

# Appendix 4.3 - Cross-reference of EIA Scoping Opinion in the EIA Report

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Executive Summary

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## Executive Summary

Following receipt of the EIA Scoping Opinion the Applicant has considered the consultation received and Table 1 below provides a cross-reference to the appropriate chapter within the EIA Report where a response is provided.

**Table 1 – Summary of EIA Scoping Opinion**

Technical Discipline	Consultee	Scoping Opinion	EIA Report
Landscape and Visual	Orkney Islands Council	<p><i>“The ZTV requires to provide additional information to inform the LVIA and CLVIA from that indicated. ZTVs should be provided for both:</i></p> <ul style="list-style-type: none"> <li><i>• Blade tip ZTV; and</i></li> <li><i>• Hub height (or nacelle) ZTV.</i></li> </ul> <p><i>The following information should also be included:</i></p> <ul style="list-style-type: none"> <li><i>• how many of the wind turbines are likely to be visible;</i></li> <li><i>• how much of the wind turbines is theoretically visible (if separate ZTVs are produced showing theoretical visibility to blade tip height, and also theoretical visibility of the hub or nacelle); and</i></li> <li><i>• the theoretical visibility of different numbers of wind turbines (within a single development, or between different wind farms within a cumulative ZTV)</i></li> </ul> <p><i>The above information will aid selecting the visual receptors to be used in the assessment, these should be selected beforehand to reflect these receptors and with agreement from the HES, the Council and SNH. The preliminary viewpoints suggested are inadequate and further consultation on these requires to be undertaken”.</i></p>	Refer to Chapter 6 of the EIA Report.
		<p><i>“Notwithstanding the fact that the scale of the development exceeds current maximum parameters, mindful of the draft Development Management Guidance ‘Energy’ noted in 5.2.2. and Landscape Assessment which specifies that Faray should be retained free of turbines, were the project to be progressed further, the Council agrees with the findings of the Scoping Request Statement that a full Landscape and Visual Impact Assessment (LVIA) and Cumulative Landscape and Visual Impact Assessment (CLVIA) shall be required”.</i></p>	
		<p><i>“The LVIA must accord with best practice and current guidance at time of application, with the Guidance for Landscape and Visual Impact Assessment (3rd</i></p>	

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		<p><i>edition) being the current standard and as supported by SNH. Final representative viewpoints (VP's) shall be subject to agreement in advance of preparation of the LVIA. The main sensitive visual and landscape receptors, informed by forecast ZTV, desk-based research, site survey and 3D modelling, shall include, but not be limited to, residential properties and settlements, views from recognised viewpoints, main routes (land &amp; sea), visitor attractions and sites of historic interest. The requirement to consider receptors including sea borne routes owing to regular ferry traffic and cruise ships. Consideration of the likely visual effects of the proposed development on tourism and recreation features and facilities, noting in particular core paths and the cruise ships should also be used to identify suitable VPs".</i></p> <p><i>"It is agreed that a Residential Visual Amenity Assessment should be included as a separate report as indicated within the submitted Scoping Report and that such will focus, although not necessarily be confined to, properties within 2 km of the proposed development given the very large scale of the of wind turbines as indicated".</i></p>	
	NatureScot (formerly SNH)	<i>"Turbines with a tip height of 150m or taller would require visible lighting for aviation safety, and some turbines of less than 150m may also require lights depending on the proximity to civil and military aviation interests".</i>	
Ornithology	Orkney Islands Council (Case Officer: Environment)	Several SSSIs and Special Protection Areas (SPA) for birds are located within foraging range of Faray. An assessment should be undertaken of the likely direct and indirect effects of the proposal on the qualifying interests of these sites. Mill Loch SSSI on the neighbouring island of Eday is designated for breeding Red-throated diver and this species may be particularly at risk of collision with rotating turbine blades, as they travel between their nesting sites and feeding areas in the marine environment.	Refer to Chapter 7 of the EIA Report.

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		<p>The assessment should address the effects of all stages of the proposal on the bird species of these sites, including collision risk. Vantage Point surveys should be undertaken in line with current guidance which may be accessed from the NatureScot website at <a href="http://www.nature.scot">www.nature.scot</a>, and advice should be sought from NatureScot on the scope and frequency of these surveys, as well as potential vantage point locations.</p> <p>It should also consider the cumulative impact of the proposal with other wind turbine developments, including any wind energy proposals which are currently in the planning system. Information on the qualifying features of the relevant internationally and nationally designated sites is available from 'SiteLink' which may be accessed from the Scottish Natural Heritage website at <a href="https://sitelink.nature.scot/home">https://sitelink.nature.scot/home</a></p>	
		<p>OIC welcome the commitment to undertake a breeding bird survey which will include a survey of breeding storm petrel, with follow up studies of nocturnal flight activity where necessary.</p>	
	RSPB	<p>Having examined the scoping report, RSPB wish to reiterate comments made by NatureScot (formerly SNH) regarding the welcome inclusion of a survey of breeding storm petrels, with follow-up nocturnal flight activity where necessary.</p>	
		<p>On the survey effort point, RSPB do not support the proposal to undertake only one years' worth of data collection. A lack of two years' worth of data will serve to increase any uncertainties in the assessment and devalue the robustness of its conclusions. As stated in the Scoping Report, there are a number of designated sites, including SPAs and pSPAs, within 20 km of Faray. Due consideration should be given to potential connectivity to these sites, particularly with regard to the collision risk impacts on their qualifying features and any in-combination impacts from other relevant developments.</p>	

