

3. COMPARATIVE ENVIRONMENTAL ASSESSMENT

Executive Summary

Regulation 28 of the 2017 EIA Regulations requires that this EIA Report includes a description of “the main respects in which the developer considers that the likely significant effects on the environment of the proposed varied development would differ from those described in any EIA report or environmental statement, as the case may be, that was prepared in connection with the relevant section 36 consent.” This chapter provides a summary comparative environmental assessment to address the regulation 28 requirement, drawing together the conclusions from the topic chapters that follow (Chapter 4 – 13).

While regulation 28 makes reference to reporting how the effects of the proposed varied development would differ from those reported in previous environmental statements, it is noted that the Viking Wind Farm ES (2009) reported likely significant effects associated with a 150 turbine layout and the Viking Wind Farm ES Addendum (2010) reported likely significant effects associated with a 127 turbine layout. As a result, this EIA Report required the completion of a three-step process. The first step for this EIA Report was the assessment of likely significant effects for the consented Viking Wind Farm (a 103 turbine layout). Following on from that, the second step was to assess the likely significant effects of the proposed varied development, and finally the third step was to assess how the effects of the proposed varied development differ from those associated with the consented Viking Wind Farm.

The assessment of the consented Viking Wind Farm and the proposed varied development has been prepared with reference to baseline information collected and presented as part of the ES and the ES Addendum, subject to updates where this was deemed to be necessary and proportionate. The EIA Report then provides an assessment of the effects of the proposed varied development in the context of the same baseline.

On the basis that the footprint of the proposed varied development is the same as the consented Viking Wind Farm, the potential for a difference in environmental effects is limited to either where material changes in the baseline are likely to have occurred, and/or where effects are related to the tip height or rotor diameter of the proposed turbines. The main potential environmental effects were identified through the assessment, based on the previous ES and ES Addendum and based on a review of the baseline, where necessary, as being landscape and visual, ornithology, noise and socioeconomics. In summary, significant residual effects were identified for the consented Viking Wind Farm as being limited to landscape and visual amenity receptors (see chapter 4 of the EIA Report). In addition, locally significant beneficial residual effects were identified for socioeconomic receptors for the consented Viking Wind Farm. All other potentially significant environmental effects were considered to be subject to suitable mitigation, such that there would be no significant residual effects.

The assessment of the proposed varied development confirms that the same significant effects would arise. Overall, while there would be some increase in the magnitude of effects, relative to the consented Viking Wind Farm, the change is considered to be negligible or small for the majority of factors and thus doesn't change the conclusion reached for the consented Viking Wind Farm.

The effects identified for the proposed varied development differ materially from the consented Viking Wind Farm in respect of the requirement to implement a scheme of aviation warning lighting. Current regulations¹ requires 'en-route obstacles' taller than 150 m to be provided with aviation lighting scheme. The assessment presented in Chapter 4: Landscape and Visual identifies the potential for significant visual effects when aviation lighting is switched on. It is noted that the

¹ The Air Navigation Order 2016, URL: <http://www.legislation.gov.uk/uksi/2016/765/contents/made>

Applicant would seek to agree suitable lighting scheme with the planning authority in consultation with the Scatsta Airport Operator and the Civil Aviation Authority (CAA) that would limit the times at which lighting would be required in order to reduce the duration (and significance) of the effect.

3.1 Summary of Potential for Significant Effects as a Result of Proposed Changes

3.1.1 Table 3.1 provides a summary of the likely significant environmental effects identified for the consented Viking Wind Farm, and the potential for material change/significant effects associated with the proposed varied development. The difference as a result of the proposed change to the turbine tip height from the previously consented 145 m to 155 m (and the associated change in rotor diameter) is provided in the 'conclusion' column. A cross reference is provided where relevant to additional supporting detail. Table 3.1 is structured to provide a row for each of the factors considered by the ES and ES Addendum.

3.1.2 In addition, it is acknowledged that other factors were introduced under Regulation 4(3), 4(4) and Schedule 4 of the 2017 EIA Regulations, which were not required in the ES and ES Addendum. Table 3.2 describes how this EIA Report addresses the factors introduced by the 2017 EIA Regulations.

