the Applicant's Sustainability Strategy is to achieve Biodiversity Net Gain (BNG) as part of project delivery. As such, the ambition is to ensure that activities not only maintain the balance that exists but enhance the biodiversity in the area.

Regard should be afforded to the relevant provisions of National Planning Framework (NPF3) and Scottish Planning Policy (SPP), noting that the Draft NPF4 has been published and sets out how the Scottish Government's approach to planning and development will help to achieve a net zero, sustainable Scotland by 2045; it will include 35 national planning policies which will replace those currently found in the Scottish Planning Policy, as well as other relevant national policy guidance and the provisions of the Outer Hebrides Local Development Plan (OHLDP) and the statutory Supplementary Guidance for Wind Energy Developments (Wind Energy SG).

Scottish Planning Policy 2014 introduces a presumption in favour of development that contributes to sustainable development. SPP also requires that planning authorities through their Development Plans should seek to ensure an area's full potential for electricity and heat from renewable sources is achieved, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations.

Development Plan Local planning policy is provided in the Outer Hebrides Local Development Plan (LDP 2018).

Policy EI 8: Energy and Heat Resources states that the Comhairle will support proposals that contribute to meeting the targets and objectives of the National Planning Framework 3, 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.

A schedule outlining the proposed phasing of the construction and the decommissioning and removal of the existing OHL would be helpful to include.

Development Strategy The overhead line passes through both 'rural settlement' and 'outwith settlement' areas as defined in LDP Policy DS1.

Within 'rural settlement' the principal policy objective is to accommodate development to meet sustainable growth for local needs, particularly for residential, agriculture, tourism and service activities. Development proposals will be assessed against a siting and design appropriate to the established rural character and settlement pattern of the local area.

In 'outwith settlement' areas as defined in Pol DS1 where 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 proposal is not a LDP proposal site, the EIA Report must demonstrate a justified need for the proposed development in the location (Pol DS1) and as such the principle of development in that location is considered appropriate, subject to satisfying all other LDP policies.

Landscape The proposed development crosses numerous landscape character types, which differ slightly from the EIA due to the updated assessment by SNH 2019. These include Gently Sloping Crofting, Rocky Moorland – Outer Hebrides, Linear Crofting and Boggy Moorland – Outer Hebrides. Indirect relevant landscape character types could also include Prominent Hills and Mountains. Policy NBH1 states that 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 note that the EIA will incorporate the LCA updated by Scottish Natural Heritage (rebranded NatureScot) in 2019. Consideration of micro siting of trident poles to minimise visual intrusion on key views should be a consideration in the EIA LVIA.

There is a Garden and Designed Landscape (GDL) Lews Castle and Lady Lever Park to the North of the proposed development, consideration of any residual effects on this designated site should be addressed by the EIA.

Wild Land The route passes through (30) Eisgiein Wild Land Area and (31) Harris-Uig Hills Wild Land Area. The EIA should assess whether the proposal will have any unacceptable adverse effects on Wild Land and if required, propose mitigation measures such as undergrounding power lines in sensitive areas,

Natural Heritage Policy NBH2 states that Development which is likely to have a significant effect on a Natura site and is not directly connected with or necessary to the conservation management of that site will be subject to an Appropriate Assessment by the Comhairle.

It is noted that following desk based research, the developer considers that an HRA screening assessment of the proposal in relation to the potential for significant effects on the Lewis Peatlands SPA, the North Harris Mountains SPA and the West Coast of the Outer Hebrides SPA will be required.

Where there is good reason to suggest that a European Protected Species (EPS) is present on site, or may be affected by a proposed development, the Comhairle will require any such presence to be established and, if necessary, a mitigation plan provided to avoid or minimise any adverse impacts on the species, prior to determining the application.

... The EIA is required to assess impacts on ornithology, particularly in relation to phasing works to avoid breeding season disturbance avoiding construction (and decommissioning) during the breeding season (February to July), potentially undergrounding the power lines in the vicinity of highly sensitive species providing proven mitigation measures such as bird diverters to minimize collision risks.

Built Heritage Commemorative Sites. The overhead line is near the Pairc Land Raiders Cairn. Policy NBH4 Built Heritage states that the Comhairle will seek to manage the special architectural, historic and cultural interest of war memorials and commemorative sites of local importance. Any site features which are known to have been formally dedicated as a memorial to a person or event will be deemed to have commemorative significance. In addition, any site with features which are widely understood to be closely associated with a person or event may be considered to have commemorative significance.

Due to the inherent value and cultural significance of the landscape in relation to the monument, consideration of the effects of the proposal on the monument and its landscape setting and whether mitigation is required to minimise visual intrusion on the landscape setting of the monument.

The EIA should identify any other built heritage designations and assess whether the OHL will have unacceptable adverse effects on these and their setting.

Access and Recreation The proposed OHL follows the route of the Hebridean Way walking and on-road cycling route along the A859 from Luirbost in Lewis to Grosclott in Harris. In addition, several core paths are located within one kilometre of the proposed development, the OHL also crosses the Aline Woodland Walks. Consideration should be given in the EIA of opportunities for the access routes required for the development to contribute to improvements to, and expansion of the existing path network (including the improvement of access to the Core Path network and Hebridean Way).

Peat & carbon rich soils Policy EI 5: Development should be designed to minimise adverse impacts on soils caused by ground disturbance, compaction or excavation. Developers should assess the likely effects associated with any development work on soils, particularly machair soil, peat, or other carbon-rich soils and associated vegetation, and aim to mitigate any adverse impacts arising. It is recognised that while a significant quantity of peat is proposed to be excavated, the proposal intends to limit the scope for significant adverse effects through reuse and site restoration and that a Peat Landslide Hazard Risk Assessment (PHLRA) will be carried out and a Peat Management Plan (PMP) will be required be provided should any deemed planning consent be given. Provision of a CEMP Appointment of a ECoW will also be a requirement from the start of the construction phase and throughout the project to manage storage and reinstatement of soil and peat.

Trees & Woodland Policy NBH3: In order to minimise any adverse impacts on amenity, biodiversity or landscape value, developers will be required to incorporate existing trees and woodland into developments through sensitive siting and design. Where loss is unavoidable, appropriate replacement planting should be sought through the use of planning conditions or

through a legal agreement if appropriate. The EIA should provide appropriate information to aid assessment of this matter. It is noted that a key part of the Developer's Sustainability Strategy is to achieve Biodiversity Net Gain (BNG) as part of project delivery. As such, the ambition is to ensure that activities not only maintain the balance that exists but enhance the biodiversity in the area. To address compensatory planting in accordance with the Scottish Government's Control of Woodland Removal Policy it is recommended that to encourage biodiversity and mitigate against the loss of forestry that native species are planted and that a Habitat Management Plan is provided to facilitate this purpose.

Waste Management We also recommend that any felled trees and brash that is not commercially viable is dealt with in a sustainable manner and in compliance with LDP policy EI 4 on waste management Preparation of a Site Waste Management Plan will be required to accompany proposals for developments involving significant demolition works, this policy will apply to the dismantling of the existing line.

Flooding SEPA flood maps indicate small pockets of potential surface water flooding on site. Policy EI7: Development proposals should avoid areas susceptible to flooding and promote sustainable flood management.

Water & Waste water It is noted that a Sustainable Drainage System is proposed for the development.

Water Environment Policy EI 3: Development proposals should avoid adverse impact on the water environment. There are two Drinking water Protection Areas (DWPS) on the route of the proposed development at Bowglass DWPA and at Maaruig DWPA, the EIA must demonstrate that these will be protected, and any potential effects of contamination or pollution minimised and mitigated against. A minimum buffer strip of six metres should be incorporated between any water body and proposed development to enable access and maintenance all year round. We note that the Hydrology and Hydrogeology assessment will include a Private Water Supply Risk Assessment as an appendix which will identify private water supplies or other abstractions within 250m of pole locations, or 100m of temporary access tracks, this report must demonstrate how abstractions will be protected in accordance with SEPA guidance (LUPS-GU31). The proposal should demonstrate no significant effects both during construction and after completion on the water quality in groundwater, adjacent watercourses or areas downstream; existing groundwater abstractions within 250m; and water quality and natural flow patterns and sediment transport processes in all water bodies.

I trust the foregoing comments are of assistance in finalising the scope of the EIA Report.

Yours sincerely
Redacted

Morag Ferguson
Planning Manager (Development Management)
Communities Department

By email to: Econsents_admin@gov.scot

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Our case ID: 300052132
Your ref: ECU00004490

07 June 2022

Dear Energy Consents Unit

[The Electricity Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017
Harris to Stornoway Overhead Line Replacement - EIA Scoping \(Section 37\)
Scoping Report](#)

Thank you for your consultation which we received on 18 May 2022 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

Comhaire nan Eilean Siar's archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development

We understand that the proposed development comprises a 132 kV overhead line supported by trident wood poles between the Harris grid supply point south of Tarbert and an existing substation on Lewis, approximately 3 km south of Stornoway.

Scope of assessment

As the scoping report notes, in our previous correspondence regarding potential impacts on our historic environment interests (dated 24 March 2022) we noted the proximity of the preferred alignment to the scheduled monument **Druim Dubh stone circle (SM 5504)**. We therefore welcome that the scoping report has recognised the need to assess the potential for impacts on the setting of this site and offer mitigation where appropriate. We also welcome the commitment to provide a visualisation from this site to support the assessment as requested in our previous consultation.

In terms of the proposed approach to the assessment in general we note that an appropriate baseline has been identified and note that off-line construction access routes will also be assessed as well as the inner and outer study areas.

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://conservation.historic-scotland.gov.uk/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Andrew Stevenson and they can be contacted by phone on 0131 668 8960 or by email on andrew.stevenson2@hes.scot.

Yours faithfully

Historic Environment Scotland

Joyce Melrose
Energy Consents Unit
Scottish Government
joyce.melrose@gov.scot

13 June 2022

Our ref: CEA167047

Dear Ms Melrose

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR HARRIS TO STORNOWAY OVERHEAD LINE REPLACEMENT

Thank you for requesting NatureScot's views on information which ought to be provided in the environmental statement (ES) for a new overhead lines between Harris and Stornoway proposed by Scottish Hydro Electric Transmission plc (SHE Transmission).

