

## **APPENDIX A1.1**

### **LIST OF COMMENTS FROM STATUTORY CONSULTEES**

# LIST OF COMMENTS FROM STATUTORY CONSULTEES

Highlighted section on page 22 Requires confirmation and highlight removed

Objections from statutory consultees have been addressed explicitly and our response is described in the relevant chapters. A full summary of statutory objections is provided in Table 1 below. Reference is provided to those sections of the ES Addendum where statutory objections have been addressed.

Other recommendations and comments from statutory consultees have also been reviewed in full. Where possible these considerations have been addressed directly. A full summary of all statutory consultee recommendations and comments is provided in Table 1. Where a recommendation or comment has not been addressed explicitly a general reference to the most relevant section of the ES Addendum is provided.

**Table 1: Summary of statutory objections, recommendations and comments received in response to the 2009 Viking Wind Farm ES**

Response Status	Summary	Addendum Reference
<b>Historic Scotland</b>		
Objection	Predicted significant impact on setting of 8 scheduled monuments (Burravoe chambered cairn (cc); Graven cc; Knowe of Bruland c; Hayfield cc; Crooksetter Hill cc SE; Crooksetter Hill cc NW; Skeo of Gossaford c; and Hill of Dale cc) assessed as unacceptable in terms of national policy for the protection of the historic environment. Hill of Dale cc also close to search area for borrow pits and tracks.	Chapter A13, Sections A13.5; A13.7; and A13.8
Comment	Significant impact of wind farm on number of monuments could be mitigated to acceptable level through deletion/ movement of specified turbines.	Chapter A13, Sections A13.7; A13.8
Recommendation	Removal of turbines D1, D2, D3, D9, D10, D11, D12, D13, D14, D15, D16 & D25 to mitigate impacts on Graven, Hill of Dale and Crooksetter Hill chambered cairns, and Skeo of Gossaford Cairn.	Chapter A13, Sections A13.7; A13.8
Recommendation	Removal of turbines D27, D29, D30, D31, D32 & D33 to mitigate impacts on Burravoe and Crooksetter Hill chambered cairns, and Skeo of Gossaford cairn.	Chapter A13, Sections A13.7; A13.8
Recommendation	Relocation of turbines K47, K48, K49, K55, K56, K67, K68, K70, K71 & K72 to mitigate impacts on Hayfield chambered cairn.	Chapter A13, Sections A13.7; A13.8
Recommendation	Relocate turbines N92, N93, N94, N95, N96, N97 and N99 to mitigate impacts on Knowe of Bruland cairn.	Chapter A13, Sections A13.7; A13.8
Recommendation	Confine borrow pit located in immediate proximity to NW slope of hill (Hill of Dale chambered cairn).	Revised Cultural Heritage Assessment provided in Chapter A13
Recommendation	Suggest revise impact significance for Stany Cuml cairn 450m NW of westernmost part of Loch Stavaness (index no 3587) from major to moderate. No objection.	Appendix A13.4

Response Status	Summary	Addendum Reference
Recommendation	Suggest revise impact significance from major to moderate for Loch of Freester, chambered cairn 110m NW of westernmost point of (index no 3595). No objection.	Appendix A13.4
Recommendation	Suggest revise impact significance from major to moderate for Hard Knowe, cairn WNW of westernmost point of (index no 3598) . No objection.	Appendix A13.4
Recommendation	Suggest revise impact significance from major to moderate for Bekka Hill, chambered cairn 770m N of (index no 5717). No objection.	Appendix A13.4
Recommendation	Suggest revise impact significance from major to moderate for Gravlaba, settlement and standing stones (index no 5731). No objection.	Appendix A13.4
Recommendation	Impact on Staneydale Temple (index no 90283) setting moderate not minor. No objection.	Revised Cultural Heritage Assessment provided in Chapter A13
Recommendation	Impact on Lunna House & designed LS setting moderate not minor. No objection.	Revised Cultural Heritage Assessment provided in Chapter A13
Comment	Temporary development should not be regarded as less damaging to the setting of monuments. As stands assessment not in accordance with principles of temporary permissions in paragraph 105 of Circular 4/1998	Chapter A13.4
Comment	Given the scale and number of turbines proposed, concept of 'visual attenuation' not a meaningful mitigation option.	Chapter A13.4
Comment	The criteria 'significance of the original setting' not relevant since starting point for assessment of setting should be the current setting.	Chapter A13.4
Comment	The criteria of monument amenity value not relevant since primary purpose of scheduling is not to give any additional rights of public access.	Chapter A13.4
Comment	Whilst national and regional policy used to guide relative site sensitivity criteria, setting has been interpreted rather narrowly, as a visual issue.	Chapter A13.4
Comment	Concern some information provided in visual impact assessments could be slightly misleading, particularly 10.3 'relationship and intervisibility with other key sites' as ES states in second paragraph of 13.4.5 this not assessed.	Chapter A13.4
Comment	Disagrees with minor significance finding in summary of residual effects.	Chapter A13, Sections A13.4; A13.7; A13.8; A13.9
Comment	No mitigation offered to reduce 'significant' impacts on setting of identified scheduled monuments. Given scale of development/ turbine size it is accepted difficult/impossible to mitigate impacts of wind turbines in this open landscape.	Chapter A13.8
Comment	Mitigation strategy and assessment of residual impacts focus on avoidance of direct impacts. As no mitigation proposed for settings of identified sites, impacts remain significant.	Chapter A13, Sections A13.8; A13.9
<b>SEPA</b>		
Comment	Even if best practice followed and mitigation employed, scale of this development in peatland location likely to have residual negative impact on environment.	Revised soils and water impact assessment presented in Chapter A14
Condition	50m-100m micrositing buffer detailed in ES to be ensured through condition.	Appendix A14.6 Technical Schedules 7 & 8
Comment	Careful micrositing particularly required at turbines K64, K65, K66 and K72 due to presence of deep peat.	Micrositing considered in Appendix A14.6 Technical Schedules 7 and 8

Response Status	Summary	Addendum Reference
Comment	Even with impact minimisation, impacts on water environment including wetlands likely.	Revised soils and water impact assessment presented in Chapter A14. SEMP provided in Appendix A14.6
Condition	Implementation and control of micrositing to be part of Environmental Management Plan (EMP). EMP to state no permission of re-siting outwith micrositing boundaries.	Micrositing considered in Appendix A14.6 Technical Schedules 7 and 8
Condition	Construction Method Statements and EMP required and are to include technique details for pollution prevention and treatment of contaminated water.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6. Technical Schedules 2 & 9 most relevant
Condition	Minimum Buffer to water courses set at 50m (except access track leading to crossing).	Considered within the SEMP at Appendix A14.6 Technical Schedules 2 & 5
Condition	Agree site specific buffer distances with SEPA. Buffer distances in excess of 50m likely under certain soil conditions.	Method for agreeing buffer distances presented in SEMP at Appendix A14.6
Condition	Demarcation of identified hydrologically sensitive areas required.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6.
Condition	Concrete batching at compounds only and at least 50m from water course or standing water.	Concrete Batching considered in SEMP at Appendix A14.6 Technical Schedule 2
Condition	Employment of a range of suitability qualified specialists, with authority to take action, to be present on site at all times.	Appendix A14.6A Technical Schedule 8
Condition	Environmental auditing and monitoring required during construction. To include environmental check list, weather forecasting and actions in place for adverse forecasts.	Considered within the SEMP at Appendix A14.6
Condition	Establish mechanism to dictate timing of works to avoid adverse conditions with increased pollution risk.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Recommendation	Scottish water should be consulted to check that additional drain loadings are acceptable.	Drainage management issues considered in SEMP at Appendix A14.6 Technical Schedule 6
Comment	Compound locations may be unsuitable for soakaways and so alternatives need to be examined.	Drainage management issues considered in SEMP at Appendix A14.6 Technical Schedule 6
Comment	Happy to be involved once planning permission received.	proposed SEPA involvement described in SEMP at Appendix A14.6
Comment	Residual impact of pollution from construction phase 'moderate' rather than 'minor'. Pollution remains likely outcome from such a large scale construction project in a wet environment.	Revised soils and water assessment presented in Chapter A14