Table 3.1: Summary Comparison of Effects of the Consented Viking Windfarm Compared to Proposed Varied Development

Technical Chapter	Consented Wind Farm – Likely Effects	Potential for Material Change/Significant Effects of Proposed Varied Development	Conclusion
<p>Chapter 4 - Landscape and Visual Amenity</p>	<p><i>Landscape Effects</i></p> <p>No Significant Effects upon on nationally designated or protected sites such as the National Scenic Areas or Gardens and Designed Landscapes.</p> <p>Significant Effects upon the two locally designated cLLAs closest to the consented Viking Wind Farm; Weisdale and Gletness & Skellister, (not in existence when the 2009 LVIA for the Viking ES Application was published).</p> <p>Significant Effects upon a number of LCAs within the 16 km study area.</p> <p>East and West Kame LCA (A2), where a majority of the turbines would be situated, the magnitude of direct change would be such that moderate to major adverse landscape effects would be experienced. Indirect effects would be moderate and significant.</p> <p>Significant (major) effects would also be experienced for part of the Peatland and Moorland Inland Valleys landscape character type where the consented Viking Wind Farm would be located (Pettadale and Kergord LCA; D4a).</p> <p>Moderate direct and indirect (significant) adverse landscape effects would be experienced by Coastal Crofting and Grazing Lands (E3) and the Scattered Settlements/ Crofting and Grazing Land (F5) LCAs. However, it should be noted that due to the widespread occurrence of these LCAs within the study area effects range down to</p>	<p>Examination of comparative Zone of Theoretical Visibility diagram (ZTV) confirms that changes are very localised and limited to areas ranging from 18 – 32 km from the site.</p> <p>Examination of the wirelines and updated baseline photography confirms that the additional visibility resulting from the proposed 10 m increase in turbine height, is unlikely to result in a significant change compared to the originally assessed level of effect.</p> <p>The tip height increase would require visible aviation lighting on each turbine. This lighting has the potential to result in significant adverse effects on visual amenity.</p>	<p>A review of the likely landscape, visual and cumulative landscape and visual effects for the proposed varied development has confirmed that there would be no change to the likely significant effects identified for the consented Viking Wind Farm.</p> <p>This EIA Report has identified that the night time effects of the proposed varied development would differ from the consented Viking Farm due to the requirement for aviation lighting, which without mitigation would result in significant effects for viewpoints considered within 9 km when lights are switched on.</p> <p>Further assessment to support conclusion is presented in Chapter 4 of this EIA report.</p>

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	<p>minor-moderate and minor depending on distance from the consented Viking Wind Farm and significant effects are likely to be experienced only up to around 10 km.</p> <p>Indirect significant adverse landscape effects ranging from moderate, to moderate – major would also be experienced in part of the Farmed and Settled Inland Valleys (Weisdale, D1a), the Crofting and Grazing Inland Valleys: (Cuckron,D2) and the Farmed Land (E1), local character areas.</p> <p>No Significant Effects are likely on approximately two-thirds of the LCAs within the study area.</p> <p>Visual Effects</p> <p>17 key VPs considered for the consented Viking Wind Farm LVA, 13 of the representative receptor locations were found to receive significant visual effects as result of the consented Viking Wind Farm as follows:</p> <ul style="list-style-type: none"> • VP1: Burn of Lunklet (Major); • VP2: Aith Pier (Moderate – Major); • VP3: Kergord Valley (Weisdale Mill) (Major); • VP6: North Nesting (Laxfirth) (Moderate – Major); • VP7: South Nesting (Major); • VP8: A971 between Bixter and Walls (Moderate – Major); • VP9: Near Voe (car park at Laxo Road Junction (Moderate – Major); • VP10: Vidlin (Moderate); • VP11: Whalsay (Clate) (Moderate – Major); • VP12: A970 Kames (Major); 		
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	<ul style="list-style-type: none"> • VP15: Mulla, Voe (Major); • VP16: Laxo (Major); and • VP17: Heglibister (Moderate – Major). <p><i>Cumulative Effects</i></p> <p>Significant cumulative effects on nine of 24 landscape character areas/designations considered.</p> <p>Significant cumulative effects on three of the 17 viewpoints (VP10: Vidlin; VP11:Whalsay (Clate); and VP12: A970, Kames.)..</p>		
<p>Chapter 5 - Ornithology</p>	<p>Negligible magnitude (not significant) habitat loss.</p> <p>Negligible or low magnitude (not significant) construction stage disturbance effect for all species.</p> <p>Negligible, low or low-moderate magnitude (not significant) operational stage disturbance effect for all species except merlin and whimbrel.</p> <p>Without mitigation, significant operational disturbance effects are predicted for merlin and whimbrel; however, following the implementation of the proposed Habitat Management Plan (HMP), no significant residual effects remain.</p>	<p>The changes potentially increase the potential for bird collision risk as the turbines will occupy a larger volume of air space. However, the proposed minimum rotor ground clearance remains unchanged at 35 m above ground level. Maintaining the same ground clearance will limit the potential for increased collision risk because flight activity of all priority species is disproportionately concentrated in the lower air space (i.e. below 35 m).</p>	<p>Reassessment of the collision risk predictions concluded no change effects predicted for the consented Viking Wind Farm.</p> <p>Further evidence to support this conclusion is presented in the form of an updated assessment and collision risk modelling: presented in Chapter 5 (Ornithology) and Technical Appendix 5.1.</p>
<p>Chapter 6 - Noise</p>	<p>Negligible to minor, short term, temporary (not significant) noise effects predicted for the construction phase.</p> <p>Turbines would operate within the ETSU-R-97 limits (not significant).</p>	<p>Increased turbine dimensions could be associated with a wider range of turbines which may be used, some of which could have higher noise emissions than previously assumed. Updated baseline noise monitoring and noise modelling to take account of micro-turbines that have become operational since the ES and ES Addendum were prepared has identified that the combined cumulative effects of</p>	<p>A review of the potential for operational noise effects has been completed taking account of updated Institute of Acoustics Good Practice Guidelines (IOA GPG). The proposed varied development would operate within the appropriate ETSU-R-97 limits, therefore, the effect of the proposed varied development is negligible and not</p>