Natura sites

The proposed transmission line runs through or close to two Natura sites and our advice on potential impacts on these is as follows:

Lewis Peatlands Special Protection Area (SPA)

We advise that the proposed works are likely to have a significant effect on the qualifying features of the SPA. Our reasons for this advice are:

- Collision risk to qualifying bird species from overhead lines once constructed
- Potential disturbance to qualifying bird species during construction, particularly during the breeding season
- Loss and damage to habitats which support the qualifying bird species

It is our advice therefore that an appropriate assessment is required and the ES should provide information needed to allow the Scottish Government to carry out this appropriate assessment. The loss and damage to the blanket bog, heath and other habitats which support qualifying bird species should be quantified in the ES. This will require NVC survey data.

Lewis Peatlands Special Area of Conservation (SAC).

It is SNH's view that the proposed works are not likely to have a significant effect on the qualifying features of the SAC. Our reasons for this advice are:

- The distance between the proposed works and the habitat features of the site
- Weak hydrological connections between the site and the habitat features of the site
- Low risk of impacts on the otter qualifying feature of the SAC once standard mitigation techniques are applied.

Protected Species

The proposals for protected species surveys, impact assessment and mitigation are appropriate. The most important bird species to consider will be breeding divers, raptors and waders, including the recently established hen harries population SW of Stornoway. Risks of disturbance, displacement and collision should be assessed and quantified as far as possible.

Other habitats and species

NatureScot recommends that all peatland habitats within the survey corridor should be mapped to NVC standards. This is because the NVC is more sensitive to the hydrological variation which occurs in blanket bog than is Phase 1, and this will be important in determining construction methods and mitigation measures.

Landscape and visual effects

South Lewis, Harris and North Uist National Scenic Area (NSA)

The proposed line overlaps the northern part of the NSA. Effects on the special qualities of the NSA should be assessed, to help inform an assessment of impacts on the overall integrity of the area.

We recommend that the cumulative landscape and visual impact assessment should include developments which are subject to valid applications as well as those which are constructed and approved.

Yours sincerely

MARK MACDONALD

Operations Officer - West

01463 701634

mark.macdonald@nature.scot

Our ref: 5304
Your ref: ECU00004490

SEPA email contact
Planning.North@sepa.org.uk

17 June 2022

Energy Consents Unit
The Scottish Government

By email only to: Econsents_admin@gov.scot

To whom it may concern

**Electricity Act 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations
2017
Request for Scoping Opinion for Harris to Stornoway Overhead Line Replacement**

Thank you for consulting SEPA on the scoping opinion for the above development proposal by your email received on 18 May 2022.

Advice to the determining authority

We consider that the following key issues must be addressed in the Environmental Impact Assessment process:

- a) Minimising impacts on peat and peatland.
- b) Avoiding good quality or rare GWDTE habitats and minimising impacts on other GWDTE
- c) habitats.
- d) Avoiding impacts on watercourses and other water features by ensuring suitable buffers and using best practice design crossings.

Please see the attached appendix for some generic advice on scoping for this type of development; it should be ensured that each aspect is covered in the submission.

Regulatory advice for the applicant

Proposed engineering works within the water environment will require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended). Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012.

Details of regulatory requirements and good practice advice 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: NHNI@sepa.org.uk.

If you have queries relating to this letter, please contact planning.north@sepa.org.uk including our reference number in the email subject.

Yours sincerely

Aden McCorkell
Senior Planning Officer
Planning Service

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).

Appendix 1: Detailed scoping requirements

This appendix sets out our scoping information requirements. 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 in order **to avoid delay and potential objection**.

1. Site layout

1.1 All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible. 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. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.

2. Engineering activities which may have adverse effects on the water environment

2.1 The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map 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) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.

2.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.

2.3 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](#).

2.4 Refer to Appendix 2 of our [Standing Advice](#) for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our [Technical flood risk guidance for stakeholders](#) outlines the information we require to be submitted as part of

a Flood Risk Assessment. Please also refer to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

3. Disturbance and re-use of excavated peat and other carbon rich soils

3.1 Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments must aim to minimise this release."

3.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO₂ and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.

3.3 The submission must include:

- a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.
- b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.

3.4 To avoid delay and potential objection proposals must be in accordance with [Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste](#) and our [Developments on Peat and Off-Site uses of Waste Peat](#).

3.5 Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.

3.6 Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

4. Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)

4.1 GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:

- a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of

micro-siting. The survey needs to extend beyond the site boundary where the distances require it.

- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.

4.2 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.

5. Existing groundwater abstractions

5.1 Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

- a) A map demonstrating that all 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. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

5.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice on the minimum information we require to be submitted.

6. Forest removal and forest waste

Proposals for felled forest material must be shown to comply with our [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#).

7. Borrow pits

7.1 Scottish Planning Policy states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The submission must provide sufficient information to address this policy statement.

If borrow pits are proposed the following information should also be submitted:

- a) A map showing the location, size, depths and dimensions of each pit.
- b) Justification for the proposed location of each borrow pit and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.
- c) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site

specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. 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, drawings of what is proposed in terms of engineering works.

8. Pollution prevention and environmental management

- 8.1** A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to [Guidance for Pollution Prevention](#) (GPPs)

Energy Consents Unit
Scottish Government
5 Atlantic Quay 150
Broomielaw
Glasgow G2 8LU

By email to:

Econsents_admin@gov.scot

Joyce.Melrose@gov.scot

18 May 2022

Dear Sir/Madam

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR
HARRIS TO STORNOWAY OVERHEAD LINE REPLACEMENT**

I refer to the above scoping opinion request for the proposed Harris to Stornoway Overhead Line, in the planning authority areas of Highland Council.

The British Horse Society (BHS) is always pleased to be consulted on transport, planning and development matters and where possible or necessary we are able to engage local riders to get a locally based response. Thank you very much for consulting with us, horses are important and good for people so their safety and capacity to access safe off road hacking is a key consideration in terms of their welfare and the wellbeing of their riders and those who look after them.

A project, like the one you are carrying out is an excellent opportunity to improve connections in a community and hopefully resolve any problems in terms of countryside access, transport and travel.

The BHS is here to help, so please do not consider this response the final word, we hope to work with you on an on-going basis to ensure horses and horse riders get as good a deal as they can out of any proposed improvements, so please do not hesitate to contact us in the future.

The Importance of Off-Road Riding

Scotland's equestrian industry is important with the horse being a major rural economic driver, recent joint research between SRUC and BHS showed:

Current trends in the sector point to a continued increase in horse numbers and riding activity in all geographical areas of Scotland and across a wide cross section of society. The expenditure on direct upkeep averages £3,105 per horse per annum.

This report also showed:

A concern for all riders, including tourists, is diminishing access to safe off-road riding. Most riding accidents happen on minor roads in the countryside. With increasing numbers of horses and riders requiring access to the countryside, more formal access to off-road riding will be a priority in areas considered of higher risk.

The full report can be accessed at:

http://www.sruc.ac.uk/downloads/file/2391/2015_scoping_study_on_the_equine_industry_in_scotland

Scotland has a duty to get horse riders off busy roads; few riders access busy roads by choice (and the horse has as much right to be on the public highway as cars, bikes and pedestrians) - but they often have no choice as that is the only way they can access their safe off road hacking.

I can also refer you to:

<http://www.rospa.com/road-safety/advice/horse-riders>

Equestrian road users are vulnerable - that means they are more likely to be involved in a road accident and also more likely to suffer the worst consequences.

Horses and their riders (as well as carriage drivers) are vulnerable on the road network. A collision between a horse and a vehicle can have life threatening consequences for the horse, rider and those in a vehicle. There is evidence to suggest that the number of road traffic collisions involving horses is underreported in casualty data.

Horse riding is more prevalent (particularly on roads) in certain parts of the country. Rural areas have larger numbers of horse riders, who make a significant contribution to the rural economy. Yet according to Road Safety Scotland 70% of road accidents happen on country roads.

<http://dontriskit.info/country-roads/view-the-campaign>

The BHS expects developers to work with representatives of the local horse riding community to understand their road safety and countryside access concerns and facilitate engagement with other partners and consider whether any road safety interventions should be introduced, where there are significant numbers of horse riders and/or road traffic collisions involving horses.

Under the Land Reform (Scotland) Act 2003, horse-riders and carriage drivers enjoy a right of access to most land in Scotland, provided that they behave responsibly. Land managers in turn are obliged to respect equestrian access rights and take proper account of the right of responsible access in managing their land. The Scottish Outdoor Access Code gives guidance on how the requirements to behave responsibly can be met. Please refer to:

www.outdooraccess-scotland.com

This access legislation, which is over a decade old now gives horse riders the same rights of responsible access as walkers and cyclists. It is vital that any off road tracks or non-motorised user's tracks or paths are multi-use catering for all including horse riders and carriage drivers.

Active Travel and Suitable infrastructure

Whilst the active travel movement does not consider equestrian travel to be a form of active travel there are many people for whom riding is an attractive mode of travel whether that be for travel purposes or leisure purposes, and the delivery of Active Travel should not discourage this, just as it should not discourage the use of micro-scooters, roller blades, skateboards and other similar modes of travel. In urban areas, many riding horses are kept within the 10 mile journey distance

and they must not be disadvantaged by new facilities that may be put in place for the cyclists. Level crossings which are currently used by equestrians should not be replaced by alternatives which would preclude the use by equestrians, for example, a footbridge. Similarly, other infrastructure like gates, bridges, cattle grids and slippery surfaces should all be installed with equestrians in mind. Access control must always be the least restrictive option.

The British Horse Society (BHS) represents the interests of the 3.4 million people in the UK who ride or who drive horse-drawn vehicles. With the membership of its Affiliated Riding Clubs and Bridleway Groups, the BHS is the largest and most influential equestrian charity in the UK. The BHS is committed to promoting the interests of all equestrians and the welfare of horses and ponies through education and training.

Please see attached an information sheet on equestrian access.

