

## Appendix 2.2: Proposed Scope of SEI 2

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

29 April 2021

Dear Theresa,

## Energy Isles Wind Farm-Proposed Supplementary Environmental Information Consultation

ITPenergised has been commissioned by Energy Isles Shetland Ltd (the 'Applicant') to undertake further assessment and consultation works for the proposed Energy Isles Wind Farm (herein referred to as the 'Proposed Development'). Following consultation responses from stakeholders on the Supplementary Environmental Information (SEI), submitted in August 2020, and subsequent feedback on the project, the Applicant is proposing to submit a second SEI (herein referred to as 'SEI 2') which will aim to address stakeholders concerns. The proposed contents of the SEI 2 are detailed within this document.

### Introduction

In December 2020, ITPenergised and the Applicant attended a virtual meeting with Scottish Environment Protection Agency (SEPA), NatureScot (NS), Shetland Island Council (SIC) and the Energy Consents Unit (ECU) to discuss outstanding objections to the Proposed Development. During this meeting, stakeholders maintained their concerns in relation to impacts on landscape and visual receptors, peatland habitats and ornithological modelling. They also requested further information in relation to the Draft Habitat Management Plan (HMP) and aviation mitigation. Following this meeting, further assessment works have been undertaken to address these concerns and as such, the Applicant is proposing further revisions to the design, which are summarised below.

- The removal of turbines T5, T6, T8, T9 and T10 with all remaining turbines set at 180m tip height
- The removal of associated tracks and hardstandings; and,
- The removal of borrow pit H.

The enclosed Figure 1 highlights the turbines that are being omitted from the design that was submitted with the SEI in August 2020.

Further consultation was undertaken with Sarah Fletcher and Jonathan Swale, of NS to discuss the propose revisions to the design. In a letter dated 19th March 2021, Jonathan Swale provided a response to the consultation request which concluded that the *'design amendment (with further minor suggestions for iteration) is commensurate with our original advice'*. Jonathan also states that NS considers there to be merit in assessing this layout through full EIA'. As a result, we intend to submit SEI 2. On behalf of the Applicant, ITPenergised issued an email to the ECU on the 1<sup>st</sup> April 2021 responding to NS and providing clarifications. This email is attached as Appendix 2.

We have yet to receive a response to the email but consider the clarifications can be addressed as part of NS's response on the scope and content of SEI 2.

This letter sets out the content of the SEI 2, so that the opinion of NS and SEPA on the appropriateness of the scope and content can be accounted for within SEI 2. We acknowledge that SIC may also wish to comment on the proposed content of SEI 2.

### Proposed Approach

It is our intention, given an EIA Report (EIAR) was completed in 2019 and SEI submitted in August 2020, that SEI 2 is specifically focused on addressing the points of concern raised by NS and SEPA, and summarised above. This is particularly important given that the revised scheme has a reduced number of turbines and associated infrastructure, and that therefore, the impacts are likely to be less than those predicted within the EIAR and SEI.

SEI 2 will be provided as a report which clearly sets out the background to the design iteration being proposed and demonstrates the resulting change to the impact assessment.

In terms of the content of SEI 2, we have reviewed the points raised by NS (letter dated 9<sup>th</sup> October 2020) and SEPA (letter dated 26 October 2020) in response to the August 2020 SEI. As a result, the focus of SEI 2 will be on revising and updating the following documents and their associated appendices and figures:

1. Chapter 3: Design Iterations
2. Chapter 5: Landscape and Visual;
3. Chapter 6: Ornithology,
4. Chapter 7: Ecology
5. Chapter 10: Geology, Peat, Hydrology and Hydrogeology;
6. Chapter 18: Summary of Residual Effects; and
7. Planning Statement.

A review of the remaining EIA documents will be undertaken, and updated where required, or an explanation provided as to why an update wasn't necessary.

The proposed scope and content for each of the technical topics is outlined in the sections below. We kindly request that NS and SEPA review and provide any comments they may have in relation to the proposed scope of SEI 2.