Response Status	Summary	Addendum Reference
Comment	Adopt additional approach of minimising disruption to peatland, thereby reducing volume and problems of excavated peat.	Peat excavation methods discussed in SEMP at Appendix A14.6 Technical Schedule 7
Comment	97 water crossings still proposed although ES states they are avoided where possible.	Revisions to water crossings considered in Chapter A14.5. Water Course Crossing Plan presented at Appendix A16.4 Technical Schedule 5
Recommendation	Delete access to Scord of Sound and turbines K77 and K76.	Not implemented. Turbine deletions are presented in Chapter A4.2.
Recommendation	Delete access from turbine D2 to D4.	Track deletions are presented in Chapter A4.2.
Recommendation	Revise access to 'D' turbines; D16 and D17 only 1Km from road.	Not implemented. Track revisions are presented in Chapter A4.2
Recommendation	Use more of existing track on Hill of Susetter to access 'C' turbines.	Track revisions are presented in Chapter A4.2
Recommendation	Delete access at Setter House. Utilise Upper Kergord access instead.	Not implemented. Track deletions are presented in Chapter A4.2
Comment	Proposal expected to fall under Category 1 of CAR Regulations, 'capable' of being authorised.	SEMP at Appendix A14.6 designed to meet CAR Regulation standards
Comment	No reference to new water quality classification required as part of the Water Framework Directive River Basin Management Plan.	Chapter A14.5
Comment	Public highway upgrade works, where involve upgrade/replacement affecting water bodies, require clarification.	Chapter A15.7
Condition	Water environment disturbance compensation measures and recommendations in fish survey chapter ensured by condition and with agreement of consultees.	N/A
Objection	Siltation from development a major problem for aquatic life. Particular concern regarding sediment impacts on lochs. SEPA object due to lack of information on potential impact of sedimentation.	A14.2; Appendix A14.6 Technical Schedules 1, 2, 3, 4, 5, 6, 7, 8 & 9.
Condition	Benthic diatom survey required at Truggle Water, Maa Water, Lamba Water, Petta Water, Loch of Skellister, Gossa Water, Laxobiggin and south burn of Burrafirth.	Remit of EcOW detailed in SEMP at Appendix A14.6 Technical Schedule 8
Condition	Request additional pre-construction survey to assess "natural" annual variation in fish abundance.	Remit of EcOW detailed in SEMP at Appendix A14.6 Technical Schedule 8
Comment	Freshwater invertebrate assessment data could be improved by adding more sites from upper watercourses.	Revised ecological impact assessment presented in Chapter A10
Comment	Statement that base-rich flushes have no legal conservation status is false. They are protected under the Habitats Directive and Water Environment and Water Services (Scotland) Act 2003 (WEWS).	Revised ecological impact assessment presented in Chapter A10
Condition	Submission and approval (in consultation with appropriate bodies) of full site specific Ecological Monitoring Programme. SEPA require inclusion of monitoring for impacts of restoration on water quality and peatland hydrology.	Appendix A14.6, in particular Technical Schedules 2, 6 & 8
Condition	Habitat Management Plan (HMP) to be required by condition.	Appendix A10.9

Response Status	Summary	Addendum Reference
Comment	Concern regarding practicalities of HMP proposals and potential wider impacts.	Revised HMP presented at Appendix A10.9
Comment	Number of HMP proposals unproven and successful implementation is questionable. Plan needs to acknowledge irreplaceable nature of blanket bog.	Revised HMP presented at Appendix A10.9
Comment	Some proposals may increase degradation, including impact of moving peat for restoration, and effects on down-stream hydrology of blocking peat gullies.	Revised HMP presented at Appendix A10.9
Condition	No lochan works or any works to standing water within HMP without written approval of SEPA and SNH.	Revised HMP presented at Appendix A10.9. Implementation method proposed in SEMP at Appendix A14.6
Recommendation	Further thought required regarding habitat management to enable agreement on practical and realistic management.	Revised HMP presented at Appendix A10.9
Recommendation	Should seek advice from SNH on best practice for restoration works and include research details in HMP.	Revised HMP presented at Appendix A10.9
Comment	Abstractions for concrete batching/dust suppression etc will require CAR authorisation. Detail on abstraction rates and yields required.	Concrete batching and dust suppression considered in SEMP at Appendix A14.6
Comment	Dewatering to lower groundwater table may require CAR license. May cause local drying of peat with ecological consequences.	Ecological management arrangements considered in SEMP at Appendix A14.6
Condition	Further consideration to be given to risk assessment and appropriate mitigation for impact on private water supply if significant at a later stage.	Chapter A14.8
Comment	Maximum peat depth in which cut track construction currently planned is unclear.	Chapter A4.2
Comment	Unlikely some track areas could support type of construction proposed. Floating tracks will sink over relatively short time scales if heavily trafficked. Concern need for further rock to be used and that tracks become 'causeways'.	Floating track construction considered in Chapter A14.7 and Appendix A14.6 Technical Schedule 6
Condition	No objection to access track design so long as similar site specific method statement to Clyde Wind Farm access tracks is used.	Track construction issues are considered in the SEMP at Appendix A14.6
Recommendation	Particular attention to be paid to risk of peat slides; likely under-reporting of occurrence due to remote location.	SEMP provided at Appendix A14.6
Comment	Photographic evidence that shallow slopes may result in peat slides.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)

Response Status	Summary	Addendum Reference
Comment	Lack of Ground Investigation over many at risk areas casts doubt on conclusion that there is insignificant risk of peat-slide.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Comment	Cabling impact dependent on backfill material. Current inconsistency in method to be clarified in Construction Method statement.	Management of ecological construction issues considered in SEMP at Appendix A14.6
Condition	All cables to be contained in disturbed areas adjacent to tracks unless pre agreed.	Management of ecological construction issues considered in SEMP at Appendix A14.7
Comment	Grid connection to convertor station is a material consideration. SG should request assessment of effect of connection.	Chapter A1
Comment	Unclear how estimated required volume of stone and 10% contingency calculated.	Borrow pit excavation volumes considered in Chapter A4.3
Comment	Questions total and on-site void volume requirements.	Borrow pit excavation volumes considered in Chapter A4.3
Comment	No detail regarding ability of 14 identified sites to provide required volumes of material.	Borrow pit excavation volumes considered in Chapter A4.3
Condition	Employ phased approach to workings to ensure borrow pits only opened when need, based on detailed site investigation & material balance calculations, is clearly demonstrated to relevant authority.	Ecological management of site workings discussed in SEMP at Appendix A14.6
Condition	Include full details of all borrow pit site investigations and detailed design and working methods. Recommended that site investigations determine level of groundwater table in relation to proposed quarry floor levels.	Ecological management of site workings discussed in SEMP at Appendix A14.6 and in particular Technical Schedule 7
Comment	Possibility of hydraulic linkage between borrow pits NB903 and NBP04 and the Sandwater SSSI.	Chapter A14.2
Comment	Waste management, especially peat and overburden, significant issue for development.	Peat extraction volumes and reinstatement considered in Appendix A14.4. Waste management issues are discussed in SEMP at Appendix A14.6 Technical Schedule 3
Comment	Linkage between waste generated and practices implemented on site. Best practice must be ensured.	Appendix A14.6 Technical Schedule 3
Objection	Objection until worst case scenario for peat volume extraction is calculated.	Chapter A14.2 and Appendix A14.4
Objection	Objection until firmer conclusions reached regarding storage, re-use and disposal options.	Chapter A14.2; Appendix A14.4; and Appendix A14.6
Comment	Inconsistency in ES regarding purpose of peat alongside tracks. If not for landscaping, will be considered waste management activity.	Appendix A14.4