<https://www.pathsforall.org.uk/resource/outdoor-access-design-guide>

With over 70k equines in Scotland, equestrianism is worth £650 million to the Scottish economy annually with the Scottish Racing industry contributing £300 million and the rest of the industry generating £355 million according to recent research (Developing Benchmarks & Trends to Measure Equestrian Activity in Scotland - A report produced by the British Equestrian Trade Association August 2019 And Scottish Racing Annual Review and 2019 Outlook)

I trust that the above information is of assistance.

Redacted

**HELENE MAUCLLEN
SCOTTISH NATIONAL MANAGER
THE BRITISH HORSE SOCIETY**

Mcgroarty K (Kirsty)

From: Olivia Morrad <olivia.morrad@crownestatescotland.com>
Sent: 15 June 2022 09:08
To: Melrose J (Joyce); Econsents Admin
Subject: 20220615 Scoping consultee - Harris to Stornoway Overhead Line. Email to GovScot

Good morning,

Thank you for your email.

I write to confirm that the assets of Crown Estate Scotland are not affected by this proposal and we therefore have no comments to make.

Kind regards

Olivia Morrad
Assistant Portfolio Co-ordinator
Crown Estate Scotland

t: 0131 376 1506

Our team are currently working from home. Mail is occasionally being collected from our offices (addresses are at www.crownestatescotland.com/contact-us). Where possible, please email or call us rather than post mail.

LEGAL DISCLAIMER - IMPORTANT NOTICE The information in this message, including any attachments, is intended solely for the use of the person to whom it is addressed. It may be confidential and it should not be disclosed to or used by anyone else. If you receive this message in error please let the sender know straight away. We cannot accept liability resulting from email transmission. Crown Estate Scotland's head office is at Crown Estate Scotland, Quartermile Two, 2nd Floor, 2 Lister Square, Edinburgh, EH3 9GL.

Mcgroarty K (Kirsty)

From: HIAL Safeguarding <hialsafeguarding@traxinternational.co.uk>
Sent: 17 June 2022 14:05
To: Econsents Admin
Subject: RE: Scoping consultee - Harris to Stornoway Overhead Line

Your Ref: ECU00004490

Our Ref: 2022/214/SYY

Dear Sir/Madam,

Proposal: Harris to Stornoway Overhead Line Replacement.

Location: 58km of overhead line supported by wooden poles of a maximum height of 18 metres, with a typical average po

With reference to the above, our calculations show that, at the given position and height, this development would not infrin criteria for Stornoway Airport.

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

Yours faithfully,

Ed

Ed Boorman

HIAL Safeguarding (Acting for and on behalf of Highlands & Islands Airport Ltd)
m: +44 (0)7962 269420



e: hialsafeguarding@traxinternational.co.uk

e: safeguarding@hial.co.uk

Melrose J (Joyce)

From: JRC Windfarm Coordinations <windfarms@jrc.co.uk>
Sent: 09 June 2022 09:44
To: Melrose J (Joyce)
Subject: Harris to Stornoway Overhead Line - Scoping consultee [WF947960]

Dear joyce,

A Windfarms Team member has replied to your co-ordination request, reference **WF947960** with the following response:

Good Morning Joyce,

We do not have any concerns regarding Harris - Stornoway OHL.

Kindest Regards

Heather Willoughby

We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?auth=o1xr2bqaaffniaaaXTZRCD4OCRFZ%2FA%3D%3D>

Mcgroarty K (Kirsty)

From: navigation safety <navigrationsafety@mcga.gov.uk>
Sent: 17 June 2022 09:08
To: Melrose J (Joyce); Econsents Admin
Subject: RE: Scoping consultee - Harris to Stornoway Overhead Line

Dear Joyce

Thank you for your email dated 18th May 2022 inviting the MCA to comment on the Scoping Report for the proposed Harris to Stornoway 132kV OHL replacement project. The Scoping Report has been considered by representatives of UK Technical Services Navigation, and we would like to respond as follows

The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. We would expect the impact of works in or over the marine environment to be subject to an appropriate navigation risk assessment to consider the risks to shipping and navigation.

From the information provided it is my understanding that the works falls outside of the marine environment, and all works associated with the replacement project are on land. As there is no potential for impact on the marine environment as far as we can see from the proposals, there is no requirement for MCA to assess the risks to shipping and navigation on this occasion.

We hope you find this useful at scoping stage.

Kind Regards

Sam Chudley

Maritime Licence Advisor
Marine Licensing and Consenting
UK Technical Services Navigation

+44 (0) 7553 637057

Sam.Chudley@mcga.gov.uk



**Maritime &
Coastguard
Agency**

Maritime & Coastguard Agency

Bay 2/25, Spring Place
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Southampton SO15 1EG



Safer Lives, Safer Ships, Cleaner Seas

www.gov.uk/mca

Mcgroarty K (Kirsty)

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 31 May 2022 11:38
To: Melrose J (Joyce); Econsents Admin
Subject: RE: Scoping consultee - Harris to Stornoway Overhead Line [SG33372]

Our Ref: SG33372

Dear Sir/Madam

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

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

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

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

www.nats.co.uk



NATS Public

Mcgroarty K (Kirsty)

From: ONR Land Use Planning <ONR-Land.Use-Planning@onr.gov.uk>
Sent: 06 June 2022 14:05
To: Econsents Admin
Subject: ONR Land Use Planning - Application ECU00004490

Dear Sir/Madam,

With regard to planning application ECU00004490, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.

You can find information concerning our Land Use Planning consultation process here: (<http://www.onr.org.uk/land-use-planning.htm>).

Kind regards,

Vicki Enston
Land Use Planning
Office for Nuclear Regulation
ONR-Land.Use-planning@onr.gov.uk

Melrose J (Joyce)

From: Esme Clelland <Esme.Clelland@rspb.org.uk>
Sent: 16 June 2022 12:26
To: Melrose J (Joyce)
Subject: RE: Scoping consultee - Harris to Stornoway Overhead Line

Dear Joyce

Thank you for the consultation email. I confirm that RSPB Scotland does not intend to provide comment.

Esmé Clelland |

Senior Conservation Planner

07548 155 461 | My normal working pattern is Tuesday to Friday



The Royal Society for the Protection of Birds (RSPB) is a registered charity:
England and Wales no. 207076, Scotland no. SC037654.

Friday, 27 May 2022



Local Planner
Energy Consents Unit
5 Atlantic Quay
Glasgow
G2 8LU

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk



Dear Customer,

**Harris to Stornoway Overhead Line R, , Western Isles, HS2 9LE
Planning Ref: Harris to Stornoway Overhead Line Replacement
Our Ref: DSCAS-0065648-LZM**

Proposal: The Applicant is proposing to submit a s37 application for consent to construct and operate a single circuit 132 kV overhead line (OHL), supported by trident wood poles between the Harris grid supply point, approximately 6 km south of Tarbert, Harris, and an existing substation on Lewis, approximately 3 km south of Stornoway

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Water Capacity Assessment

Scottish Water has carried out a Capacity review and we can confirm the following:

- ▶ There is currently sufficient capacity in the North Lochs Water Treatment Works to service your development. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

Waste Water Capacity Assessment

- ▶ There is currently sufficient capacity for a foul only connection in the Balallan Waste Water Treatment works to service your development. However, please note that

further investigations may be required to be carried out once a formal application has been submitted to us.

Please Note

- ▶ The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

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

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

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
- ▶ Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Customer Connections department at the above address.

- ▶ If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
 - ▶ Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.
 - ▶ The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.
 - ▶ Please find information on how to submit application to Scottish Water at [our Customer Portal](#).
-

Next Steps:

▶ All Proposed Developments

All proposed developments require to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water via [our Customer Portal](#) prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.

Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

▶ Non Domestic/Commercial Property:

Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at www.scotlandontap.gov.uk

▶ Trade Effluent Discharge from Non-Domestic Property:

- ▶ Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and laundrettes. Activities not covered include hotels, caravan sites or restaurants.
- ▶ If you are in any doubt as to whether the discharge from your premises is likely to be trade effluent, please contact us on 0800 778 0778 or email

TEQ@scottishwater.co.uk using the subject "Is this Trade Effluent?".

Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found [here](#).

- ▶ Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.
- ▶ For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas, so the development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.
- ▶ The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer. Further information can be found at www.resourceefficientscotland.com

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.

Yours sincerely,

Ruth Kerr

Development Operations Analyst

Tel: 0800 389 0379

developmentoperations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Joyce Melrose
Energy Consents Unit
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Your ref:
ECU00004490

Our ref:
GB01T19K05

Date:
14/06/2022

Econsents_Admin@gov.scot

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR HARRIS TO STORNOWAY OVERHEAD LINE REPLACEMENT

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Ramboll (UK) Ltd in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, we would provide the following comments.

Proposed Development

We understand the proposal comprises a single circuit 132 kV overhead line (OHL), supported by trident wooden poles between the Harris grid supply point (approximately 6km south of Tarbert, Harris) and an existing substation on Lewis which lies approximately 3km south of Stornoway.

There are no trunk roads on the Isles of Lewis or Harris, therefore, the nearest trunk road to the site is the A87(T) at Uig on Skye, some 44km to the south-east.

Given the nature of the proposal and the distance to the nearest trunk road, Transport Scotland is satisfied that there will be no impact or material change to the trunk road network arising from the construction or the operation of the proposed OHL. We can confirm, therefore, that no further information is required in this regard.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact myself or alternatively, Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully

Redacted

Gerard McPhillips

**Transport Scotland
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

Marine Scotland Science advice on freshwater and diadromous fish and fisheries in relation to the installation of overhead line developments.

March 2022

Marine Scotland Science (MSS) provides internal, non-statutory, advice in relation to freshwater and diadromous fish and fisheries to the Scottish Government's Energy Consents Unit (ECU) for the installation and maintenance of overhead line (OHL) developments in Scotland.

Atlantic salmon (*Salmo salar*), sea trout and brown trout (*Salmo trutta*) are of high economic value and conservation interest in Scotland and for which MSS has in-house expertise. The route of OHLs often cross watercourses which support important salmon and trout populations. MSS aims, through our provision of advice to ECU, to ensure that the installation and maintenance of these OHLs do not have a detrimental impact on the fish habitat and populations.