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		operational wind turbines on residential amenity is significant for some receptors; however, the additional cumulative effect of the proposed varied development is negligible and not significant. The proposed varied development would operate within the ETSU-R-97 noise limits.	significant is there is no difference when compared to the consented Viking Wind Farm. Further evidence to support this conclusion is presented in Chapter 6 of this report.
Chapter 7 - Aviation and Telecommunications	No significant effects following the implementation of mitigation for aviation, telecommunications, television or radio.	The only change in relation to aviation and telecommunications relates to the additional requirement for aviation warning lighting for the proposed varied development due to the maximum tip height exceeding 150m. The Applicant would seek to agree suitable lighting scheme with the planning authority in consultation with the Scatsta Airport Operator and the Civil Aviation Authority (CAA) as part of agreeing an Aviation Mitigation Scheme (as required by Condition 7 (annex 2, part 1) of the relevant section 36 consent).	On the basis that the proposed varied development would agree an Aviation Mitigation Scheme, there would be no significant effects on aviation operations, and there would be no difference between the consented Viking Wind Farm and the proposed varied development. The same mitigation measures would be implemented for the proposed varied development (as for the consented Viking Wind Farm), which will ensure no significant effects on existing telecommunications and microwave links. On this basis there is no difference in the effects associated with the consented Viking Wind Farm and the proposed varied development. Based on implementing the same mitigation (as for the consented Viking Wind Farm), no significant effects on television or radio reception are identified for the proposed varied development and there would be no difference between the consented Viking Wind Farm and proposed varied development.
Chapter 8 - Ecology	The valued non-avian ecological receptors considered under residual impacts include all the designated sites, habitats and vegetation communities and species (otter, terrestrial invertebrates, freshwater macro-invertebrates, trout and salmon) identified within this chapter.	The footprint of proposed varied development would not change from the consented Viking Wind Farm. No material changes in the baseline are anticipated, therefore there would be no additional significant effects on ecological features.	Given that the footprint of the proposed varied development does not differ from the consented Viking Wind Farm, there would no significant adverse residual effects for non-avian ecological receptors and there would be no difference in the likely significant ecological effects.