Response Status	Summary	Addendum Reference
Comment	Unclear why 1m shoulder required contrary to 0.5m detailed for Clyde statement. Larger shoulders significantly increase footprint and impacts on drainage and habitats.	Peat extraction volumes and reinstatement considered in Appendix A14.4. Waste management issues are discussed in SEMP at Appendix A14.6 Technical Schedule 3
Comment	All waste disposal requires exemption or licence.	Discussed in SEMP at Appendix A14.6 Technical Schedule 3
Comment	Peat extraction and re-use Table 3 to be revised following further assessment. Proposed re-uses not yet agreed.	Peat extraction volumes and reinstatement considered in Appendix A14.4
Comment	Damage and pollution possible from peat storage given large volumes. Prevention measures not clear in ES and clarification required including plan and methods of storage.	Pollution prevention from excavated material considered in SEMP at Appendix A14.6, in particular Technical Schedule 7
Comment	Borrow pit backfill arrangement means disposal of waste therein will require PPC license for landfill operation.	Reinstatement of borrow pits considered in SEMP at Appendix A14.6 Technical Schedule 7
Comment	Viability of de-watering option requires further investigation and it is unclear whether there is space on Islands to accommodate landfilling off-site.	Peat extraction volumes and reinstatement considered in Appendix A14.4. Implementation issues discussed in Appendix A14.6
Comment	Management options for 10% wasted excavated rock not clear. Outline requested prior to determination.	Management of excavation is discussed in SEMP at Appendix 14.6 Technical Schedule 7
Condition	A site specific Waste Management Plan (WMP), agreed prior to tendering, a condition of permission	Appendix A14.6 Technical Schedule 3
Condition	SEPA want full site specific reinstatement plan, approved by relevant bodies, in place 3 months prior to construction.	Management of reinstatement is considered in Appendix A14.6 Technical Schedules 7 & 8
Comment	Reinstatement strategy to include site plan covering all areas subject to reinstatement and objectives. Further operational disturbance to be detailed and indicated on site plan. Detail methods and timings, consider a phased approach and seek guidance from SNH.	Management of reinstatement is considered in Appendix A14.6 Technical Schedules 7 & 8
Comment	Reinstatement Strategy to be informed by WMP.	Management of reinstatement is considered in Appendix A14.6 Technical Schedules 7 & 8
Comment	Consider decommissioning and aftercare impacts likely to be significant. Scale and nature of impacts should be assessed prior to planning determination.	Decommissioning considered in SEMP at Appendix A14.6 Technical Schedule 7

Response Status	Summary	Addendum Reference
Objection	Object until further principles of proposals for decommissioning and aftercare submitted. To include plan showing elements removed/left in situ.	Decommissioning considered in SEMP at Appendix A14.6 Technical Schedule 7
Condition	Decommissioning and Restoration Plan to be submitted and approved following commencement of construction works. To be regularly reviewed.	Decommissioning considered in SEMP at Appendix A14.6 Technical Schedule 8
Comment	Construction Method Statement to detail reinstatement methods including disturbance and reinstatement during operational phase and proposed pollution prevention measures.	Pollution prevention and management of reinstatement is considered in SEMP at Appendix A14.6
Recommendation	Responsible agency for Carbon Balance Calculation response awaiting determination therefore SEPA not currently in position to comment. However, recommend this issue be considered closely by the determining authority.	Revised carbon calculation presented in Chapter A16
Comment	Inconsistency in ES regarding payback periods.	Revised carbon calculation presented in Chapter A16
Comment	Payback period of 14.9 years is considered "neutral".	Revised carbon payback period presented in Chapter A16.8
Comment	HVDC not taken into account even though it is a material consideration.	Interconnector outside scope of ES. See Chapter A4.3
<b>SNH</b>		
Objection	Inadequate consideration of likely adverse effects on Sandwater SSSI and lack of proposed mitigation regarding works outwith development boundary.	Chapters A10.2, A14.2 and A15.7; and Appendix A14.6
Condition	Road alterations must take place to north side of existing B9075.	Chapter A15.7
Condition	Construction methods, pollution prevention measures and details of water crossings to be agreed with SEPA.	Appendix A14.6 Technical Schedule 2
Condition	Measures to be implemented and controlled through Ecological Clerk of Works.	Appendix A14.6 Technical Schedule 8
Condition	Worker ablution and kitchen facilities in compounds to be in form of sealed units.	Worker facilities discussed in Appendix A14.6 Technical Schedule 2
Comment	Otter Survey findings consistent with SNH knowledge of area.	Updated assessment of impacts on Otters at Chapter A10.8
Condition	At end of each day pipe ends to be covered and planks placed in excavations and other construction holes.	Appendix A14.6 Technical Schedule 8
Condition	Advise that contractors are alerted of possible otter presence, EPS law, and action in event of holt discovery.	Appendix A14.6 Technical Schedule 8
Condition	Advise against application for EPS license.	Appendix A14.6 Technical Schedule 8
Objection	Magnitude of predicted impacts on red-throated diver, merlin, G plover, dunlin, whimbrel, A skua, lapwing, curlew and G skua.	Sections A11.8 (RTD); A11.11 (Merlin); All.13 (G plover); All.15 (Dunlin); All.17 (Whimbrel); A11.19 (A skua); A11.14 (Lapwing); A11.18 (Curlew); and A11.20 (G skua).

Response Status	Summary	Addendum Reference
Objection	Likely long term impacts on Favourable Conservation Status (FCS) of, merlin, G plover, dunlin, A skua, lapwing, curlew and G skua at Regional level.	Sections A11.11 (Merlin); All.13 (G plover); All.15 (Dunlin); A11.19 (A skua); A11.14 (Lapwing); A11.18 (Curlew); and A11.20 (G skua).
Objection	Likely long term impacts upon FCS of whimbrel and red-throated diver at Regional and National levels.	Sections A11.8 (RTD); and All.17 (Whimbrel).
Comment	May reconsider objection should concerns be addressed through revised ornithological assessment.	Fully revised ornithological assessment provided in Chapter A11, inc population modelling & rigorous assessment of T127 layout effects on FCS in Chapter A11; additive nature of impacts considered & addressed, esp. in assessment of collision risk & displacement in Chapter A11 following informal discussions with SNH; and benefits of mitigation fully explored in Chapter A11 & Appendix A10.9.
Comment	Given current evidence SNH position may remain one of objection even if additional work carried out.	The reassessment in relation to Ornithology is presented in Chapter A11 and Appendices A11.1 - A11.4
Comment	Ornithological sections currently insufficient to enable full comment on potential impacts or mitigation, including on wind farm size reduction.	The reassessment in relation to Ornithology is presented in Chapter A11 and Appendices A11.1 - A11.4, in which calculations on significance expanded and rationale explained. Population modelling also considered in detail in Appendix A11.4
Comment	Wind farm infrastructure needs incorporating on bird figures; disturbance to nesting birds likely to create significant challenge in meeting requirements of Wildlife & Countryside Act (1981).	Wind farm infrastructure added to all relevant figures accompanying chapter A11 and associated appendices. Bird Protection Plan (BPP) developed for site work, specifically to address WLC Act issues during breeding season.
Comment	Flight line maps for more bird species required.	Provided in Appendix A11.1
Comment	Brown & Shepherd reliability reduced as 2 rather than 3 field visits carried out. Provide more detail on derivation of confidence limits.	Chapter A11.5 and Appendix A11.1