The Electricity Works (Environmental Impact Assessment) (EIA) (Scotland) Regulations (2017) state that the EIA must assess the direct and indirect significant effects of the proposed development on water and biodiversity, and in particular species (such as Atlantic salmon) and habitats protected under the EU Habitats Directive. Salmon and trout are listed as priority species of high conservation interest in the Scottish Biodiversity List and support valuable recreational fisheries.

A good working relationship has been developed over the years between ECU and MSS, which ensures that these fish species are considered by ECU during all stages of the application process of OHL developments and are similarly considered during the installation and maintenance of future transmission lines. It is important that matters relating to freshwater and diadromous fish and fisheries, particularly salmon and trout, continue to be considered during the installation and maintenance of future OHLs.

In the current document, MSS sets out a revised, more efficient approach to the provision of our advice, which utilises our generic scoping and monitoring programme guidelines (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>). This standing advice provides regulators (e.g. ECU, local planning authorities), developers and consultants with the information required at all stages of the application process for OHL projects, such that matters relating to freshwater and diadromous fish and fisheries are addressed in the same rigorous manner as is currently being carried out and continue to be fully in line with EIA regulations. At the request of ECU, MSS will still be able to provide further and/or bespoke advice relevant to freshwater and diadromous fish and fisheries e.g. site specific advice, at any stage of the application process for a proposed development, particularly where a development may be considered sensitive or contentious in nature.

MSS will continue undertaking research, identifying additional research requirements, and keep up to date with the latest published knowledge relating to the

impacts of onshore wind farms on freshwater and diadromous fish populations. This will be used to ensure that our guidelines and standing advice are based on the best available evidence and also to continue the publication of the relevant findings and knowledge to all stakeholders including regulators, developers and consultants.

MSS provision of advice to ECU

- MSS should not be asked for advice on pre application and application consultations (including screening, scoping, gate checks and EIA applications). Instead, the MSS scoping guidelines and standing advice (outlined below) should be provided to the developer as they set out what information should be included in the EIA report;
- if new issues arise which are not dealt with in our guidance or in our previous responses relating to respective developments, MSS can be asked to provide advice in relation to proposed mitigation measures and monitoring programmes which should be outlined in the EIA Report (further details below);
- if new issues arise which are not dealt with in our guidance or in our previous responses, MSS can be asked to provide advice on suitable wording, within a planning condition, to secure proposed monitoring programmes, should the development be granted consent;
- MSS cannot provide advice to developers or consultants, our advice is to ECU and/or other regulatory bodies.
- if ECU has identified specific issues during any part of the application process that the standing advice does not address, MSS should be contacted.

MSS Standing Advice for each stage of the EIA process

Scoping

MSS issued generic scoping guidelines

(<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm and transmission line developments and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

If a developer identifies new issues or has a technical query in respect of MSS generic scoping guidelines then ECU should be informed who will then co-ordinate a response from MSS.

Gate check

The detail within the generic scoping guidelines already provides sufficient information relating to water quality and salmon and trout populations for developers at this stage of the application.

Developers will be required to provide a completed gate check checklist (annex 1) in advance of their application submission which should signpost ECU to where all matters relevant to freshwater and diadromous fish and fisheries have been presented in the EIA report. Where matters have not been addressed or a different approach, to that specified in the advice, has been adopted the developer will be required to set out why.

EIA Report

MSS will focus on those developments which may be more sensitive and/or where there are known existing pressures on fish populations (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/fishreform/licence/status/Pressures>). The generic scoping guidelines should ensure that the developer has addressed all matters relevant to freshwater and diadromous fish and fisheries and presented them in the appropriate chapters of the EIA report. Use of the gate check checklist should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process:

Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following:

- any designated area, for which fish is a qualifying feature, within and/or downstream of the proposed development area;
- the presence of a large density of watercourses;
- the presence of large areas of deep peat deposits;
- known acidification problems and/or other existing pressures on fish populations in the area; and
- proposed felling operations.

Post-Consent Monitoring

MSS recommends that regular visual inspections are carried out by the appointed Ecological Clerk of Works (ECoW) on all watercourses paying particular attention to watercourses during and after periods of prolonged precipitation, during the fish migration/spawning period and on watercourses which are downstream of watercourse crossings, where construction is carried out and where vehicular traffic is frequenting. All observations should be carefully recorded and monthly reports submitted to the Planning Authority. An action plan should be established which outlines proposed remediation procedures, should any changes occur. The developer should consider a water quality and/or fish population monitoring

programme particularly if the proposed development area is in a sensitive location e.g. includes a designated area for which fish are a qualifying feature. All proposed mitigation measures should be implemented and reviewed throughout the course of the development.

MSS has published guidance on survey/monitoring programmes associated with onshore wind farm developments (<https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren>) which developers should follow when drawing up survey and/or monitoring programmes.

If a developer considers that such a monitoring programme is not required then a clear justification should be provided.

Planning Conditions

MSS advises that planning conditions are drawn up to ensure appropriate provision for mitigation measures and monitoring programmes, should the development be given consent. We recommend that the appointment of an ECoW in overseeing the implementation of the proposed mitigation measures, the regular visual inspections of all watercourses and reporting of all observations is outlined within these conditions and that MSS is consulted on this.

Wording suggested by MSS in relation to the appointment of an ECoW for incorporation into planning consents:

1. No development shall commence unless the terms of appointment by the Company of suitably qualified (or equivalent) Ecological Clerk of Works (ECoW), in writing, to the Planning Authority for their written approval. Such approval may only be granted following consultation with Marine Scotland Science and any other advisors or organisations. The terms of appointment shall be to:
 - a. carry out regular visual inspections of all watercourses in line with Marine Scotland Science guidelines;
 - b. monitor compliance to all proposed site specific mitigation measures detailed in the Environmental Impact Assessment and in agreement with the Planning Authority and Marine Scotland Science; and
 - c. submit monthly reports to the Planning Authority and report to the Company's nominated construction project manager and consenting body any incidences of non-compliance with the ECoW works at the earliest practical opportunity.

The ECoW shall be appointed on the approved terms throughout the period from prior to commencement of the development (including enabling works), throughout the installation/maintenance period and during any period of restoration works.

Reason: To ensure effective monitoring of and compliance with the environmental mitigation and management measures associated with the Development.

Sources of further information

NatureScot (previously “SNH”) guidance on wind farm developments - <https://www.nature.scot/professional-advice/planning-and-development/advice-planners-and-developers/renewable-energy-development/onshore-wind-energy/advice-wind-farm>

Scottish Environment Protection Agency (SEPA) guidance on wind farm developments – <https://www.sepa.org.uk/environment/energy/renewable/#wind>

A joint publication by Scottish Renewables, SNH, SEPA, Forestry Commission Scotland, Historic Environment Scotland, MSS and Association of Environmental and Ecological Clerks of Works (2019) Good Practice during Wind Farm Construction - <https://www.nature.scot/guidance-good-practice-during-wind-farm-construction>.

Technical Appendix 4.3: Consultation Register

Consultee Name	Stage	Date	Topic	Consultee Comments	Response / Comment
Statutory					
ECU	Scoping Opinion	11/07/2022	Consultation	Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.	Each technical chapter contains a table which addresses all matters raised through consultation. In addition, this technical appendix summarises all responses.
			Consultation	Scottish Ministers are satisfied with the scope of the EIA as set out at Sections 4 to 13 of the scoping report.	Noted
			Hydrology	Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there are any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.	The Proposed Development passes through two Scottish Government Drinking Water Protection Areas (DWPA). Mitigation to protected water quality and quantity in these areas is set out in Section 10.8 of EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils .
			Hydrology	Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.	PWSs are discussed in section 10.5.15 of EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils , and shown in EIAR Volume 3a: Figure 10.10: Private Water Supplies . PWSs are assessed further in EIAR Volume 4: Technical Appendix 10.6: Private Water Supply Assessment .
			Ecology	MSS provide generic scoping guidelines for onshore wind farm and overhead line development which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.	Noted; however fish have been scoped out of the EIA, as detailed in Table 8.2 in EIAR Volume 2: Chapter 8: Ecology .
				In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.	While the Proposed Development crosses a number of watercourses, the design has aimed to locate poles further than 30 m from watercourses, where possible. The design and assessment of watercourse crossings is provided in Technical Appendix 10.4: Watercourse Crossing Assessment (EIAR Volume 4) . General mitigation measures to protect watercourses would be included within the CEMP and the Applicant's GEMPs (Technical Appendix 2.2, EIAR Volume 4), on the assumption of the presence of important ecological features (including fish and freshwater pearl mussel <i>Margaritifera margaritifera</i>) to avoid significant effects. Pollution control measures would be in place to protect watercourses and control the flow of any run-off from construction or operational activities, as described in Table 8.2 in EIAR Volume 2: Chapter 8: Ecology . No SACs where fish are a qualifying feature would be impacted by the Proposed Development.
				MSS also provide standing advice for overhead line development which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.	Noted, though fish have been scoped out of the EIA, as detailed in Table 8.2 in EIAR Volume 2: Chapter 8: Ecology .
			Peat	Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.	A PLHRA has been undertaken and is included in Technical Appendix 10.3: PLHRA (EIAR Volume 4) .
			SLVIA	Please note Comhairle nan Eilean Siar Planning Authority's response requesting an additional viewpoint for the landscape and visual impact assessment.	Noted. Based on the final alignment of the Proposed Development (which was amended post scoping), viewpoint 4 has been adjusted and is now located at Ardhasaig Pier. Viewpoint 17 was added to the SLVIA and is located at Pairc Land Raiders Cairn. Viewpoint locations are shown in EIAR Volume 3a: Figure 6.5: Visual Receptors, ZTV and Viewpoint Locations
			Consultation	Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.	Noted. The ECU has been kept informed of such relevant discussions via the Gatecheck process.
			Mitigation	The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	Each technical assessment chapter within EIAR Volume 2 contains a summary table detailing the significance of potential impacts and any relevant mitigation. A Schedule of Mitigation is also provided in EIAR Volume 2: Chapter 13: Schedule of Mitigation .
EIAR	The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 37 consent for the proposed development.	Noted			