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	<p>No significant adverse residual effects are predicted for these non-avian ecological receptors.</p> <p>Local adverse impacts, in terms of direct habitat loss to blanket bog of regional to national value will occur within the Viking study area. Measures to deliver compensation and ecological enhancement have been included a Habitat Management Plan, which includes the restoration of 260 hectares of degraded blanket bog (three times the area of habitat loss).</p>		
Chapter 9 – Hydrology, Hydrogeology, Geology, Soils and Peat	<p>The assessment of the likely significant effects for the consented Viking Wind Farm concludes that following the consideration of proposed mitigation, including measures set out in a Site Environmental Management Plan (Technical Appendix 2.2.), all activities with potential to affect hydrology, hydrogeology, geology, soils and peat would be appropriately managed and there would be no significant effects.</p>	<p>The footprint of proposed varied development would not change from the consented Viking Wind Farm. No material changes in the baseline are anticipated, therefore no significant effects as a result of the construction, operation and decommissioning of the proposed varied development have been identified.</p>	<p>On the basis that the footprint of the proposed varied development is unchanged from the consented Viking Wind Farm, no significant effects are associated with proposed varied development and there is no difference between the likely significant effects reported upon in the ES and Addendum and the proposed varied development.).</p>
Chapter 10 - Access, Traffic & Transport	<p>Following the application of proposed mitigation measures, including an agreed Traffic Management Plan, no significant effects are predicted for the consented Viking Wind Farm.</p>	<p>No significant effects are expected from the proposed varied development because traffic movements are expected to be the same as for the consented Viking Wind Farm.</p>	<p>Assuming the application of the same mitigation (i.e. a Traffic Management Plan), there would be no significant effects associated with the proposed varied development; or, for the proposed varied development in combination with relevant cumulative wind farm developments. Furthermore, there would be no difference between the effects identified for the consented Viking Wind Farm and the proposed varied development.</p>
Chapter 11 - Cultural Heritage	<p>No significant impacts on the settings of individual nationally important heritage assets.</p> <p>Following the consideration of proposed mitigation, including the measures set out in the</p>	<p>The increase in tip height has been assessed as having a negligible impact on the magnitude of change to the setting of nationally important heritage assets.</p>	<p>Following the consideration of proposed mitigation, including the measures set out in the Archaeological Management Plan (Technical Appendix 11.4) the effects for the proposed varied development are</p>

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	Archaeological Management Plan (Technical Appendix 11.4) there would be no significant direct effects on known heritage assets by the consented Viking Wind Farm.	The proposed varied development does not result in any change in the footprint of the development, as such there would be no direct impacts associated with the proposed varied development.	the same as those predicted for the consented Viking Wind Farm, as such there would be no significant effects .
Chapter 12 - Shadow Flicker	No significant shadow flicker effects predicted during the operation phase. Non-significant residual effects may impact two buildings located within 10 turbine diameters (the study area), however if a valid complaint is made control systems (photosensitive monitor) will be installed to mitigate the effects.	The increased dimensions of the turbines in the proposed varied development have the potential to alter the shadow flicker caused by the project. The same properties were identified inside the new study area, however were below the guideline exposure levels, resulting in a non-significant impact. If a valid complaint is made, the same control systems (as per the consented Viking Wind Farm) would be installed to avoid the shadow flicker impact.	Both the consented and proposed varied development will give rise to no significant shadow flicker effects. Both have mitigation options in-place should a complaint be made regarding shadow flicker.
Chapter 13 - Socioeconomics	The assessment of the consented Viking Wind Farm identified: Locally significant short term beneficial effects during construction related to employment, contract value/awards in Shetland and local salary spend (and associated induced benefits). Locally significant long term beneficial effects duration operation associated with the community benefit funding.	The overall capital investment and community benefit fund are related to the proposed generation capacity. As such the benefits associated with capital investment and the community benefit fund would be enhanced with the proposed varied development. Although it is noted that the employment, skills and training benefits are likely to be the same for both the consented Viking Wind Farm and the proposed varied development, the purpose of the variation application is to improve the economics of the scheme in order to find a route to market, such that the likelihood of the socioeconomic benefits being realised is materially increased as a result of the proposed variation.	Both the consented and proposed varied development detail significant local benefit such that while the benefits are enhanced with the proposed varied development, the change is not considered to change the conclusion of the impact assessment.

Table 3.2: Assessment of Factors identified in Regulations 4(3), 4(4) and Schedule 4