### Landscape and Visual

An updated Landscape & Visual Impact Assessment will be provided which considers the effects of the revised proposed development on the landscape and visual resource. The Chapter will firstly undertake a screening exercise, to identify which receptors considered in the original LVIA have the potential to be affected under the revised scheme and will filter out receptors that were found to experience 'Not Significant' effects. Effects on Wild Land Areas will be screened out on this basis. The Chapter will undertake a focussed assessment of effects, concentrating on a 20km study area and drawing on the baseline information presented in the original EIAR where possible to avoid repetition.

The Chapter will include an assessment of effects on the following receptors:

1. Landscape Character, with reference to the Shetland Capacity Study;

2. Landscape Designations, including an updated tabular assessment of effects on the special qualities of both the North Roe and Unst sections of the Shetland National Scenic Area (NSA);
3. Visual effects, including an updated tabular assessment of effects at the representative viewpoints;
4. Cumulative effects, focussing on likely significant additional effects on key landscape and visual receptors;
5. Residential Visual Amenity, including a tabular updated assessment highlighting changes to the assessment resulting from the revised scheme;
6. Assessment of effects from visible aviation lighting, including exploration of a range of mitigation options to reduce or minimise night time visual effects; and
7. A tabular Comparative Assessment examining the differences in L&V effects when compared with the submitted scheme, to illustrate positive mitigation achieved.

The LVIA SEI 2 Chapter will be supported with a range of GIS Plans and Visualisations including:

1. Blade Tip ZTV overlaid on landscape character typology;
2. Blade Tip ZTV overlaid on landscape designations;
3. Blade Tip ZTV overlaid on principal visual receptors;
4. Blade Tip ZTV overlaid on residential property receptors;
5. Aviation lighting ZTV (hub height);
6. Aviation lighting intensity ZTV;
7. Comparative ZTV illustrating differences between applied for and revised schemes;
8. Comparative, cumulative wirelines for all representative viewpoints illustrating the difference in visibility between the original and revised schemes;
9. Updated visualisations for representative viewpoints within 25km, including photomontages; and
10. Comparative wirelines for residential properties.

This update assessment will be undertaken by Hermitage Environmental Planning and Landscape Architecture Ltd (HEPLA), with support from Optimised Environments Ltd (OPEN).

### Ornithology

NS, in their letter of 9 October 2020, make clear their specific concerns about the collision risk model (CRM) used to inform the SEI. NS are concerned about a data error within the CRM which requires to be rectified to enable NS to complete their assessment on the potential for adverse effects on the Bluemull and Colgrave Sounds proposed Special Protection Area (pSPA). We propose to re-run the CRM model, addressing the error that has been highlighted but also updating the model based on the revised 18 turbine layout. This will be undertaken by BSG consultants, who completed the original CRM assessment. In addition, the model output will be subject to an independent peer review by a recognised ornithological specialist, which we trust will provide NS with greater confidence in the accuracy of the CRM assessment.

### Ecology

Chapter 7: Ecology will be updated to reflect the removal of turbines and infrastructure to demonstrate the reduction in the impact on habitats. This will include an update to the draft Habitat Management Plan.

The update to Chapter 7: Ecology and the Draft Habitat Management Plan, will be undertaken by ITPEnersised ecologists.

## Peat and Peatland Habitat

In the SEPA response to the August 2020 SEI (letter dated 26 October 2020) they state that ‘SEPA must now object in principle to the siting of the windfarm in this location’. We understand that is due to a change in SEPA policy in regard to their Climate Change Duty. SEPA are specifically concerned about the carbon emissions that could result from the disturbance to peatland and carbon rich soils. For SEI 2, we will update Chapter 10: Geology, Peat, Hydrology and Hydrogeology, as well as the Peat Management Plan (PMP) to take account of the removal of the five turbines and infrastructure as well as the comments provided by SEPA. We will also re-run the carbon calculator to determine the payback period for the revised Proposed Development.

In terms of NS response to the SEI (letter dated 9 October 2021), in regard to peatland, we note the comments about the need to review the proposed location of potential peat restoration areas outwith the Proposed Development site. We have addressed this point in a document entitled *CONFIDENTIAL Habitat Management Plan Option Areas (April 2021)*, which is enclosed as Appendix 1. This document presents potential peatland restoration sites which have been assessed for their suitability. We welcome the views of both SEPA and NS on this document.