				This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.	Noted. A list of cumulative developments considered in the technical assessments is provided in EIAR Volume 2: Chapter 12: Cumulative Effects .
			Consultation	It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this. Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.	Noted. The ECU has been kept informed of such relevant discussions via the Gatecheck process.
				When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.	Noted
					This appendix forms the tabular response to the issues raised in the Scoping Opinion, and each technical assessment in EIAR Volume 2 has summarised responses to the issues raised.
Comhairle nan Eilean Sia	Scoping response	06/07/2022	EIAR	CnES is in general agreement with the Issues scoped In and Out	Noted
			Proposed Development	It would be useful to have an additional figure that shows in detail (existing and proposed) the sections where the route is deviating from the current route (e.g. Ardhasaig)	Both the existing and proposed new OHLs are shown in EIAR Volume 3a: Figure 2.1: Proposed Development , which shows where the new OHL deviates from the existing.
			SLVIA	The Visual Receptors map has Core Footpaths incorrectly annotated as 'Highland Council' Core Paths. Access and Core paths. For clarity it should be noted the Hebridean Way and the Hebridean Cycleway are two separate routes. It is correct to state that the Hebridean Cycleway is no longer classified as National Cycle Route 780 and it is now classified by Sustrans as an "On the road route not on the cycle network"	Noted. The Outer Hebrides Core Path Plan (Adopted April 2010) has been used within the SLVIA assessment and has been corrected on the associated Figure 6.5 Visual Receptors, ZTV and Viewpoint Locations (EIAR Volume 3a)
			Decommissioning	It is suggested that Decommissioning should be identified as a stage notwithstanding the adopted position that effects should not exceed worst case of construction.	Noted. These two distinct routes have been assessed separately within the SLVIA chapter
			SLVIA (viewpoints)	It is suggested that given the planned deviation of the new line from the existing route that the following additional Viewpoint be added at Ardhasaig Pier or Site of Isle of Harris Distillery (IHD) Bonded warehouses (looking east towards the HV Line); Receptors - Villagers and potential visitors to the IHD Bonded Warehouses. It is suggested given the planning policy protection of Commemorative Sites that a viewpoint be added where the overhead line is in close proximity to the Pairc Land Raiders Cairn (on the moorland near the junction of the Eisgean Road with the main road).	Noted. Based on the final alignment of the Proposed Development (which was amended post scoping), viewpoint 4 has been adjusted and is now located at Ardhasaig Pier. Viewpoint 17 was added to the SLVIA and is located at Pairc Land Raiders Cairn. Viewpoint locations are shown in EIAR Volume 3a: Figure 6.5: Visual Receptors, ZTV and Viewpoint Locations
			Cultural Heritage	The Archaeology Service is content with the methodology proposed EIA Scoping Report.	Noted
			Ecology	The route of the proposal crosses through The Lewis Peatlands SPA Ramsar site Important Bird Areas and SSSI. Subject to the detailed input of NatureScot, the scope of the EIA report as proposed, is considered to be sufficient to assess the likely significant effects on the environment and biodiversity	Noted
			Ornithology	The route of the proposal crosses through The Lewis Peatlands SPA Ramsar site Important Bird Areas and SSSI. Subject to the detailed input of NatureScot, the scope of the EIA report as proposed, is considered to be sufficient to assess the likely significant effects on ornithological interests.	Noted
			Hydrology	Regard should be had to the generic Scottish Water advice for development being undertaken in or close to Drinking Water Protected Areas. Based on the scoping report I am satisfied with Private Water Supply (PWS) being scoped out of the EIA and satisfied with above proposals re Private Water Supply (PWS) CnES does not hold any flood risk information relevant to the EIAR. CnES is satisfied with the proposed approach for baseline collection, prediction and significance assessment for flood risk CnES is in agreement with the list of issues to be scoped with regards to flood risk	The Appointed Contractor would be responsible for reviewing all advice in detail when compiling the final CEMP. PWSs were scoped in and have been discussed in section 10.7.22 of EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils and assessed further in EIAR Volume 4: Technical Appendix 10.6: Private Water Supply Assessment .
			Traffic and Transport	CnES does not hold any environmental information relevant to the EIA for roads We are satisfied with the proposed approach for baseline collection, prediction and significance assessment for roads There are some specific issues CnES would look at when more detailed information is available (proximity to existing carriageway, construction on steep terrain above live carriageway etc) which we assume will be assessed in the traffic and transport chapter. During the construction phase any poles/stays should be a min 7m from the main road edge. CnES is in agreement with the list of issues to be scoped out with regards to roads	Noted Noted Noted Noted
			SLVIA	The information provided by the developer is adequate and is considered to be sufficient to assess the likely significant effects to public access and the long distance routes.	Noted
			Noise & Vibration	Based on the scoping report CnES is satisfied with Noise and Vibration being scoped out of the EIA.	Noted
			Noise & Vibration	Based on the scoping report CnES is satisfied with Construction Noise being scoped out of the EIA.	Noted
			Air Quality	Based on the scoping report CnES is satisfied with Air Quality being scoped out of the EIA.	Noted

BNG	The Comhairle welcomes the developers approach, noting that a key part of the Applicant's Sustainability Strategy is to achieve Biodiversity Net Gain (BNG) as part of project delivery. As such, the ambition is to ensure that activities not only maintain the balance that exists but enhance the biodiversity in the area.	Noted
Planning	Regard should be afforded to the relevant provisions of National Planning Framework (NPF3) and Scottish Planning Policy (SPP), noting that the Draft NPF4 has been published and sets out how the Scottish Government's approach to planning and development will help to achieve a net zero, sustainable Scotland by 2045; it will include 35 national planning policies which will replace those currently found in the Scottish Planning Policy, as well as other relevant national policy guidance and the provisions of the Outer Hebrides Local Development Plan (OHLDP) and the statutory Supplementary Guidance for Wind Energy Developments (Wind Energy SG).	A Planning Statement is submitted in support of the Section 37 application to Scottish Ministers. The Planning Statement provides a detailed assessment of the Proposed Development against the provisions of relevant local and national planning policy and guidance including those identified by Comhairle nan Eilean Siar. The Environmental Impact Assessment has also been prepared with due regard to the relevant policies and guidance.
Programme	A schedule outlining the proposed phasing of the construction and the decommissioning and removal of the existing OHL would be helpful to include.	Details of the proposed phasing of construction of the new OHL and dismantling of the existing OHL are included within EIAR Volume 2: Chapter 2: Description of Proposed Development .
SLVIA	Development Strategy The overhead line passes through both 'rural settlement' and 'outwith settlement' areas as defined in LDP Policy DS1. Within 'rural settlement' the principal policy objective is to accommodate development to meet sustainable growth for local needs, particularly for residential, agriculture, tourism and service activities. Development proposals will be assessed against a siting and design appropriate to the established rural character and settlement pattern of the local area.	Noted
Planning SLVIA	In 'outwith settlement' areas as defined in Pol DS1 where 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 proposal is not a LDP proposal site, the EIA Report must demonstrate a justified need for the proposed development in the location (Pol DS1) and as such the principle of development in that location is considered appropriate, subject to satisfying all other LDP policies.	Details of the project need are contained in EIAR Volume 2: Chapter 1: Introduction .
	The proposed development crosses numerous landscape character types, which differ slightly from the EIA due to the updated assessment by SNH 2019. These include Gently Sloping Crofting, Rocky Moorland – Outer Hebrides, Linear Crofting and Boggy Moorland – Outer Hebrides. Indirect relevant landscape character types could also include Prominent Hills and Mountains. Policy NBH1 states that 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 note that the EIA will incorporate the LCA updated by Scottish Natural Heritage (rebranded NatureScot) in 2019. Consideration of micro siting of trident poles to minimise visual intrusion on key views should be a consideration in the EIA LVIA.	Noted. A detailed assessment of the impact of the Proposed Development on the Landscape Character Areas and Seascape Character Areas has been undertaken, and is presented in detail within Appendix 6.4: Residual Effects on Designated and Classified Landscapes (EIAR Volume 4) . Moreover, EIAR Volume 2: Chapter 6: SLVIA , Section 6.9: Mitigation sets out imbedded mitigation to reduce the number of potential significant effects.
	There is a Garden and Designed Landscape (GDL) Lews Castle and Lady Lever Park to the north of the proposed development, consideration of any residual effects on this designated site should be addressed by the EIA.	Noted. Lews Castle and Lady Lever Park GDL has been included within the SLVIA assessment. A detailed assessment has been undertaken, which is detailed in Appendix 6.4: Residual Effects on Designated and Classified Landscapes (EIAR Volume 4) .
	The route passes through (30) Eisgein Wild Land Area and (31) Harris-Uig Hills Wild Land Area. The EIA should assess whether the proposal will have any unacceptable adverse effects on Wild Land and if required, propose mitigation measures such as undergrounding power lines in sensitive areas.	Noted. The impacts on the two Wild Land Areas within the Study Area which include Eisgein and Harris – Uig Hill have been assessed within the SLVIA and are presented in Appendix 6.6: Wild Land Impact Assessment (EIAR Volume 4) .
Ecology	Policy NBH2 states that Development which is likely to have a significant effect on a Natura site and is not directly connected with or necessary to the conservation management of that site will be subject to an Appropriate Assessment by the Comhairle.	No likely significant effects are predicted on a Natura site, therefore an Appropriate Assessment is not required.
Ornithology	It is noted that following desk based research, the developer considers that an HRA screening assessment of the proposal in relation to the potential for significant effects on the Lewis Peatlands SPA, the North Harris Mountains SPA and the West Coast of the Outer Hebrides SPA will be required. Where there is good reason to suggest that a European Protected Species (EPS) is present on site, or may be affected by a proposed development, the Comhairle will require any such presence to be established and, if necessary, a mitigation plan provided to avoid or minimise any adverse impacts on the species, prior to determining the application.	Noted.
	The EIA is required to assess impacts on ornithology, particularly in relation to phasing works to avoid breeding season disturbance avoiding construction (and decommissioning) during the breeding season (February to July), potentially undergrounding the power lines in the vicinity of highly sensitive species providing proven mitigation measures such as bird diverters to minimize collision risks.	Mitigation is discussed in section 9.8 Mitigation of Chapter 9: Ornithology (EIAR Volume 2) .
Cultural Heritage	The overhead line is near the Pairc Land Raiders Cairn. Policy NBH4 Built Heritage states that the Comhairle will seek to manage the special architectural, historic and cultural interest of war memorials and commemorative sites of local importance. Any site features which are known to have been formally dedicated as a memorial to a person or event will be deemed to have commemorative significance. In addition, any site with features which are widely understood to be closely associated with a person or event may be considered to have commemorative significance. Due to the inherent value and cultural significance of the landscape in relation to the monument, consideration of the effects of the proposal on the monument and its landscape setting and whether mitigation is required to minimise visual intrusion on the landscape setting of the monument. The EIA should identify any other built heritage designations and assess whether the OHL will have unacceptable adverse effects on these and their setting.	Noted. A discussion of the potential effect on the setting of Pairc Land Raiders Cairn is included in Chapter 7: Cultural Heritage (EIAR Volume 2) , Section 7.7 and summarised in Technical Appendix 7.2 (EIAR Volume 4) . A tabulated assessment of effects on the setting of designated assets, including built heritage, is included in Technical Appendix 7.2 (EIAR Volume 4) .