Topic	Potential for Significant Effects
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<p>Population and Human Health</p>	<p>Potential impacts on population and human health of relevance to the proposed varied development include:</p> <ul style="list-style-type: none"> • Health and amenity impact associated with construction and operational noise, traffic and transport related effects, shadow flicker and visual amenity; and • Potential for impacts on recreational amenity and/or socioeconomic activity. <p>Noise, shadow flicker, visual amenity and socioeconomic effects are addressed in Table 3.1, with additional detailed assessment provided for visual effects (Chapter 4), noise (Chapter 6), shadow flicker (Chapter 12) and socioeconomic effects (Chapter 13). The proposed amendments to the consented Viking Wind Farm would not materially change the potential for significant effects on recreational amenity and therefore a separate assessment of recreational amenity is scoped out. Visual amenity for recreational receptors is addressed in the Landscape and Visual assessment.</p> <p>No significant source-pathway-receptor linkages have been identified for vibration, heat, light, radiation (including electromagnetic radiation) or waste disposal were identified, therefore there is no potential for nuisance or health effects related to these factors. On this basis, no additional environmental information is required to address the requirements of the 2017 EIA Regulations.</p>
<p>Biodiversity (in Particular Species and Habitats Protected under Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora)</p>	<p>The requirement to consider impacts on biodiversity is addressed in this EIA Report in Chapter 5: Ornithology and Chapter 8: Ecology. On this basis, no additional environmental information is required to address the requirements of the 2017 EIA Regulations.</p>
<p>Land and Soil (and Natural Resources Availability)</p>	<p>The potential impacts on geological receptors, peat and groundwater resources are considered in Chapter 9: Hydrology, Hydrogeology, Geology, Soils and Peat. The EIA Report also includes the peat landslide hazard and risk assessment (Technical Appendix 2.3) originally produced for the consented Viking Wind Farm, and a borrow pit assessment (Technical Appendix 2.5). On this basis, no additional environmental information is required to address the requirement of the 2017 EIA Regulations.</p>
<p>Water (and Natural Resource Availability)</p>	<p>The potential impacts on the water environment are considered in Chapter 9: Hydrology, Hydrogeology, Geology, Soils and Peat. On this basis, no additional environmental information is required to address the requirement of the 2017 EIA Regulations.</p>
<p>Air and Climate</p>	<p>The 2017 EIA Regulations require a consideration of climate change effects, both considering the greenhouse gas emissions, and the climate change vulnerability.</p> <p>Chapter 1 of this report confirms the enhanced benefits for reducing greenhouse gas emissions associated with the proposed variations by increasing the potential energy yield compared to the consented Viking Wind Farm. The carbon calculator results (see Technical Appendix 2.6) confirm that the proposed varied development would result in CO2 emissions savings of 0.5 million tonnes per year, resulting in a payback of less than 2 years (relative to a grid mix of electricity generation).</p>

Table 3.2: Assessment of Factors identified in Regulations 4(3), 4(4) and Schedule 4

	<p>The proposed varied development is not considered vulnerable to climate change induced changes to the future baseline (for example, the wind farm will be designed to be resilient to extreme weather). The EIA Report confirms that all drainage design will incorporate consideration of climate change scenarios for conveyance of surface water. No changes are proposed to the construction or operational footprint of the consented Viking Wind Farm. On this basis, no additional environmental information is required to address the requirements of the 2017 EIA Regulations.</p>
Material Assets, Cultural Heritage	<p>Chapter 11: Cultural Heritage, includes an assessment of the potential for significant effects (both direct and effects on setting) on material assets and cultural heritage including architectural and archaeological assets and historic landscape.</p> <p>On this basis, no additional environmental information is required to address the requirements of the 2017 EIA Regulations.</p>
Landscape	<p>Chapter 4: Landscape and Visual Amenity considers the potential impacts and potential cumulative impacts on landscape and visual, including landscape character types (LCT) and visual receptors.</p> <p>On this basis, no additional environmental information is required to address the requirements of the 2017 EIA Regulations.</p>
Major Accidents and Disasters	<p>The 2017 EIA Regulations require a consideration of the potential for effects or risks associated with major accidents or disasters (e.g. to human health, cultural heritage or the environment). This requirement is interpreted as requiring the consideration of low likelihood/ high consequence events which would result in serious harm or damage to environmental receptors. Relevant types of accident/disaster, given the predominantly rural context of the proposed varied development include:</p> <ul style="list-style-type: none"> • Severe weather events, including high winds, high rainfall leading to flooding, or extreme cold leading to heavy snow and ice loading; • Fire; • Traffic related accidents; and • Mass movement associated with ground instability. <p>Resilience in the event of severe weather and fire is a core component to the wind farm design and turbine design. The Applicant uses a remote operational control system (controller and SCADA systems), which allow both automated and remote user shutdown in order to protect assets in the event of extreme conditions including extreme high wind or ice loading. It is noted that the site is not considered to be vulnerable to flooding and extreme heavy snow is also likely to rare given the relatively low altitude of the site. With respect to protecting the safety of people, the Applicant operates to the highest standards for safety and health², including implementing strict protocols for risk assessment which includes consideration of severe weather, and site based ‘dynamic’ risk assessment which requires staff to stop work in the event that weather conditions become unsafe.</p> <p>Wind speeds are constantly measured by the nacelle based ultrasonic anemometers, which are permanently heated. There are typically two anemometers located on the nacelle roof, with redundancy that allows continued operation should one malfunction.</p>