NS have also commented in their letter (paragraph 3.7) on their concerns about measures to enhance moorland habitat for waders and red-throated diver. They’re concerned that such measures may be at the expense of blanket bog integrity and stability. We propose to address this in SEI 2, although we don’t consider the two elements to be mutually exclusive and we believe there is an opportunity to achieve positive outcomes for bird species and the blanket bog habitat.

ITPEnergised will update Chapter 10, PMP and the carbon calculator.

## Planning Statement

We consider it is important to provide an update to the Planning Statement as part of SEI 2. This is particularly relevant given the implications of Scotland’s Fourth National Planning Framework (NPF 4) which is currently being developed by the Scottish Government. A recent position statement confirms that NPF 4 will place greater emphasis on a planning system that helps to address the climate crisis.

## Conclusion

As outlined above, we can confirm that we are progressing with the completion of the second Supplementary Environmental Information in support of a Proposed Development that has been further reduced from 23 turbines to 18 turbines. SEI 2 will seek to address the concerns raised by NS and SEPA to date, as well as any other relevant points raised through consultation (i.e. on SEI 2 content). We trust this is helpful and would be grateful for a response to this letter, as soon as possible, but certainly before the 25<sup>th</sup> May 2021, to enable sufficient time to take account of comments provided. Our aim is to submit the SEI by June 2021 and therefore a prompt response would be much appreciated. Should a response not be forthcoming, from either NS or SEPA, within the timeframe, we will proceed with completion and submission of SEI 2.

Should the ECU, NS or SEPA have any queries on this we would be happy to discuss further.

Yours sincerely



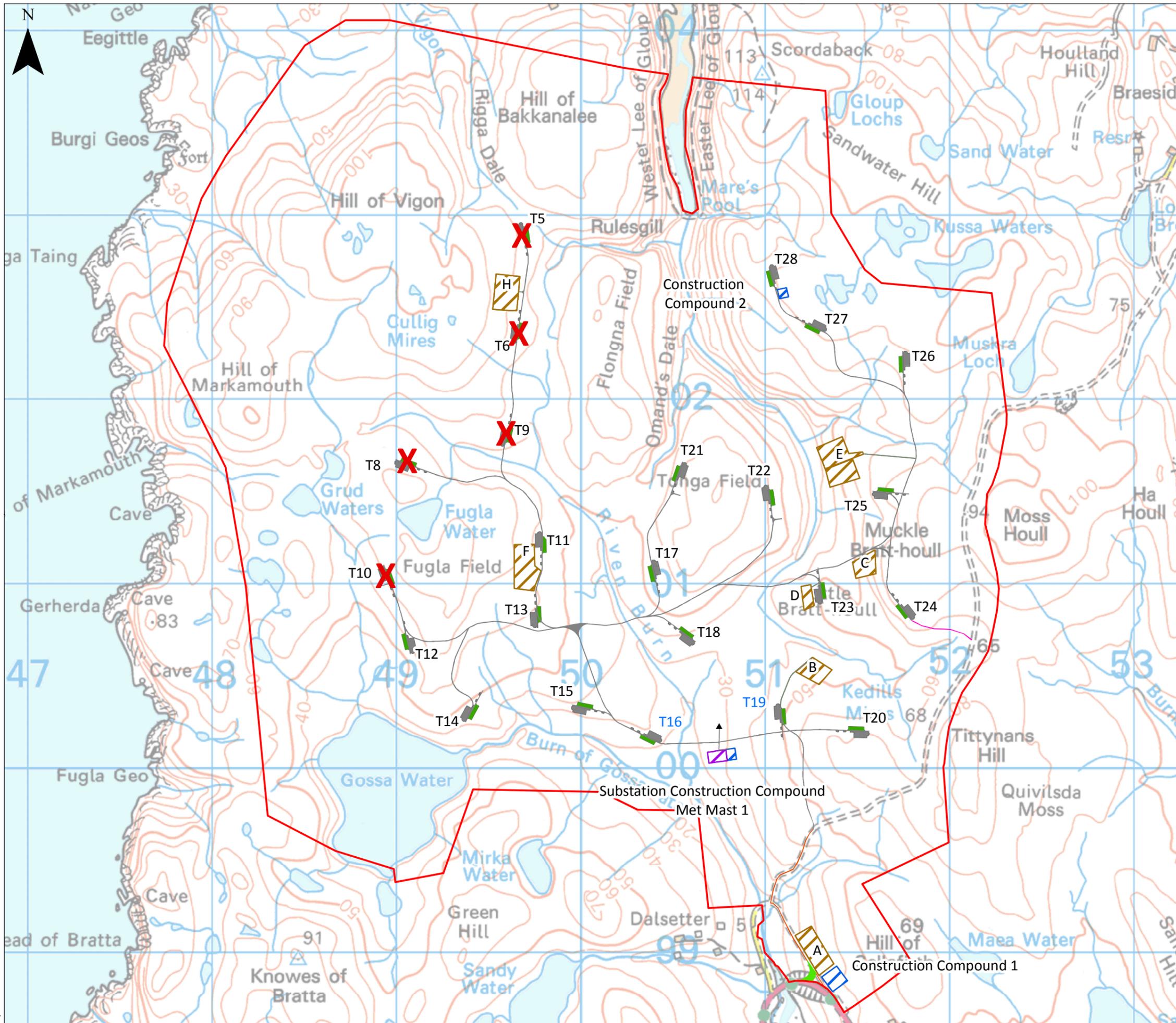
Paul Darnbrough  
Technical Director  
ITPEnergised