			SLVIA	The proposed OHL follows the route of the Hebridean Way walking and on-road cycling route along the A859 from Luirbost in Lewis to Groscllett in Harris. In addition, several core paths are located within one kilometre of the proposed development, the OHL also crosses the Aline Woodland Walks. Consideration should be given in the EIA of opportunities for the access routes required for the development to contribute to improvements to, and expansion of the existing path network (including the improvement of access to the Core Path network and Hebridean Way).	Noted
			Peat	Development should be designed to minimise adverse impacts on soils caused by ground disturbance, compaction or excavation. Developers should assess the likely effects associated with any development work on soils, particularly machair soil, peat, or other carbon-rich soils and associated vegetation, and aim to mitigate any adverse impacts arising. It is recognised that while a significant quantity of peat is proposed to be excavated, the proposal intends to limit the scope for significant adverse effects through reuse and site restoration and that a Peat Landslide Hazard Risk Assessment (PHLRA) will be carried out and a Peat Management Plan (PMP) will be required be provided should any deemed planning consent be given. Provision of a EcoW will also be a requirement from the start of the construction phase and throughout the project to manage storage and reinstatement of soil and peat.	Noted. These factors have been considered through the design and assessment, and are included in Chapter 2: Description of Proposed Development (EIAR Volume 2), Technical Appendix 2.2: GEMPs, Technical Appendix 10.2: OPMP, Technical Appendix 10.3: PLHRA, (EIAR Volume 4) . A detailed CEMP will be completed by the appointed Contractor post-consent, which will also include the appointment of an EcoW.
			Forestry / BNG	In order to minimise any adverse impacts on amenity, biodiversity or landscape value, developers will be required to incorporate existing trees and woodland into developments through sensitive siting and design. Where loss is unavoidable, appropriate replacement planting should be sought through the use of planning conditions or through a legal agreement if appropriate. The EIA should provide appropriate information to aid assessment of this matter. It is noted that a key part of the Developer's Sustainability Strategy is to achieve Biodiversity Net Gain (BNG) as part of project delivery. As such, the ambition is to ensure that activities not only maintain the balance that exists but enhance the biodiversity in the area. To address compensatory planting in accordance with the Scottish Government's Control of Woodland Removal Policy it is recommended that to encourage biodiversity and mitigate against the loss of forestry that native species are planted and that a Habitat Management Plan is provided to facilitate this purpose.	An Outline Habitat Management Plan is provided in Technical Appendix 8.2 (EIAR Volume 4) , which has the following objectives: - to restore and enhance peatland habitat within the field survey area and/or surrounding suitable habitat; - to mitigate for woodland habitat loss through compensatory planting of a minimum of 3.26 ha of broadleaved and mixed woodland; and - to seek to further enhance the field survey area, where possible, through the creation of artificial refugia for slow worm.
			Waste	We also recommend that any felled trees and brash that is not commercially viable is dealt with in a sustainable manner and in compliance with LDP policy EI 4 on waste management. Preparation of a Site Waste Management Plan will be required to accompany proposals for developments involving significant demolition works, this policy will apply to the dismantling of the existing line.	Noted. After felling, any non-commercially viable forest material would be dealt with in a way that delivers the best practicable environmental outcome and is compliant with LDP policy EI 4: Waste Management, as set out in EIAR Volume 2: Chapter 2: Description of Proposed Development .
			Hydrology	SEPA flood maps indicate small pockets of potential surface water flooding on site. Policy EI7: Development proposals should avoid areas susceptible to flooding and promote sustainable flood management. It is noted that a Sustainable Drainage System is proposed for the development. Development proposals should avoid adverse impact on the water environment. There are two Drinking water Protection Areas (DWPS) on the route of the proposed development at Bowglass DWPA and at Maarraig DWPA, the EIA must demonstrate that these will be protected, and any potential effects of contamination or pollution minimised and mitigated against. A minimum buffer strip of six metres should be incorporated between any water body and proposed development to enable access and maintenance all year round. We note that the Hydrology and Hydrogeology assessment will include a Private Water Supply Risk Assessment as an appendix which will identify private water supplies or other abstractions within 250m of pole locations, or 100m of temporary access tracks, this report must demonstrate how abstractions will be protected in accordance with SEPA guidance (LUPS-GU31). The proposal should demonstrate no significant effects both during construction and after completion on the water quality in groundwater, adjacent watercourses or areas downstream; existing groundwater abstractions within 250m; and water quality and natural flow patterns and sediment transport processes in all water bodies.	Surface water flood risk is discussed in section 10.2.11 of EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils . Micrositing of infrastructure outwith areas of potential flood risk would be considered at detailed design. The Proposed Development would incorporate the use of SuDS to manage potential flood risk. Details of construction phase SuDS would be included in the PPP and final CEMP that would be compiled by the Appointed Contractor. A full SuDS solution would be developed prior to construction. Mitigation to protect water quality and quantity are set out on section 10.8 of of EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils and the need for buffer strips noted in section 10.8.13. Pollutant and sediment control measures would be detailed in the final CEMP and PPP that would be compiled by the Appointed Contractor. EIAR Volume 4: Technical Appendix 10.5: Private Water Supply Assessment has assessed in further detail all PWSs within 250 m of the Proposed Development. Section 10.9 of EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils has assessed the residual effects on PWSs, and pre and post construction monitoring of PWSs will be conducted.
	Gatecheck process response	24/08/2022	EIAR	CNES is satisfied with what is being proposed in addressing the issues raised in our scoping consultation response. No further information required.	Noted
SEPA	Scoping response	17/06/2022	Development Description	A map of the site layout must be provided on an adequate scale map. Each of the maps must detail all proposed upgraded, temporary and permanent site infrastructure. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.	EIAR Volume 3a: Figure 2.1: Proposed Development shows a map of the Proposed Development and Limits of Deviation. This map includes the proposed access routes and pole locations, and details of proposed temporary infrastructure is provided in EIAR Volume 2: Chapter 2: Description of Proposed Development .
			GWDTE	Avoiding good quality or rare GWDTE habitats and minimising impacts on other GWDTE habitats must be addressed into the EIAR.	Impacts to GWDTEs are considered in detail in EIAR Volume 4: Technical Appendix 10.5: Groundwater Dependent Terrestrial Ecosystem Assessment . In addition, direct impacts to sensitive habitats are covered in EIAR Volume 2: Chapter 8: Ecology .

Hydrology	Avoiding impacts on watercourses and other water features by ensuring suitable buffers and using best practice design crossings must be addressed in the EIAR.	Whilst the preferred 50 m buffer is acknowledged, it has not been possible to avoid a 50 m buffer along the entire Proposed Development. This is a result of engineering constraints which include constraints to achieve the required clearances on the OHL spans. The majority of poles have been located outwith a 30 m buffer of watercourses, and many of the water features are smaller burns (EIAR Volume 3a: Figure 10.1: Surface Water Features). Based on previous experience, a 30 m buffer is considered a suitable distance to avoid impacts on watercourses and lochs. Design of watercourse crossings would be the responsibility of the Appointed Contractor and would adhere to the appropriate CIRIA and SEPA guidance as set out in section 11.2.12 of EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils .
Peat	Minimising impacts on peat and peatland must be addressed in the EIAR.	The layout of the Proposed Development has, as far as possible, been designed to avoid habitats of highest ecological importance and highest sensitivity to impacts as detailed in EIAR Volume 2: Chapter 2: Description of Proposed Development . This includes priority peatland habitat. Mitigation measures are discussed in EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils .
Hydrology	The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:	The interaction of the Proposed Development with the water environment is shown in EIAR Volume 3a: Figure 10.1: Surface Water Features . Watercourse crossing locations are discussed further in Volume 4: Technical Appendix 10.4: Watercourse Crossing Assessment and shown in EIAR Volume 4: Figure 10.4.1 .
	All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.	Shown in EIAR Volume 3a: Figure 10.5: Surface Water Features .
	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.	Whilst the preferred 50 m buffer is acknowledged, it has not been possible to avoid a 50 m buffer along the entire Proposed Development. This is a result of engineering constraints which include constraints to achieve the required clearances on the OHL spans. The majority of poles have been located outwith a 30 m buffer of watercourses, and many of the water features are smaller burns EIAR Volume 3a: Figure 10.1: Surface Water Features . Based on previous experience, a 30 m buffer is considered a suitable distance to avoid impacts on watercourses and lochs.
	Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.	The Appointed Contractor would be responsible for drafting detailed drainage plans prior to construction.
	If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.	The Appointed Contractor would be responsible for providing this information to SEPA prior to construction.
	Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application.	Design of watercourse crossings would be the responsibility of the Appointed Contractor and would adhere to the appropriate CIRIA and SEPA guidance as set out in section 10.2.12 of EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils . A Watercourse Crossing Assessment is included as EIAR Volume 4: Technical Appendix 10.4 .
Peat	The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO2 and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.	Noted. This has been documented as part of EIAR Volume 2: Chapter 2: Development Description and EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology & Soils where this has been practicable. It should be noted that the alignment design was mature prior to commencement of peat surveys.
	The EIAR must include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's guidance on Developments on Peatland - Peatland Survey (2107) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as GWDTEs.	A detailed map of peat depths is provided in EIAR Volume 3a: Figure 10.4: Peat Depth Plan . The locations of habitats with a potential to be GWDTE are shown in EIAR Volume 3a: Figure 10.10: Groundwater Dependent Terrestrial Ecosystems – NVC , and Figure 10.11: Hydrological Assessment of Groundwater Dependent Terrestrial Ecosystems . Private water supply abstractions are shown in Figure 10.12: Private Water Supplies (EIAR Volume 3a) .
	The EIAR must include a table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.	This table is included in EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils . How peat will be kept permanently wet will be the responsibility of the appointed Contractor, which is outlined in EIAR Volume 4: Technical Appendix 10.2: Outline Peat Management Plan .

