

Technical Appendix 1.1: Consultation Register

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1.1 Introduction

- 1.1.1 Consultation and engagement with stakeholders are an important part of the EIA process, with advice and input from key consultees being sought at the early design stages of a project, to inform decisions about the Proposed Development.
- 1.1.2 An EIA Scoping Report for the Proposed Development was issued to ECU on 5th March 2025. A Scoping Opinion was provided by ECU on 27th June 2025.
- 1.1.3 The responses, contained within the Scoping Opinion and all other pre-application-consultation (PAC), have been considered in detail during the EIA process.
- 1.1.4 This Technical Appendix provides detail of all consultation feedback received as part of the PAC process for the Proposed Development, as well as the Applicant’s response and details of how the comments have been addressed throughout the EIA process.

Table 1.1.1: Consultation Register

Consultee Name	Date	Topic	Consultee Response	Response
Pre-Scoping				
Statutory Consultees				
ECU	20/02/2025	ECU Form	Notification of New Project Form sent to ECU via email.	N/A
	24/03/2025	ECU Introduction Meeting	Meeting held with ECU to introduce the project and project team.	N/A
SIC	03/03/2025	Noise assessment methodology	"In response to an email from TNEI (06/02/2025 - 16430 - "Proposed Neshion Energy Park - Noise Consultation"), the council Environmental Health Officer (EHO) responded to confirm agreement with the proposed methodology. In particular, the EHO agreed to the following: - Scoping out of decommissioning noise; - Use of Total ETSU-R-97 Noise Limits based on the upper daytime fixed minimum noise limit of 40dB and a fixed limit of 43dB during the night; - The cumulative assessmnet and derivation of Site Specific Noise Limits for the Proposed Development will utilise available significant headroom with an appropriate margin +2dB above predicted noise levels; - The general monitoring locations proposed. The EHO advised that there were no other schemes which should be considered in the cumulative noie assesment and no other dwellings which should be considered in the assessment of noise impacts.	Noted.
Non-Statutory Consultees				
Atkins Realis	22/02/2024	Telecommunications	In response to an email sent on 19/02/2024 requesting confirmation as to whether the proposed layout at that time could affect any of the operational links in the area, and, if so, what the required minimum separation distance would be, Atkins Realis replied that they had no objection to the proposal.	Noted.
JRC	17/04/2025	JRC Exclusion Zone Report	A request for an Exclusion Zone analysis and report was submitted via email from the Applicant on 17/03/2025 ("Neshion Energy Park - JRC Proforma"). The Exclusion Zone Report for JRC confirmed that there is a scanning telemetry link which runs from Sullom Voe Gas Terminal substation to the Firth Substation. JRC advised that two turbines would unacceptably impact this link.	Noted. A mitigation study by JRC was commissioned by the Applicant on 06/06/2025.
SIC Sullom Voe Port	31/01/2025	Initial access jetty consultation	Meeting held between the SIC Sullom Voe Port Infrastructure team and Harbourmaster and the Applicant. The port team provided the Applicant with the specifications of the jetty and information on the adjacent lay down area. The port team confirmed that the jetty would be able to support the delivery of projected turbine components, however, they caveated this with the longevity of the jetty over the next five years.	Noted.
Scoping				
Statutory Consultees				
ECU	27/06/2025	General	Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in Annex A and Annex B.	Noted. This table provides a summary of all consultee comments at scoping and identifies how these have been addressed within the EIA Report.
		General Scope of Assessment	Scottish Ministers are satisfied with the scope of the EIA set out at Section 3 of the Scoping Report.	Noted.
		General Scope of Assessment	In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.	Noted.
		Proposed Development - Generating Stations	The proposed development set out in the Scoping Report refers to wind turbines, and other technologies including battery storage. Any application submitted under the Electricity Act 1989 requires to clearly set out the generation station(s) that consent is being sought for. For each generating station details of the proposal require to include but not limited to: - the scale of the development (dimensions of the wind turbines and battery storage) - components required for each generating station - minimum and maximum export capacity of megawatts and megawatt hours of electricity for battery storage	Noted. Chapter 2: Description of the Proposed Development (EIAR Volume 2) provides a description of the key elements of the Proposed Development.