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	NatureScot (Formerly SNH)	<p>Supporting seabird survey data is available from JNCC's National Seabird Census. Faray and Holm of Faray were last surveyed in 2018 (see count results at <a href="http://jncc.defra.gov.uk/smp/sitesBrowser.aspx?siteID=93797">http://jncc.defra.gov.uk/smp/sitesBrowser.aspx?siteID=93797</a>). Further details regarding the distribution/breeding locations in 2018 may be available from the national census coordinator.</p> <p>NatureScot welcome the proposed checks for breeding storm petrels, given the lack of survey data since they were last recorded breeding on Faray and Holm of Faray in 2000. The standard methods for assessing collision risk do not apply to storm petrels because of their nocturnal behaviour, but NatureScot would be happy to discuss the need for any further assessment that might be required should storm petrel breeding colonies or other significant activity be recorded.</p>	
Ecology	Orkney Islands Council	<p>Noted a requirement for:</p> <ul style="list-style-type: none"> <li>▪ A description of the baseline;</li> <li>▪ Identification of relevant receptors;</li> <li>▪ A description of likely effects resulting from the development, including cumulative effects; and,</li> <li>▪ Mitigation measures.</li> </ul> <p>Recognised Scottish Natural Heritage's (SNH) (now NatureScot) requirements regarding seals (see below).</p> <p>Recognised Scottish Environment Protection Agency's (SEPA) requirements regarding groundwater-dependent terrestrial ecosystems and pollution prevention.</p> <p>Noted the Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) designations for the island and wider area; and the need to avoid works</p>	Refer to Chapter 8 of the EIA Report.

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		during the seal breeding season. Also noted the potential presence of the European Protected Species (EPS) Eurasian otter on the island and the presence of cetacean species in the waters off the island.	
	SEPA	Advised to identify and map any groundwater-dependent ecosystem (GWDTE) areas.	Refer to chapters 8 and 11 of the EIA Report.
	NatureScot (Formerly SNH)	Advised that the most significant natural heritage interests likely to be affected by the proposal are the grey seals ( <i>Halichoenus grypus</i> ) of the Faray & Holm of Faray SAC and harbour seals ( <i>Phoca vitulina</i> ) of the Sanday SAC.	Refer to Chapter 8 of the EIA Report.
		Requirement for a HRA to be undertaken for both SACs, though effects are not anticipated. Faray is within the 40-50 km harbour seal foraging distance of the Sanday harbour seal population.  Noted: <i>“The commitment to undertake construction work outwith the grey seal breeding season is particularly important in avoiding any adverse effect on Faray &amp; Holm of Faray SAC.”</i>	
		Seal count survey required (outline of methodology also provided).	
Noise	Orkney Islands Council	Proposed location on an uninhabited island means noise and vibration impacts are unlikely to cause significant concern to human receptors. Environmental Health required the use of ETSU-R-97 (including Institute of Acoustics GPG/SGN) based methodology and general approach. OIC Environmental Health note that the propagation of noise between turbines and noise sensitive receptors will predominately be over water, as such the developer should have due regard to ‘loA SGN 6: Noise propagation over water for on-shore Wind Turbines’.	Refer to Chapter 9 of the EIA Report.



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Cultural Heritage	HES	<p>HES stated that they considered a potential for significant adverse impacts on heritage assets within their remit including the Quoy Broch 270m NW of (Scheduled Monument, Index no.1440).</p> <p>Assessment should consider the potential for impacts on the setting of heritage assets located on nearby islands and should include the following heritage assets located on Eday and Rapness [sic]:</p> <ul style="list-style-type: none"> <li>• Muckle Hill of Linkataing, chambered cairn, homestead and field system (Scheduled Monument, Index no. 1355)</li> <li>Carrick House, chambered cairn NW of, Eday (Scheduled Monument, Index no. 1432)</li> <li>• Vinquoy Hill, chambered cairn, Eday (Scheduled Monument, Index no.1410)</li> <li>• Huntersquoy, chambered cairn 480m SW of Carrick Farm, Eday (Scheduled Monument, Index no. 1250)</li> <li>• Carrick Farm, chambered cairn and cairn 500m SSW of (Scheduled Monument, Index no.1251)</li> <li>• Fold of Setter, enclosure, Eday (Scheduled Monument, Index no. 1441)</li> <li>• Stone of Setter, Eday (Scheduled Monument, Index No. 4299)</li> <li>• Mill Hill chambered cairn, Millbounds (Scheduled Monument, Index no.1321)</li> <li>• Sangar Crofthouse including adjoining threshing barn, windmill tower, kiln and byre, and detached house to southeast, Rapness, Westray (Category A listed Building, LB48010)</li> </ul> <p>HES also requested sight of any ZTV (Zone of Theoretical Visibility) analysis, provisional wireframe views and photomontages prior to submission of any planning application and EIA Report for the proposals. It noted that provision of a large scale ZTV with heritage assets clearly marked on it would be particularly useful.</p>	Refer to Chapter 10 of the EIA Report.