			<p>To avoid delay and potential objection proposals must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste and our Developments on Peat and Off-Site uses of Waste Peat.</p>	Noted.
			<p>Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.</p>	EIAR Volume 4: Technical Appendix 10.2: Outline Peat Management Plan.
		GWDTE	<p>A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.</p> <p>If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.</p>	<p>Shown in EIAR Volume 3a: Figure 10.8: Groundwater Dependent Terrestrial Ecosystems-National Vegetation Classification and Figure 10.9: Hydrological Assessment of Groundwater Dependent Terrestrial Ecosystems.</p> <p>A detailed assessment of GWDTEs has been provided in EIAR Volume 4: Technical Appendix 1.6: Groundwater Dependent Terrestrial Ecosystems Assessment. The Appointed Contractor would be responsible for undertaking a pre-construction detailed site specific risk assessment of any sensitive habitats, and supplying this to SEPA. The Appointed Contractor would also be</p>
		Groundwater Abstractions	<p>Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:</p> <p>a) A map demonstrating that all 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. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.</p> <p>If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.</p>	<p>PWS location are shown in EIAR Volume 3a: Figure 10.10: Private Water Supplies. A detailed assessment of PWSs have been provided in EIAR Volume 4: Technical Appendix 10.6: Private Water Supply Assessment.</p> <p>The Appointed Contractor would be responsible for undertaking detailed pre-construction PWS surveys, and implementing mitigation (set out in EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils and EIAR Volume 4: Technical Appendix 10.6: Private Water Supply Assessment.</p>
		Borrow Pits	<p>Scottish Planning Policy states (Paragraph 243) that "Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place." The submission must provide sufficient information to address this policy statement.</p> <p>If borrow pits are proposed the following information should also be submitted:</p> <p>a) A map showing the location, size, depths and dimensions of each pit.</p> <p>b) Justification for the proposed location of each borrow pit and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.</p> <p>c) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. 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, drawings of what is proposed in terms of engineering works.</p>	No borrow pits have been proposed at this stage. The need for borrow pits would be identified by the Appointed Contractor and, if required, details of the proposed locations, dimensions and justification for borrow pits would be provided to SEPA.
		Mitigation	<p>A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer.</p>	The schedule of mitigation is set out in EIAR Volume 2: Chapter 13 as well as being detailed within the individual technical chapters and their supporting figures (EIAR Volume 3a).
Gatecheck process response	23/08/2022	Hydrology and Soils; Ecology	<p>The gatecheck 1 report does not provide information on how the advice given at the scoping stage has been taken into consideration in the development of the project but it does explain the evolution of the project in relation to the preferred route and potential alternative options. The choices made seem reasonable but without the background environmental information it is not possible to comment further.</p> <p>We would welcome further engagement with the project at or before the second gatecheck in the form of detailed layout plans (showing new permeant and temporary infrastructure and existing infrastructure that will be used as part of the works) overlain peat probing, NVC habitats and watercourse buffers information. In relation to watercourse buffers we highlight now (which we appreciated we did not at the scoping stage) that it is usual to include 50 m rather than 30 m buffers to water features when considering layout and potential impacts.</p>	Noted Proposed layout plans have been provided to SEPA, overlain on peat depth information, NVC habitats and surface water features, for further comment.

NatureScot	Scoping response	13/06/2022	Ornithology	<p><u>Lewis Peatlands Special Protection Area (SPA)</u></p> <p>We advise that the proposed works are likely to have a significant effect on the qualifying features of the SPA. Our reasons for this advice are:</p> <ul style="list-style-type: none"> > Collision risk to qualifying bird species from overhead lines once constructed > Potential disturbance to qualifying bird species during construction, particularly during the breeding season > Loss and damage to habitats which support qualifying bird species <p>It is our advice therefore that an appropriate assessment is required and the ES should provide information needed to allow the Scottish Government to carry out this appropriate assessment. The loss and damage to the blanket bog, heath and other habitats which support qualifying bird species should be quantified in the ES. This will require NVC survey data.</p>	Collision risk modelling and potential disturbance are discussed in Chapter 9: Ornithology (EIAR Volume 2) . A Habitat Regulations Appraisal (HRA) has been undertaken and is included in Technical Appendix 9.3: Habitats Regulation Appraisal (EIAR Volume 5) . Habitat loss numbers have been taken from Chapter 8: Ecology (EIAR Volume 2) and based on NVC survey data.
			Ecology	<p><u>Lewis Peatlands Special Area of Conservation (SAC)</u></p> <p>It is SNH's view that the proposed works are not likely to have a significant effect on the qualifying features of the SAC. Our reasons for this advice are:</p> <ul style="list-style-type: none"> > the distance between the proposed works and the habitat features of the site > weak hydrological connections between the site and the habitat features of the site > low risk of impacts on the other qualifying features of the SAC once standard mitigation techniques are applied <p>Protected Species</p> <p>The proposals for protected species surveys, impact assessment and mitigation are appropriate. The most important bird species to consider will be breeding divers, raptors and waders, including the recently established hen harries population SW of Stornoway. Risks of disturbance, displacement and collision should be assessed and quantified as far as possible.</p> <p>Other Habitats and Species</p> <p>NatureScot recommends that all peatland habitats within the survey corridor should be mapped to NVC standards. This is because the NVC is more sensitive to the hydrological variation which occurs in blanket bog than is Phase 1, and this will be important in determining construction methods and mitigation measures.</p>	<p>The EcIA assessment concludes that the Proposed Development would not have a significant effect on the Lewis Peatlands SAC, as detailed in section 8.8 (Chapter 8: Ecology, EIAR Volume 2) and in Technical Appendix 8.1: Ecology Methodology and Results (EIAR Volume 4).</p> <p>Protected Species</p> <p>No response required for ecological protected species. Ornithological species are considered in Chapter 9.</p> <p>Other Habitats and Species</p> <p>NVC surveys were undertaken for all potential bog habitats, to allow this assessment of hydrological variation to be undertaken (EIAR Volume 2: Chapter 8: Ecology).</p>
			SLVIA	<p>Landscape and Visual Effects</p> <p>South Lewis, Harris and North Uist National Scenic Area (NSA)</p> <p>The proposed line overlaps the northern part of the NSA. Effects on the special qualities of the NSA should be assessed, to help inform an assessment of impacts on the overall integrity of the area.</p> <p>We recommend that the cumulative landscape and visual impact assessment should include developments which are subject to valid applications as well as those which are constructed and approved.</p>	<p>Noted. The South Lewis, Harris and North Uist National Scenic Area has been included within the SLVIA, detailed within Appendix 6.4: Residual Effects on Designated and Classified Landscapes (EIAR Volume 4). Cumulative developments that have been included within SLVIA are detailed in Table 6.8 of Chapter 6: SLVIA (EIAR Volume 2) and include existing, in-planning and consented developments within 10 km of the Proposed Development.</p>
HES	Scoping response	07/06/2022	Cultural Heritage	<p>As the scoping report notes, in our previous correspondence regarding potential impacts on our historic environment interests (dated 24 March 2022) we noted the proximity of the preferred alignment to the scheduled monument Druiem Dubh stone circle (SM 5504). We therefore welcome that the scoping report has recognised the need to assess the potential for impacts on the setting of this site and offer mitigation where appropriate. We also welcome the commitment to provide a visualisation from this site to support the assessment as requested in our previous consultation.</p> <p>In terms of the proposed approach to the assessment in general we note that an appropriate baseline has been identified and note that off-line construction access routes will also be assessed as well as the inner and outer study areas.</p>	<p>Impacts and any mitigation required against potential effects on the scheduled monument Druiem Dubh stone circle are addressed in Chapter 7: Cultural Heritage (EIAR Volume 2).</p> <p>Noted</p>
			Cultural Heritage	<p>We welcome the recognition within the Gatecheck Report that the potential for impacts on the scheduled monument Druiem Dubh stone circle (SM5504) is a key issue that has been identified in the development of this proposal. Furthermore, we welcome the consideration given to this issue through the identification of an alignment deviation as laid out in the report.</p> <p>We are therefore content that our comments at earlier stages of the development of proposals have been taken into account. In presenting the assessment findings in the forthcoming EIAR, as we noted in our responses of 24 March 2022 and 07 June 2022, we would wish to see a visualisation from the above monument in order to support the assessment.</p>	Noted. Assessment of potential impacts on Druiem Dubh stone circle (SM5504) is provided in EIAR Volume 2: Chapter 7: Cultural Heritage , with a visualisation provided on Figure 7.2 (EIAR Volume 3b) .
Scottish Forestry	Scoping Response	12/06/2022	Forestry	<p>As the proposed development area includes woodland, SF recommends that all impacts on woodland are set out in one section of the Environmental Impact Assessment Report (EIA Report) for the proposed development.</p> <p>Any woodland removal for development purposes will be subject to the Scottish Government's Policy on Control of Woodland Removal (CoWRP). This policy seeks to avoid the removal of woodland, but where permanent removal is essential for development purposes the area must be replaced elsewhere by compensatory planting. The EIA Report should set out how this policy has been applied and quantify any permanent woodland removal.</p> <p>Any proposed compensatory planting areas will be the subject of the Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017, and therefore a separate application will be required to be submitted to SF for a formal opinion on whether consent is required.</p>	<p>Technical Appendix 2.4: Woodland Plans (EIAR Volume 4) contains details of the likely impacts on woodland, including felling and restocking areas.</p> <p>The Proposed Development would result in the permanent loss of woodland, and the Applicant is committed to making arrangements to plant off-site the equivalent area of woodland as Compensatory Planting, meeting the Scottish Government's CoWRP objective of no net loss of woodland.</p> <p>Technical Appendix 2.4: Woodland Plans (EIAR Volume 4) contains details of the felling and restocking areas as part of the Proposed Development.</p> <p>Noted</p>