Response Status	Summary	Addendum Reference
Comment	Clarify method by which 'Effective Total Detection Distance' (ETDD) calculated and detail calculations used to correct flight activity records.	Appendices A11.2 and A11.3
Comment	Explain how bird work and landform-association for whimbrel and golden plover informed final design and selection of turbine locations.	Landform studies, based around ' hot-spots' for whimbrel, were specifically used to target T127 layout changes to reduce potential effects. Resultant deleted turbines referenced in Chapter A4.2
Comment	Selection of Viewpoint locations questionable and details of VP watches not tabulated.	Appendices A11.2 and A11.3 in addition to revised figures.
Comment	Viewsheds deficient coverage. Some areas are outwith recommended 2km views.	Appendices A11.2 and A11.3
Comment	Calculation methods for flight occupancy rates not presented therefore cannot verify.	Appendices A11.2 and A11.3
Comment	If peat is spread or mounded along access tracks, direct impacts on habitat loss and land take need revising.	Peat figures referenced in Chapter A11 taken from revised figures in Chapter A14 and Appendix A14.4
Comment	Impacts of permanent and temporary guyed meteorological masts from habitat loss and collision risk not assessed. Serious omission.	Chapter A11.6
Comment	Lack of collision risk calculations/unusual presentation of calculations for guyed meteorological masts.	Appendix A11.3
Comment	Wrong avoidance rates used for collision risk modelling.	Appendix A11.3
Comment	Predicated mortality rates for golden plover, dunlin, arctic skua, lapwing, curlew and great skua detrimental at regional level, and for red-throated diver and whimbrel at regional and national levels (irrespective of avoidance rate).	Informed by population models as per Appendix A11.4
Comment	Categorisation of effects goes well beyond what agreed between SNH and the industry. Therefore, SNH are unable to agree to provisions of paragraph 11.6.3.	Chapter A11 and Appendix A11.4
Comment	Disturbance and collision effects presented contrary to SNH Guidance based on population dynamic approach.	Chapter A11 and Appendix A11.4
Comment	Significance of impacts made in isolation, without consideration of additive impacts. Operational disturbance and collision mortality effects should be analysed together with population models to examine overall effect upon FCS of regional and national populations.	Chapter A11 and Appendix A11.4
Comment	Disagree that impacts will be low or negligible significance for many species assessed within ES.	Revised impact assessment for all species presented in Chapter A11
Comment	Habitat Management Plan (HMP) unlikely to significantly reduce predicted impacts for many species, and may work against golden plover and whimbrel.	Fully revised HMP presented in Appendix A10.9
Comment	Bigger impacts anticipated than anywhere else e.g. Lewis is given as comparison.	Explanation provided in Chapter A11.5
Comment	Red-throated diver and whimbrel will be adversely affected at national and regional level.	Revised assessment provided in Chapter A11, with some mitigation outlined in Appendix 10.9 (HMP)

Response Status	Summary	Addendum Reference
Comment	Combined disturbance and collision risk mortality poses significant risk of long-term population decline for red-throated diver in Shetland and may cause national decline.	Revised assessment provided in Chapter A11, with some mitigation outlined in Appendix 10.9 (HMP)
Comment	Combined disturbance and collision risk mortality would add substantially to difficulty in reversing decline in national whimbrel population.	Revised assessment provided in Chapter A11, with some mitigation outlined in Appendix 10.9 (HMP)
Comment	No designated habitat interests in development boundary therefore SNH does not object. Series of recommendations to be agreed with SEPA as conditions of planning presented.	Recommendations covered in SEMP at Appendix 14.6
Condition	Issues bulleted in Vol.2, 10.6.1 (e) to be incorporated into Construction Method Statement. Reference to “waste peat mounding” should be deleted.	Appendix A14.6
Condition	Development and maintenance of Geotechnical Risk Register (Appendix 14.1, Section 5.2, page 63).	Geotechnical Clerk of Works required as part of SEMP, Appendix A14.6
Condition	List of measures outlined in Appendix 14.1, section 9, page 70 (‘Mitigation’), be incorporated into the Construction Methods Statement.	Use of Construction Method Statements is considered in the SEMP at Appendix A14.6
Condition	Environmental Management Plan (Vol. 2, 10.7.4).	Appendix A14.6A
Condition	Methods outlined in Vol. 2, 14.6.1.c (‘Stream Crossings’ paragraphs 5-9).	Appendix A14.6A Technical Schedule 5
Condition	Measures to reduce impacts of construction works on species and habitats outlined in Vol 2, 10.6.1e and 10.7.1-9.	Appendix A14.6A Technical Schedule 8
Comment	Only expect to be consulted on pollution monitoring activities and borrow pit waste workings where designated site/species affected.	Pollution monitoring method considered in SEMP at Appendix A14.6
Recommendation	Advises against use of non-native tree planting for screening. Other visual screening methods should be considered based on suitable design/location.	Chapter A8.7
Comment	Ecology chapter difficult to follow. Underestimates peat and habitat impacts.	Revised ecology assessment presented in Chapter A10
Comment	Number of inconsistencies and inaccuracies noted in ES, including with effect on carbon budget appraisal.	Revised methodology and input figures to carbon calculation presented in Chapter 16
Comment	Underestimation of impacts from turbine foundation excavation occurs throughout ES.	Revised peat excavation volumes presented in Appendix A14.4 and utilised throughout Addendum
Comment	Inconsistency in ES on width of double width construction tracks has significant implication regarding development footprint and impact assessment.	Chapter A4 Sections 4.2 and 4.6
Comment	No explanation of why double width tracks are required. Advises need for double width/potential for narrowing post construction be reviewed.	Chapter A4.2

Response Status	Summary	Addendum Reference
Comment	Requires resolution of inconsistency in operational track width to enable assessment of impacts.	Chapter A4.2
Comment	Advises greater consistency required in describing construction methods particularly for floating roads. Inconsistency affects impact assessment.	Floating track construction considered in Chapter A14.7 and Appendix A14.6 Technical Schedule 6
Comment	Advises turves not be removed from beneath or adjacent to floating tracks.	Floating track construction considered in Chapter A14.7 and Appendix A14.6 Technical Schedule 6
Comment	Confirm dimensions of crane pads.	Total excavated hard standing area for crane pads is provided in Appendix A14.4
Comment	Footprint greater than that stated. Recalculation to include substations, laydown spaces and control buildings.	Revised footprint presented in Chapter A4.6
Comment	Habitat loss figures inconsistent and unverifiable. Advise presentation of transparent and consistent approach.	Chapter A10.8
Comment	It is advised that figure provided for area of impacted land is not relevant.	Revised habitat assessment presented in Chapter A10
Condition	Commitment to stated mitigation measures unclear, therefore recommend inclusion of planning conditions.	Appendix A10.9
Comment	Assessment based on full adoption of mitigation measures denies assessment of worst case scenario and evaluation of mitigation effectiveness. Advise that more transparent approach adopted.	Addendum chapters A8 - A19
Comment	Table 10.18 incomplete as should include 0.28ha of Acid Flush.	Revised habitat assessment presented in Chapter A10
Recommendation	Advises no mounding of waste peat take place as may cause habitat smothering and sediment run-off.	Appendix A14.6 Technical Schedule 7
Comment	Magnitude assumptions incorporated in cumulative assessment are incorrect; multiple low magnitude impacts can have larger cumulative effect.	Soil and water impacts reconsidered in Chapter A14.
Comment	Clarification required for mitigation sentence 'Reduce negative impacts that could not be avoided'.	Soil and water impacts reconsidered in Chapter A14.
Recommendation	Clay bunds to be placed in all cable trenches to minimise groundwater flow.	General commitment to excavation mitigation presented in SEMP at Appendix A14.6 Technical Schedule 7
Comment	Section 10.76 reference to no mounding or spreading of waste peat in track side areas is inconsistent with Section 10.6.3.	Reinstatement of excavated peat considered in SEMP at Appendix A14.6 Technical Schedule 7
Comment	Disputes HMP claim that twice area of blanket bog lost will be compensated as compensation plan does not include all habitats. Clarification required why 179ha not 238ha compensated. Neutral compensation response not only based on 'hectare for hectare' replacement. HMP does not propose 394ha compensation.	Revised HMP is presented at Appendix 10.9
Recommendation	Examine impact of fences on issues including tracking erosion along fence line.	Peat management and restoration techniques considered in the revised HMP at Appendix 10.9