² URL: http://sse.com/media/523780/SSE_Safety_and_Health_Policy_v301.pdf

Table 3.2: Assessment of Factors identified in Regulations 4(3), 4(4) and Schedule 4

	<p>The outputs from the anemometers are integrated into the controller and SCADA systems to inform and warn the operator. When wind speeds in excess of the cut-out wind speed (determined from the power curve) are experienced the turbine will enter an idle state by pitching the blades out of the prevailing wind. All turbine subsystems will then run in an auto mode configuration. This means the turbine is in a state ready for production until the wind speed falls below the level to cut back in, over a 10-minute average. When this occurs, the turbine is ready to resume generation and export power. The turbine yaw system will keep the turbine pointing upwind with the subsystems in the auto mode. In addition, rotor speed is constantly monitored to ensure that should any overspeed occur, then the turbine will automatically shut down by pitching the blades to stop position whilst the yaw remains active. Siting assessments and analysis of historic wind speed data will have determined the extreme wind speeds likely to be encountered on the site. The turbines proposed by the manufacturers will have been designed to operate within these conditions.</p> <p>Ice detection is performed by a software application, whereby ice build-up on the turbine blades is determined by comparing the actual performance data with the nominal turbine power curve. The software makes comparisons with pre-defined threshold levels or a low power (ice detection) power curve. When the performance levels drop below the reference thresholds an alarm is generated within the SCADA system to warn the operator. In this instance the system can be configured to pause the turbine or to continue operation at reduced power whilst displaying the level of icing severity. If the turbine is shut down by an icing event, then depending on the system installed it may be possible to carry out remote re-starting of the turbine when climatic conditions allow. Sometimes a manual start will be required. This will necessitate the operator going to the turbine, where a visual assessment of ice build-up can be made. When attempting to re-start the turbine it will be necessary to put an exclusion zone in place in case of any residual ice throw from the blades.</p> <p>In the event of fire, turbines are located a sufficient distance from settlements and scattered dwellings, such that there would be no significant risk to human health. Wild fire is not considered to have high consequence given the rural nature of the site (with no human population at risk). The turbines are fitted comprehensive fire detection and warning systems that are integrated to the control and SCADA systems to generate alarms, alert the operator and control the shutdown of the turbine. Smoke and heat detectors are located in the high-risk areas; all electrical panels and controller cabinets, above the switchgear, above the generator and over the high-speed brake disk. Depending on supplier the transformer enclosure will be monitored by smoke and heat detection or by arc flash detection for immediate shutdown and removal of electrical energy. The system will also close off air vents and stop all fans to reduce air intake to a potential fire and to prevent smoke and/or gasses from being circulated within the tower/nacelle. The weather screen and housing around the machinery in the nacelle is made of fibreglass reinforced laminated panels with fire-protecting properties. The design includes fully integrated lightning and EMC protection. Both the nacelle and the steel tower act as a Faraday cage thus preventing fire induced by lightning. The blades are fitted with multiple lightning receptors that conduct to the tower via a slipring arrangement. Any excess grease or spilled oil are gathered in reservoirs to be emptied during scheduled maintenance. The high-speed brake system is shielded around the moving parts to ensure that any sparks generated will not spread into the nacelle. The use of flammable materials has been eliminated wherever possible by design and halogen free (low smoke) cables are deployed.</p>
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Table 3.2: Assessment of Factors identified in Regulations 4(3), 4(4) and Schedule 4

	<p>All construction traffic would be managed in accordance with a detailed traffic management plan, to be agreed with Shetland Islands Council. The traffic management plan will aim to design out risk of accidents using mitigation measures outlines in Chapter 10: Access, Traffic and Transport.</p> <p>The site currently experiences periodic mass movement (peat instability) in the absence of any development. The risks associated with peat instability are addressed in this EIA Report in Technical Appendix 2.3 and therefore no further/separate assessment is required.</p> <p>No significant effects to human health, cultural heritage or the environment more generally have been identified associated with accidents and disasters. On this basis, no additional environmental information is required to address the requirements of the 2017 EIA Regulations.</p>
<p>Interaction Between Factors (Cumulative Effects)</p>	<p>The potential for cumulative effects and the potential for interaction between factors is addressed in each of the chapters (Chapter 4 – 13) of this EIA Report. Based on the information provided, no additional environmental information is required to address the requirement of the 2017 EIA Regulations.</p>