				Any additional felling which is not part of the planning application will require permission from SF under the Forestry and Land Management (Scotland) Act 2018 (the Act). For areas covered by an approved Long Term Forest Plan (LTFP), the request for additional felling (and subsequent restocking) areas needs to be presented in form of LTFP amendment.	Noted
				All proposed compensatory planting, felling and restocking proposals need to be compliant with requirements of UK Forestry Standard (UKFS).	Noted
Non-Statutory					
British Horse Society	Scoping response	18/05/2022	Transport, Access and Recreation	Horses are important and good for people so their safety and capacity to access safe off road hacking is a key consideration in terms of their welfare and the wellbeing of their riders and those who look after them. [The response referred to] the importance of off-road riding opportunities; horse and rider safety on the road network; the rights of access under the Land Reform (Scotland) Act for horse riders; and economic contributing of equestrianism to the Scottish economy (equestrianism is worth £650 million to the Scottish economy annually with the Scottish Racing industry contributing £300 million and the rest of the industry generating £355 million).	Noted. Impacts to access and recreational routes are covered in Chapter 6: Seascape, Landscape and Visual Impact Assessment (EIAR Volume 2) . Mitigation measures to address the potential impact of construction traffic on horses and riders is proposed in the form of a Path Management Plan, as detailed in Chapter 11: Traffic and Transport (EIAR Volume 2) .
Crown Estates Scotland	Scoping response	15/06/2022	Marine Environment	Crown Estate Scotland assets are not affected by this proposal and CES has no comments to make.	Noted
HIAL Safeguarding	Scoping response	17/06/2022	Aviation	With reference to the above, our calculations show that, at the given position and height, this development would not infringe criteria for Stornoway Airport. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.	Noted
Joint Radio Company	Scoping response	09/06/2022	Communications	JRC does not have any concerns regarding Harris - Stornoway OHL.	Noted
Maritime and Coastguard Agency	Scoping response	17/06/2022	Navigation	The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. We would expect the impact of works in or over the marine environment to be subject to an appropriate navigation risk assessment to consider the risks to shipping and navigation. From the information provided it is my understanding that the works falls outside of the marine environment, and all works associated with the replacement project are on land. As there is no potential for impact on the marine environment as far as we can see from the proposals, there is no requirement for MCA to assess the risks to shipping and navigation on this occasion.	Noted
NATS Safeguarding	Scoping response	31/05/2022	Aviation	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	Noted
Office for Nuclear Regulation	Scoping response	06/06/2022	Nuclear	With regard to planning application ECU00004490, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.	Noted
RSPB Scotland	Scoping response	16/06/2022	Ornithology	RSPB does not intend to provide comment.	Noted
Scottish Water	Scoping response	27/05/2022	Hydrology	Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced.	The Appointed Contractor will be responsible for detailed drainage design and liaising with Scottish Water on the design.
				Scottish Water has carried out a capacity review and can confirm there is currently sufficient capacity in the North Lochs Water Treatment Works to service your development. However, please note that further investigations may be required to be carried out once a formal application has been submitted.	The Appointed Contractor will be responsible for detailed drainage design and liaising with Scottish Water on the design.
				There is currently sufficient capacity for a foul only connection in the Balallan Waste Water Treatment Works to service your development. However, please note that further investigations may be required to be carried out once a formal application has been submitted.	The Scottish Government DWPA mapping and CEnS identified there are two DWPAs on the route of the Proposed Development at Bowglass and Maaruiig. These have been considered in EIAR Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils .
				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.	The Appointed Contractor will be responsible for detailed drainage design and should take this into consideration.
				For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges. In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.	The Appointed Contractor would be responsible for detailed drainage design and submitting any applications to Scottish Water.
				All proposed developments require to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water via our Customer Portal prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.	The Appointed Contractor would be responsible for detailed drainage design and submitting any applications to Scottish Water.
Transport Scotland	Scoping response	14/06/2022	Transport	There are no trunk roads on the Isles of Lewis or Harris, therefore, the nearest trunk road to the site is the A87(T) at Uig on Skye, some 44km to the south-east. Given the nature of the proposal and the distance to the nearest trunk road, Transport Scotland is satisfied that there will be no impact or material change to the trunk road network arising from the construction or the operation of the proposed OHL. We can confirm, therefore, that no further information is required in this regard.	Noted

Marine Scotland Science (MSS)	Scoping response	Mar-22	Fish	<p>Atlantic salmon (<i>Salmo salar</i>), sea trout and brown trout (<i>Salmo trutta</i>) are of high economic value and conservation interest in Scotland and for which MSS has inhouse expertise. The route of OHLs often cross watercourses which support important salmon and trout populations. MSS aims, through our provision of advice to ECU, to ensure that the installation and maintenance of these OHLs do not have a detrimental impact on the fish habitat and populations.</p>	Noted
				<p>The Electricity Works (Environmental Impact Assessment) (EIA) (Scotland) Regulations (2017) state that the EIA must assess the direct and indirect significant effects of the proposed development on water and biodiversity, and in particular species (such as Atlantic salmon) and habitats protected under the EU Habitats Directive. Salmon and trout are listed as priority species of high conservation interest in the Scottish Biodiversity List and support valuable recreational fisheries.</p>	<p>While the Proposed Development crosses a number of watercourses, the design has aimed to locate poles further than 30 m from watercourses, where possible. The design and assessment of watercourse crossings is provided in Technical Appendix 10.4: Watercourse Crossing Assessment (EIA Volume 4). General mitigation measures to protect watercourses would be included within the CEMP and the Applicant's GEMPs (Technical Appendix 2.2, EIA Volume 4), on the assumption of the presence of important ecological features (including fish and freshwater pearl mussel <i>Margaritifera margaritifera</i>) to avoid significant effects. Pollution control measures would be in place to protect watercourses and control the flow of any run-off from construction or operational activities, as described in EIA Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils.</p>
				<p>Developers will be required to provide a completed gate check checklist (annex 1) in advance of their application submission which should signpost ECU to where all matters relevant to freshwater and diadromous fish and fisheries have been presented in the EIA report. Where matters have not been addressed or a different approach, to that specified in the advice, has been adopted the developer will be required to set out why.</p>	<p>Justifications for scoping out aquatic ecology are provided in Table 8.2 in EIA Volume 2: Chapter 8: Ecology.</p>
				<p>MSS will focus on those developments which may be more sensitive and/or where there are known existing pressures on fish populations</p>	Noted
				<p>The generic scoping guidelines should ensure that the developer has addressed all matters relevant to freshwater and diadromous fish and fisheries and presented them in the appropriate chapters of the EIA report. Use of the gate check checklist should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process</p>	<p>Noted, though fish have been scoped out of the EIA, as detailed in Table 8.2 in EIA Volume 2: Chapter 8: Ecology.</p>
				<p>Developers should specifically discuss and assess potential impacts and appropriate mitigation measures associated with the following: > any designated area, for which fish is a qualifying feature, within and/or downstream of the proposed development area; > the presence of a large density of watercourses; > the presence of large areas of deep peat deposits; > known acidification problems and/or other existing pressures on fish populations in the area; and > proposed felling operations.</p>	<p>While the Proposed Development crosses a number of watercourses, the design has aimed to locate poles further than 30 m from watercourses, where possible. The design and assessment of watercourse crossings is provided in Technical Appendix 10.41: Watercourse Crossing Assessment (EIA Volume 4). General mitigation measures to protect watercourses would be included within the CEMP and the Applicant's GEMPs (Technical Appendix 2.2, EIA Volume 4), on the assumption of the presence of important ecological features (including fish and freshwater pearl mussel <i>Margaritifera margaritifera</i>) to avoid significant effects. Pollution control measures would be in place to protect watercourses and control the flow of any run-off from construction or operational activities, as described in EIA Volume 2: Chapter 10: Hydrology, Hydrogeology, Geology and Soils.</p>
				<p>MSS recommends that regular visual inspections are carried out by the appointed Ecological Clerk of Works (ECoW) on all watercourses paying particular attention to watercourses during and after periods of prolonged precipitation, during the fish migration/spawning period and on watercourses which are downstream of watercourse crossings, where construction is carried out and where vehicular traffic is frequenting. All observations should be carefully recorded and monthly reports submitted to the Planning Authority. An action plan should be established which outlines proposed remediation procedures, should any changes occur. The developer should consider a water quality and/or fish population monitoring programme particularly if the proposed development area is in a sensitive location e.g. includes a designated area for which fish are a qualifying feature. All proposed mitigation measures should be implemented and reviewed throughout the course of the development.</p>	<p>An ECow would undertake visual inspections of watercourses as and when required during construction, and submit reports to the Planning Authority, where relevant, though monthly reporting is unlikely to be required due to the protective 30 m watercourse buffer and the small number of watercourse crossings proposed, as detailed in Technical Appendix 10.4: Watercourse Crossing Assessment (EIA Volume 4). It is not considered that a water quality and/or fish population monitoring programme is required as the Proposed Development is not in a sensitive location, such as within a designated site for fish species. However, water quality monitoring of the Allt Baca Ghail, which would be crossed by the Proposed Development, would be undertaken prior to construction to establish a baseline.</p>
				<p>MSS has published guidance on survey/monitoring programmes associated with onshore wind farm developments which developers should follow when drawing up survey and/or monitoring programmes.</p>	<p>Survey/monitoring programme not required here.</p>
				<p>If a developer considers that such a monitoring programme is not required then a clear justification should be provided.</p>	<p>Justifications for scoping out aquatic ecology are provided in Tables 8.1 and 8.2 in EIA Volume 2: Chapter 8: Ecology.</p>