Response Status	Summary	Addendum Reference
Comment	Sheep stocking densities high; removal of sheep in winter preferred.	Peat management and restoration techniques considered in the revised HMP at Appendix 10.9
Recommendation	Sandbags of natural fibre or man-made? Advises selection of all materials on sustainability/ visual intrusion basis.	Restoration techniques considered in the revised HMP at Appendix 10.9
Comment	Damming many small gullies more effective than damming few large ones.	Peat restoration techniques considered in the revised HMP at Appendix 10.9
Recommendation	Enlargement of existing/creation of new lochans is high risk. Advise only considered after safeguarding/restoration of existing lochans has demonstrably failed.	Lochan restoration techniques considered in the revised HMP at Appendix 10.9
Comment	Evaluation process and success criteria for trials to be established prior to commencement.	Pilot area considered in the revised HMP at Appendix 10.9
Comment	Selection of compensation area size based on footprint queried. Numerical approach not favoured but, if adopted, larger compensation area than that proposed is required.	Compensation area considered in the revised HMP at Appendix 10.9
Comment	Unclear how goodwill and cooperation of landowners be secured in appropriate time periods. Advise if land agreements cannot be made then suitable alternatives should be found on Shetland.	Addressed in the revised HMP at Appendix 10.9; also in Chapter A10.7
Recommendation	Ensure floating track stability and enable water flow given potential for large size aggregate to compromise effective interlock.	Floating track construction considered in Chapter A14.7 and Appendix A14.6 Technical Schedule 6
Recommendation	Upslope cut off drains should be restored once potential for surface flow compromise of construction activity ceases. Low ground pressure vehicles to be used in installation/re-instatement.	Appendix A14.6 Technical Schedules 6 & 7
Comment	Unclear what bracketed figures in Table 5, Page 58 of peat stability report mean.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Recommendation	Advises Geotechnical Risk Register acknowledge baseline and additional risk, and that suitable mitigation developed for later.	Geotechnical Clerk of Works required as part of SEMP, Appendix A14.6
Comment	Clarify selection for further discussion of grid cells assigned Significant and Substantial Hazard Rankings.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Recommendation	Define 'intense and prolonged rainfall events' term regarding peat stability.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)

Response Status	Summary	Addendum Reference
Recommendation	Option more complex than presented for peat use as domestic fuel. Recommends further investigation before pursuing.	Appendix A14.4
Comment	No remit to advise on carbon budget calculation however advice provided on inconsistencies in ecological assessment are relevant and may help evaluate validity of input parameters to carbon budget model.	Revised carbon calculation presented in Chapter A16. Revised ecological assessment at Chapter A10 and new HMP at appendix 10.9
Condition	Advises condition of planning requiring employment of at least one independent full-time suitably qualified/experienced site-based Ecological Clerk of Works per wind farm sector, overseen by Environmental Manager, all with authority to stop work.	The role of the EcOW is discussed in Appendix A14.6A Technical Schedule 8
Recommendation	Appropriate signage complying with Scottish Outdoor Access Code guidance should be used where access requires restriction for Health and Safety reasons.	Chapter A19.7
Recommendation	Additional consultation required in advance of decommission year. Additional survey work may be required.	Appendix A14.6 Technical Schedule 7
Comment	Keep SNH informed of relevant proposed modifications, conditions or legal agreements.	Roles and responsibilities for environmental management during construction are set out in the SEMP at Appendix A14.6
Objection	Current proposal exceeds landscape capacity with significant adverse effects on visual amenity. SNH objects to current proposal unless appropriate modifications can be made.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Landscape Capacity exceeded through extent of proposed development area.	Chapter A8 Sections A8.2 and A8.3
Comment	Proposed number of turbines would result in very high magnitude of change to landscape character and visual amenity.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	Groups of turbines equate to separate developments with associated cumulative impacts.	Chapter A8 Sections A8.2 and A8.3
Comment	Turbine layout doesn't effectively minimise Landscape and Visual impacts	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	Exceeds landscape capacity as per Land Use Consultants (LUC) 'Landscape Sensitivity and Capacity Study for Wind Farm Development on the Shetland Islands'.	Chapter A8 Sections A8.2 and A8.3
Comment	LUC study provides for maximum of 93 turbines over a wider area.	Chapter A8 Sections A8.2 and A8.3
Recommendation	Approximately 50 turbines require removing to alleviate impacts.	Recommendation not implemented in full. A4.2; A8.2
Recommendation	LUC study should guide wind farms layout and design to minimise impacts.	Chapter A8 Sections A8.2 and A8.3

Response Status	Summary	Addendum Reference
Comment	NPPG 14, SPP6 and PAN45 considered relevant national policy for landscape and visual impact assessment.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	Wind farm considered to transform landscape character. Not just 'landscape with wind farms' but a 'wind farm landscape'.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	5 LUC study compartments appraised against 4 Viking wind farm development areas. LUC area H can accommodate 25 turbines (30 proposed); area J 25 turbines (39 proposed); area K 25 turbines (50 proposed); area M 6 turbines (11 proposed); and area N 12 turbines (20 proposed).	Chapter A8 Sections A8.2 and A8.3
Comment	Wind farm exceeds landscape capacity in each of 5 LUC areas.	Chapter A8 Sections A8.2 and A8.3
Comment	Proposed development substantially exceeds landscapes capacity.	Chapter A8 Sections A8.2 and A8.3
Comment	Impact of the current proposals on visual amenity would be substantial.	Chapter A9 Sections A8.8 and A8.9
Comment	Current proposal fails national policy tests. Scale, siting and design do not take full account of landscape character; environmental and cumulative impacts have not been addressed satisfactorily; and proposals clearly conflict with recent LUC study.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	Significant adverse effects on Shetland National Scenic Area in conflict with NPPG14 and SPP6 Annex A.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	Zone of theoretical visibility (ZTV) mapping for proposed development shows turbines visible from almost all central land area of north Mainland Shetland and adjoining coasts. Higher ground and coasts and islands facing this area have views of more than 50 turbines.	The reassessment in terms of Landscape impacts is addressed in Chapter A8; SNH concerns regarding ZTV discussed in Appendix A9.3
Comment	Additional information for clarification requested at initial consultation provided.	N/A
Comment	ES weaknesses regarding design optimisation exercise, underestimation of landscape sensitivities, misleading visualisations, lack of detail of landscape fabric impacts, matrix for systematic impact significance identification, and underestimation and inconsistency in impact significance judgements.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	LUC study not referred to despite published prior to ES submission.	Chapter A8.3
Comment	LUC study used in SNH impact appraisal as more robust than brief sensitivity assessments in ES.	Chapter A8.3
Comment	ES underestimates extent and significance of landscape character impacts due to lower assumed landscape sensitivity levels.	The reassessment in terms of Landscape impacts is addressed in Chapter A8