Enclosures:

Figure 1: SEI Layout (showing turbines to be removed)

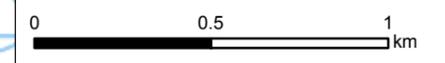
Appendix 1: CONFIDENTIAL Habitat Management Plan Option Areas

Appendix 2: Email to ECU in response to NatureScot (1 April 2021)



**KEY**

- Site Boundary
- T1 180m Turbine Identifier
- X Turbine Removed from SEI Layout
- Turbine Hardstanding and New Access Track
- Temporary Laydown Area
- New Access Track for Emergency Use Only
- New Access Track for Abnormal Loads Only
- Upgrades to Existing Road
- Substation
- Potential Borrow Pit Search Area
- A Borrow Pit Search Area Identifier
- Temporary Construction Compounds
- ▲ Met Mast (note symbol does not indicate met mast size just its location)



Scale 1:20,000 @ A3



Energy Isles Wind Farm

**Figure 1**  
SEI layout  
(showing turbines to be removed for SEI 2)

Date: 27/04/2021	Drawn by: ST	Checked by: RT	Version: V1
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Project Number: 280

## Appendix 1

The confidential appendix has been redacted from Appendix 2.2 of SEI 2.

Confidential

## Appendix 2

Energy Isles- response to NatureScot - Message (HTML)

File Message Help Tell me what you want to do

Delete Archive Move Reply Reply All Forward Mark Unread Categorize Follow Up Translate Find Smart Lookup Read Aloud Zoom

Energy Isles- response to NatureScot

Paul Darnbrough  
To: Theresa.McInnes@gov.scot  
Cc: Healey Charlotte; Lafferty Heather; Sarah Tullie; David Bell

Reply Reply All Forward

Thu 01/04/2021 21:55

Hi Theresa,

Thanks for passing on the letter from Jonathan at NatureScot (dated 19<sup>th</sup> March 2021). We have reviewed the letter and are generally pleased with the comments.

We would like to clarify that a tip height of 180 m is proposed for all 18 turbines as opposed to a mix of 180 m and 200 m as stated in the letter. We also seek clarification, from NatureScot on the reference to 'design amendment (with further minor suggestions for iteration)' mentioned in paragraph six of the Appraisal section. If further explanation could be provided that would be very helpful.

We note NatureScot's requirement for a site visit and to aid this process we could arrange for our landscape architect (James Welch of OPEN) to join the NatureScot team, it this was helpful and subject to Covid restrictions.

In reference to the EIA process, we trust that NatureScot are referring to the need to produce Supplementary Environmental Information (SEI) under the terms of the EIA Regulations, as was done previously. As such, we propose setting out the scope of the proposed SEI for consultation and agreement with NatureScot, SEPA and the ECU. Once we have this scope agreed we will be in a position to provide a timetable, but because of the delay in being able to start the SEI, we are likely to be looking at a September committee meeting with Shetland Council.

Could you please pass the response above to Jonathan and Sarah and thank them both for their inputs.

I hope you have a nice Easter weekend.

Best regards,

Paul

Paul Darnbrough | Technical Director | IPEnergised

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