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	Orkney Islands Council	<p>OIC note that the entire island is of historical importance as a landscape, bearing 6,000 years of habitation, culminating in abandonment in the mid 20th century. Due to its recent use primarily as a sheep run, the preservation of standing building, and archaeological remains in the landscape is good. The island has not been subject to any extensive archaeological survey, so few items are currently recorded. In support of the EIA, an assessment should be undertaken of the historic environment/archaeology of both Faray and the Holm of Faray up to and including the 20th century remains, including the intertidal zone. The assessment should include a walkover survey and desk-based assessment and this should inform the design layout of the proposal to avoid any direct impact on physical remains of significance. Furthermore, the EIA should include a viewshed analysis to identify historic environment assets that may be effected by the proposal and an assessment that considers impacts on the setting of the identified sites.</p>	
Geology, Hydrology and Hydrogeology	Orkney Islands Council	<p>OIC notes that Soil Survey of Scotland mapping indicates that Faray is underlain by peaty gleys, and the application should therefore be accompanied by a peatland management plan.</p>	Refer to Chapter 11 of the EIA Report.
		<p>If on-site borrow pits are proposed, then an assessment of associated impacts should be included.</p>	
	SEPA	<p>SEPA advises that the following key issues need to be addressed in the EIA process:</p> <ul style="list-style-type: none"> <li>a) Map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any related CAR applications.</li> <li>b) Map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems and buffers.</li> <li>c) Map and assessment of impacts upon groundwater abstractions and buffers.</li> </ul>	

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		<p>d) Assessment of any peat and if applicable table detailing re-use proposals.</p> <p>e) Map and site layout of borrow pits</p> <p>f) Schedule of mitigation including pollution prevention measures</p> <p>g) Borrow Pit Site Management Plan of pollution prevention measures/</p> <p>h) Map of proposed waste water drainage layout</p> <p>i) Map of proposed surface water drainage layout</p> <p>j) Map of proposed water abstractions including details of the proposed operating regime</p> <p>k) Decommissioning statement</p> <p><u>Site Specific Requirements</u></p> <p>It should be confirmed that the wells on the island are no longer used to provide drinking water.</p> <p>Provided watercourse crossings are designed to accommodate the 1 in 200 year event and other infrastructure is located well away from watercourses, SEPA does not foresee a need for detailed information on flood risk.</p> <p>Any infrastructure required on the coast may need to take into account the estimated 1 in 200 year coastal flood level for the area of 3.5 m Above Ordnance Datum.</p>	
Traffic and Transport	Orkney Islands Council	<p>There are no adopted public roads anywhere near the proposed site.</p> <p>Full details of all loads that would be transported from Orkney Mainland to the site must be considered with their potential impact.</p> <p>Need to outline the scale of the infrastructure required to access the site.</p>	Refer to Chapter 12 of the EIA Report.

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		A Section 96 Agreement to cover abnormal wear and tear on the road network may be required.	
Socio-economic, recreation and tourism	Orkney Islands Council	<p>Orkney Islands Council Development and Infrastructure scoping opinion set out what socio-economic impacts should be considered with reference to the Supplementary Guidance Energy, part of the Local Development Plan 2017.</p> <p>This refers to the consideration of local net-economic impacts, as well as of local business and supply chain opportunities.</p> <p>Other factors that the analysis of net economic benefits can consider include local and community ownership.</p> <p>The assessment should consider whether there is the potential for any adverse effects on tourism and recreation to residents and visitors.</p>	Refer to Chapter 13 of the EIA Report.
Aviation	MoD	No Objection. May have concerns in relation to low flying. Request for Infra-Red (IR) or low intensity visible lighting.	Refer to Chapter 14 of the EIA Report.
	Kirkwall Airport (Loganair Chief Pilot)	No objection. Request for red aviation safety lighting.	
Shadow Flicker	Orkney Islands Council	<p>With reference to shadow flicker it is noted that the 10 times rotor blade diameter separation distance is cited.</p> <p>Notwithstanding development criterion within Supplementary Guidance quoting this separation distance, as a general point the onus should be on avoiding harm and nuisance, which should be established by exposure thresholds, and not necessarily on limiting the area of assessment. The mitigation hierarchy of prevent, reduce and offset should be followed and detailed within the EIA Report given inhabited properties within 2km of the site.</p>	Refer to Chapter 15 of the EIA Report.
Telecommunications	JRC	JRC raised no concerns with relation to the Scoping Layout.	Refer to Chapter 17 of the EIA Report.

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Air Quality	Orkney Islands Council	Full assessment of the impacts on air quality should be provided within the EIA report which may arise from activities related to the development, in particular stone excavation.	Refer to Chapter 17 of the EIA Report.

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