Response Status	Summary	Addendum Reference
Comment	Comparison of LUC guidance and ES suggests significant siting, layout and design issues not satisfactorily addressed. Key issues in 7.8.	Chapter A8.3
Comment	Proposals fail to fully avoid impacts on NSA landscapes to the south and south-west.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Layout does not show focus on area of lower sensitivity e.g. Sullom Voe, area east of A970 road corridor, quarries.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Tendency to site turbines along ridge crests and close to summits, increasing prominence.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Proposed turbines likely to be out of scale with the Mid Kame ridge.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Inconsistent turbine layouts used in adjacent landscapes at Mid and East Kame.	Chapter A8 Sections A8.8 and A8.9
Comment	Turbines in North and South Nesting set relatively close to sensitive coastal landscapes and settlements.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Impacts on landscape fabric, e.g. from access tracks, borrow pits, construction compounds and substations, not explicitly assessed but almost certainly substantial.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	No details on proportion of existing tracks in total proposed track length, and not explained how borrow pit locations avoid/minimise visibility.	The reassessment in terms of Landscape impacts is addressed in Chapter A8. Reinstatement of borrow pits is discussed in Appendix A14.6 (SEMP)
Comment	Areas most likely affected by changes in fabric are northern and southern ends of Delting quadrant, Kergord quadrant and Mid Kame ridge, southern edge of Nesting quadrant, eastern flanks of Kergord quadrant and Petta Dale.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	No objection in respect of changes to landscape fabric. Advises however that cumulatively impacts on north Mainland likely to be substantial and widespread and should be considered in more detail.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Recommendation	Additional information on and assessment of impacts on landscape fabric should be provided.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Visual impacts widespread.	The reassessment in terms of Visual impacts is addressed in Chapter A9

Response Status	Summary	Addendum Reference
Comment	High proportions of significant visual impacts in ES may still be underestimates for viewpoints 18, 21, 22, 29, and 41.	The reassessment in terms of Visual impacts is addressed in Chapter A9
Comment	Separation distances are at or below the preferred lower limit of 2km separation for Aith, South Nesting, Voe/Hillside, Laxo and Brae.	The reassessment in terms of Visual impacts is addressed in Chapter A9
Comment	Impact significance underestimated for tourists and recreational countryside users as only walkers considered.	The reassessment in terms of Visual impacts is addressed in Chapter A9, and for Recreation and Tourism in Chapter A19
Comment	Visualisations presented only cover 90° whereas development will occupy 100-120° in many places and sometimes more.	Appendix A9.3
Comment	In some areas turbines visible from adjoining valley landscapes at very close range, e.g. Petta Dale and Valley of Kergord. Turbines to dwarf underlying landscape and enclose valleys.	The reassessment in terms of Visual impacts is addressed in Chapter A9
Comment	ZTV mapping not provided for access tracks, compounds substations and transmission lines.	The reassessment in terms of Visual impacts is addressed in Chapter A9
Comment	Cumulative impacts will be significant.	Chapter A9.8
Comment	SNH conclude impact of current proposals on visual amenity are significant for reasons outlined.	The reassessment in terms of Visual impacts is addressed in Chapter A9
Comment	Slight to moderate' impact finding in relation to Dunrossness and the Deeps area of National Scenic Area (NSA) underestimated, suggest 'moderate' impact.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Negligible' impact finding for Muckle Roe should be 'slight to moderate'.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Slight to moderate' impact finding for Esha Ness part of NSA OK although suggest 'moderate' in localised areas.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Negligible' impact finding for Uyea Isle and Fethaland part of NSA should be 'slight'.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Overall, impacts on NSA's underestimated.	The reassessment in terms of Landscape impacts is addressed in Chapter A8
Comment	Will be some adverse effects on NSA but not basis for objection.	The reassessment in terms of Landscape impacts is addressed in Chapter A8

Response Status	Summary	Addendum Reference
Comment	Viking wind farm would itself bring significant cumulative impacts, irrespective of other developments. Each of turbine groupings comparable to 'large' wind farm.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	Impacts arising from combined, successive and sequential visibility of the turbine groupings would be extremely widespread. Guidance states cumulative impacts should be considered in design.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	No cumulative Impact assessment included and is required for effective design optimisation.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	Substantial adverse cumulative impacts likely in a number of areas, potentially affecting most of the key routes in and around north Mainland Shetland.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	SNH does not object in relation to cumulative impacts.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	Design Principles for mitigation not always successfully applied.	Revisions to landscape and visual mitigation discussed in Chapter A8.7 and Chapter A9.7
Comment	Sets out main priorities for improved siting, layout and design of wind farm.	Revisions to the design and layout of the wind farm are presented in Chapter A4.
Comment	Consider relating turbines more closely to development at Sullom Voe.	Revisions to the turbine layout of the wind farm is presented in Chapter A4.
Comment	Offset more turbines from upland edge, especially above roads and settlements.	Revisions to the turbine layout of the wind farm are presented in Chapter A4.
Comment	Further reduce impacts on NSA land at Dunrossness and the Deeps to the south.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Comment	Reduce impacts on the setting of the designed landscape at Lunna House.	Chapter A9.8
Comment	Remove turbines from the Mid Kame ridge.	Deleted turbines and reasons for deletion provided in Chapter A4.2

Response Status	Summary	Addendum Reference
Comment	Remove some of most prominent turbines in other areas to reduce the extent and scale of impacts overall.	Deleted turbines and reasons for deletion provided in Chapter A4.2
Comment	Remove turbines: Delting: D1-3 and D31-33; Collafirth: C43 to 41; Nesting: N90-91, N106-109, N127-128, N142 and N149; Kergord: K57, K59, K68, K71, K76-77, and K78-88.	Deleted turbines and reasons for deletion provided in Chapter A4.2
Comment	Impacts of access tracks, borrow pits, compounds and substations require assessing and mitigation adopting, particularly for access track construction at upland edges, notably at Valley of Kergord.	The reassessment in terms of Visual impacts is addressed in Chapter A9
Condition	Inclusion of transformers in transmission towers should be a condition of consent.	The reassessment in terms of Landscape impacts is addressed in Chapter A8 and Visual impacts in Chapter A9
Recommendation	Strongly advise against mitigating visual impacts through woodland screen planting.	Chapter A8.7
<b>Shetland Islands Council Environmental Health Service</b>		
Comment	Shetland Islands Council (SIC) Environmental Health Service (EHS) response in relation to 4 categories; Local Air Quality Management (The Environment Act 1995, Part IV), Statutory Nuisances (The Environmental Protection Act 1990, Part III); Private Water Supplies (The Private Water Supplies (Scotland) Regulations 2006); and Contaminated Land (The Environment Act 1995, Part II).	LAQM related assessment is provided in Chapter A16; statutory nuisances in Chapter A12, Chapter A16 and Appendix A14.6; PWS in Chapter A14 and Appendix A14.6; and Contaminated Land is covered within Soils and water Chapter A14 and Appendix A14.6.
Comment	Insufficient detail and information provided in ES to enable drawing of conclusions.	Updated information is provided in Chapters A12, A14, A16 and Appendix A14.6.
Recommendation	Construction liaison committee should be established in advance of construction phase and transform into an operational liaison committee. EHS should seek membership and be involved in drawing up terms of reference of this committee, to include complaint investigation protocols.	Construction activities are considered within the SEMP at Appendix A14.6
Comment	EHS would appreciate site of, and opportunity to comment on Health Impact Assessment.	Not covered in ES addendum.
Recommendation	Road disturbance by Total development at Sullom Voe may affect Viking project. Interaction between construction phases of both projects should be considered at early stage.	Chapter A15.7
Comment	Community consultation and information provision particularly important for proposal of this scale.	Chapters A1.1; and A1.2
Recommendation	Use DEFRA Local Air Quality Management Technical Guidance LAQM.TG(09), not superseded 2003 version referred to in 16.4.3(a).	Chapters A16.1; A16.2.
Recommendation	HGV volume increase over construction phase. Need to consider LAQM TG(09) Table A.3 – Roads with a high flow of buses and/or heavy goods vehicles.	LAQM TG (09) is considered in Chapter A16
Recommendation	Factor 1 in Table A.3 of TG(09) will not apply. Therefore no need to consider further criteria.	LAQM TG (09) is considered in Chapter A16

Response Status	Summary	Addendum Reference
Comment	Accurate prediction of PM10 concentrations difficult. Short-lived construction sites do not normally need to be considered for LAQM purposes.	Dust impacts are considered in Chapter A16
Recommendation	LAQM Technical Guidance TG(09) Box 5.10 (E) - fugitive or uncontrolled sources does not apply to individual borrow pits.	Chapter A16.1
Recommendation	Under LAQM.TG(09) dust from site haul roads(fugitive or uncontrolled sources) will affect, and dust monitoring will be required at two properties at Valleyfield, Brae, one at Whinnia Lea, Nesting and perhaps one at Setter House, Weisdale.	chapter A16.1; Appendix A14.6 Technical Schedule 2
Recommendation	Use BS 5228-1:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites for construction noise. All available techniques should be used to minimise, as far as is reasonably practicable, the level of noise to which persons in the neighbourhood of site operations will be exposed.	Chapter A12.4
Recommendation	ETSU-R-97, the Assessment & Rating of Noise from Wind Farms is main standard for operational noise. Given low background noise levels apply the lower 35 dB criterion for daytime noise limits.	Chapter A12.4; A12.5
Recommendation	Use BS4142:1997 Method for Rating Industrial Noise Affecting Mixed Residential and Industrial Areas for sub-station noise.	The noise impact assessment is provided in Chapter A12
Comment	No indication in Section 12.5.3 of any heavy/prolonged rainfall periods that could elevate background noise levels.	The revised noise impact assessment is provided in Chapter A12
Recommendation	Pre-notify residents of any necessary blasting works.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Recommendation	Consider necessity for blasting in selection of borrow pits.	Selection of borrow pits discussed in Chapter A4
Recommendation	Time blasting around resident preferences where possible and not before 10am or after 4pm, Monday to Friday and not at all at weekends.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Recommendation	Monitoring for vibration and blast overpressure should be carried out for every blast at the nearest sensitive receptor.	Chapter A12.7; also construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Comment	Clarify whether piling necessary. If piling required then further noise assessment necessary in agreement with EHS prior to works.	Chapter A12.6
Comment	Non-noisy work need not be confined to hours stated in ES. Detailed consultation with noise affected premises owner/occupiers could result in negotiated extended working hours.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Comment	No detail in ES regarding use of lighting.	Not explicitly covered, however construction activities and mitigation in place are considered within the SEMP at Appendix A14.6

Response Status	Summary	Addendum Reference
Recommendation	Adopt best practicable means to ensure artificial light from premises/stationary objects not cause statutory nuisance. Relevant statutory nuisance provisions are aimed at nuisance caused to persons in their home from intrusive artificial light.	Not explicitly covered, however construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Recommendation	Must assess where lighting could impact upon residential premises, particularly at night.	Not explicitly covered, however construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Comment	Scottish Government and Institution of Lighting Engineers have published relevant guidance documents.	Not explicitly covered, however construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Recommendation	Section 12.6.1 (b). Actual design, management and mitigation measures should be proposed and agreed prior to works commencing. Monitoring of noise at nearest noise sensitive receptors must be included in proposed measures.	Appendix A14.6 Technical Schedule 7
Comment	Some accesses to the quadrants of the site would not be suitable for construction traffic.	Chapter A15.6
Recommendation	Abnormal loads will be restricted to certain accesses, but other construction traffic should have designated routes to minimise disruption wherever practicable.	Chapter A15.7
Recommendation	Preferred route for non-abnormal load construction traffic is not stated and should be agreed prior to construction commencing.	Chapter A15.7
Comment	Access point numbers in ES Chapter 15 non-consecutive and inconsistent with figures 4.1.1 and 4.1.2.	Access points clarified in Chapter A15.6
Comment	Using Sullom Voe/Sella Ness and Greenhead/Dales Voe ports for material importation would reduce vehicle movement impacts, especially at village of Voe.	Chapter A15.7
Recommendation	Construction traffic should not use accesses off B9071 between setter and Gonfirth (Voe), B9075 between Skellister and Brettaber (Nesting), A970 between Wethersta and Sparl (Brae), and A971 at Scord of Sound, Weisdale.	Chapter A15.6
Condition	Warranty specified in 12.6.1(a) regarding correction under Joint Nordic Method must be included as condition of planning.	Not covered in ES Addendum however Viking are happy to accept as a condition of planning
Recommendation	Where vehicle reversing alarms would be audible at noise sensitive receptors, other methods of ensuring vehicle safety on site should be used.	Not explicitly covered, however construction activities and mitigation in place are considered within the SEMP at Appendix A14.6.
Recommendation	If utilising multiple borrow pits affecting a property, care required in considering cumulative noise effects (concurrent use), and ongoing noise effects (consecutive use).	Chapter A12.6
Recommendation	Amend 12.6.2(a). If concurrent use of multiple borrow pits affecting same property(ies) is likely then calculation of noise predictions required to include all noise sources.	Chapter A12.6

Response Status	Summary	Addendum Reference
Recommendation	Properties Tigh-na-Binn (derelict) & Whinnia Lea (occupied) particularly susceptible to noise from borrow pits due to proximity. Check no redevelopment scheduled at Tigh-na-Binn. Two pits affect Whinnia Lea so particular care required in consulting owner regarding work timings.	Chapter A12.6
Comment	Tables 12.12 to 12.17 require revision as cut-in speed of many turbines can be as low as 3m/s. ETSU-R-97 states noise levels below 12m/s meeting noise limits means it is most unlikely to cause any greater problem at higher wind speeds.	Revised noise impact assessment provided in Chapter A12
Recommendation	Predicted operational noise levels at noise sensitive receptors for wind speeds of 3,4 & 5 and 11 & 12m/s required. If cut-in wind speed greater than 3m/s then level should be stated and data at wind speeds lower than cut-in speed not required.	Revised noise impact assessment provided in Chapter A12
Comment	Clarify how vacant Upper Kergord property will be ensured. Could be used for accommodating temporary site staff for which it would not be considered a noise sensitive receptor.	Chapter A12.5
Comment	Tables 12.15 and 12.17. Exceeding limits at derelict Fern not relevant unless redevelopment planned.	Chapter A12.5
Recommendation	Submit and agree prior to development a statement addressing issue of noise limit accident at identified properties.	Updated noise mitigation measures provided in Chapter A12.7. Construction activities and mitigation in place are also considered within the SEMP at Appendix A14.6
Comment	Dust mitigation measures in 16.8.1 and 20.9 are not practicable in Shetland, e.g. Use of trees.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Recommendation	Dust Suppression Management Plan to be developed, agreed with EHS and implemented pre-works. Inclusion of off-site monitoring at properties near road sides/borrow pits required.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Recommendation	Dust monitoring programme to be proposed and agreed with EHS.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Condition	Contrary to 12.2.5, consent should require all issues be revisited and process agreed prior to start of decommissioning.	Decommissioning considered in SEMP at Appendix A14.6 Technical Schedule 7
Recommendation	Note results of 12.2.5, 12.6.3(b) and 12.6.3(c), regarding low frequency sound and vibration, are up to date. However request developer commit to undertaking remedial works should guidance affecting findings be updated in project lifespan.	Updated noise mitigation measures provided in Chapter A12.7. Construction activities and mitigation in place are also considered within the SEMP at Appendix A14.6
Comment	Noise from sub-stations not considered in ES. Noise from Larger sub-station at Upper Kergord should be considered.	Outside scope of ES. Sub-stations subject to separate planning application.

Response Status	Summary	Addendum Reference
Comment	Any southerly deviation from borrow pit search area near turbine D25 may increase potential for contamination of supply catchment for Dales View, Pond of Grutin.	Borrow pit search areas discussed in Chapter A4.3. Construction activities and mitigation in place are also considered within the SEMP at Appendix A14.6
Recommendation	Testing of Dales View and Gruten private water supplies should be undertaken to EHS agreed methodology and as per stated sampling regime.	PWS sampling discussed in Chapter A14.8 and Appendix A14.6 Technical Schedule 6
Recommendation	In event of adverse effects on private water supplies, bowsers/bottled water to be supplied to affected properties and EHS agreed remediation implemented.	Emergency response for water pollution incidents detailed in Appendix A14.6 Technical Schedule 6
Comment	Developer sampling costs not disproportionate to public benefit.	Water sampling discussed in Appendix A14.6 Technical Schedule 6
Comment	Contaminated Land only mentioned in one ES paragraph.	Soils issues discussed in chapter A14. Environmental management considered within the SEMP at Appendix A14.6
Recommendation	Material brought on site to be from reputable source.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6
Recommendation	Care to be taken where prior use (e.g. Dumping) is evident. Walkover required before excavation. If contamination identified cease work and contact EHS.	Excavation management considered in SEMP at Appendix A14.6 Technical Schedule 7
Recommendation	No contaminated land designated in Shetland however Graven, Hill of Scatsta/Hill of Trondavoe, Vallafeld (Brae), Scar Quilse, and Sandwater Quarry to be treated with caution.	Construction activities and mitigation in place are considered within the SEMP at Appendix A14.6, excavation issues at Technical Schedule 7
<b>Shetland Islands Council Marine Management</b>		
Comment	Comments on marine impacts requested and are not considered in ES. Constitutes major oversight as siltation/pollution impacts possible under certain conditions.	Management of impacts on watercourses feeding coastal areas considered within the SEMP at Appendix A14.6
Comment	Problem of widowing/orphaning of text, headings and tables.	New ES Addendum produced
Comment	Inaccuracies evident (e.g. Track width, turbine base footprint) and some lack of discussion regarding conclusions.	Revised measurements provided in Chapter A4 and reiterated throughout Addendum technical chapters.

Response Status	Summary	Addendum Reference
Comment	In many instances ES has not considered worse-case scenario.	Addendum chapters A8 - A19
Recommendation	Public road upgrading/altering impacts lacking. Work close to water courses requires careful consideration.	Chapter A15.7
Comment	No consideration of Fin Fish Farming as important local industry.	Economic importance of fishing discussed in Chapter A17
Comment	No consideration of potential impacts on marine environment or aquaculture that could result from large pollution incident/silt loading in burns under flood conditions.	Management of impacts on watercourses feeding coastal areas considered within the SEMP at Appendix A14.6
Recommendation	Potential impacts on marine environment/aquaculture should as minimum be considered for protected fishery sites at upper Busta Voe, Houb of Scatsta and Garth Voe, Dales Voe, upper Derry Voe, East Burra Firth and Weisdale Burn.	Management of impacts on watercourses feeding coastal areas considered within the SEMP at Appendix A14.6
Comment	Acknowledged majority of marine impacts associated with interconnector cable.	Interconnector outside scope of ES. See Chapter A4.3
Comment	Table 10.1 omits impacts on freshwater stream fauna.	Impacts on fish are considered in Chapter A10
Comment	10.4.3(b). Disagree maintaining habitats/species poor/degraded baseline status not desirable conservation objective. Further degradation could affect higher quality neighbouring habitats.	Impacts on aquatic habitats considered in Chapter A10
Recommendation	Assumption of no significant ecology cumulative impacts in section 10.6.3, due to low impact magnitude assessments, is false. Cumulative assessment should be reconsidered.	Cumulative ecology impacts considered in Chapter A10.8
Comment	10.5.4(a). Base rich flushes described are alkaline fens and protected.	Impacts on habitats are considered in Chapter A10
Comment	10.6.4(a). Insignificant impact conclusion unverifiable as no impact of habitat loss assessed for <i>Eudonia alpina</i> .	Impacts on habitats are considered in Chapter A10
Recommendation	Water course siltation likely over extended period with potential direct , cumulative effects on flora and fauna, particularly for salmonid fish. Effects may extend to marine environment under flood conditions. Issue requires addressing in ES.	Appendix A14.6
Recommendation	Additional surveys required pre-construction to establish fish density baseline due to high temporal variability.	Appendix A10.9
Comment	Coverage in excess of 30% of all watercourses that may be impacted seems more appropriate.	Impacts on aquatic habitat considered in Chapter A10.8 and construction activities and mitigation in place are also considered within the SEMP at Appendix A14.6
Comment	Discrepancy in depth of peat involved for cut track; 1.5m in ES, 1m in appendices.	Revised figure provided in Chapter A4.2 and within the SEMP at Appendix A14.6 Technical Schedule 7

Response Status	Summary	Addendum Reference
Comment	No possible areas or methods are identified for storage of peat on-site. Careful siting required to prevent habitat damage/pollution run-off. No off-site landfills identified.	Peat volumes and reinstatement techniques are considered in Appendices A14.4 and A14.6
Comment	No impact assessment of temporary and permanent masts on habitat loss.	Impacts on habitats are considered in Chapter A10
Comment	Main development effects on bird populations assessed in isolation. Should be considered accumulatively; likely additional species adversely affected under this method. Suspicion that impacted species pre-determined at scoping stage.	Ornithology impacts revised and considered in Chapter A11
Recommendation	Numerous HMP proposals unproven/not practicable for Shetland. Thousands of years for peat restoration not explicitly recognised. Restoration areas require careful scrutiny and monitoring.	Appendix A10.9
Comment	No consideration of fencing impact, notably installation.	Fencing impacts considered in HMP at Appendix A10.9
Recommendation	Loch enhancement work only as last resort due to increased impacts through siltation/ waste peat/ habitat loss etc. Greater consideration of impacts required.	Appendix A10.9
<b>Shetland Islands Council: Halcrow (Specialist input to peat slide risk)</b>		
Recommendation	Not all peat landslides identified especially Hill of Flamister.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Recommendation	Use aerial photos better.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Recommendation	Report should provide a comprehensive register (database and map) of hillslope peat landslide features across study area.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Recommendation	better explanation of method used for peat depth analysis.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)

Response Status	Summary	Addendum Reference
Recommendation	Qualitative methodology to be explained.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Recommendation	Further mitigation to be looked at during detailed design.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Recommendation	Need to clarify the selection, location and distribution of all surveys to demonstrate how comprehensive the report is.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Recommendation	Full borehole data to be appended.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)
Recommendation	Sensitivity of the infinite slope model to be shown.	No amendment made to peat stability report. Original report fit for purpose. Peat issues are discussed in more detail in Chapter A14 and Appendices A14.4 and A14.6 (SEMP)