Consultee Name	Date	Topic	Consultee Response	Response
		Water - Drinking Water Protected Areas and Scottish Water Assets	Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.	Noted. Scottish Water have been contacted to and have confirmed that there are no assets which may be affected by the Proposed Development. Chapter 8: Hydrology, Hydrogeology, Geology and Soils (EIAR Volume 2) includes details of the assessment on Drinking Water Protected Areas/Scottish Water Assets.
		Water - Private Water Supplies	Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.	Ramboll requested a PWS dataset from Shetland Islands Council (SIC). On 30/06/2025 SIC confirmed that there are no registered PWS within 2km of the Proposed Development.
		Ecology / Water - Fish Populations	Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provide generic scoping guidelines for onshore wind farm and overhead line development https://www2.gov.scot/Topics/marine/Salmon-TroutCoarse/Freshwater/Research/onshoreren) which outline how fish populations can be impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.	Noted. Marine Scotland's guidance has been followed.
		Ecology - Fish Populations	In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.	The potential impacts on Special Areas of Conservation (SAC) have been considered and are reported in Chapter 6: Ecology (EIAR Volume 2) .
		Ecology - Guidance	MD-SEDD also provide standing advice for onshore wind farm or overhead line development (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.	Noted. Marine Scotland's checklist has been submitted at the time of the application submission.
		Peat - PLHRA	Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868 , should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.	Noted. A PLHRA has been undertaken and is presented in Technical Appendix 8.6: Peat Landslide Hazard Risk Assessment (PLHRA) (EIAR Volume 4) .
		Seascape, Landscape and Visual - Viewpoints	The Scoping Report identified viewpoints at Table 4.1 to be assessed within the landscape and visual impact assessment. Shetland Island Council (SIC) considers the Scoping Report to be an appropriate basis to inform the preparation of an Environmental Report. Alternative viewpoints have been requested by Shetland Islands Council Natural Heritage Officer (SICNHC) for: VP13 Gluss Ayre, VP14 a minor road south of Sullom, VP16 A970 west of Brae, VP17 a minor road near Newhouse Lunna Ness. Additional viewpoints have been requested for Mossbank, Ollaberry, a layby on Lunning Road, a carpark at Skaw Golf Course and the A968.	Refer to SIC response below.
		Cultural Heritage – Viewpoints	Historic Environment Scotland (HES) advise producing wirelines where the assessment suggests physical or setting impacts could occur. HES requests additional visualisations from Crooksetter Hill, Graven chambered cairns and the Kames, coastal defence battery. HES request that a night-time lighting assessment be provided. HES also requests that West Sandwick North Haa and Lunna House are included in the assessment.	Refer to HES response below.
		Seascape, Landscape and Visual - Night-Time Visual Assessment	NatureScot (NS) requests a night-time visual assessment. As the maximum blade tip height of turbines exceeds 150m the LVIA as detailed in section 4 of the Scoping Report must include a robust Night Time Assessment with agreed viewpoints to consider the effects of aviation lighting and how the chosen lighting mitigates the effects	A night-time visual assessment in accordance with NatureScots current guidance has been undertaken and is reported in Chapter 4: Seascape Landscape and Visual Amenity (EIAR Volume 2) . This is accompanied by night visualisations for four night viewpoints.

Consultee Name	Date	Topic	Consultee Response	Response
		Noise - General	The noise assessment should be carried out in line with relevant legislation and standards as detailed in section 9 of the Scoping Report. The noise assessment report should be formatted as per Table 6.1 of the IOA "A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise".	Noted. The noise assessment has been carried out in line with relevant legislation and standards and is presented in Chapter 10: Noise (EIAR Volume 2) .
		Ornithology - General / Surveys	It is recommended by the Scottish Ministers that decisions on bird surveys –species, methodology, vantage points, viewsheds & duration - site specific & cumulative – should be made following discussion between the Company, NatureScot and the Royal Society for the Protection of Birds (RSPB) Scotland. NatureScot has noted that the boundary of the planned development overlaps with the boundary of the Yell Sound Coast Special Area of Conservation (SAC). NatureScot also noted that the Sullom Voe SAC lies directly adjacent to the development. The East Mainland Coast Special Protection Area (SPA) lies c. 1.8km to the southeast of the development site, and is a marine SPA protected for its non-breeding waterbirds. The Scottish Ministers recommend bird surveys must be carried out in relation to the qualifying features of the relevant SPAs / SACs.	Refer to NatureScot response below.
		Borrow Pits	Where borrow pits are proposed as a source of on-site aggregate they should be considered as part of the EIA process and included in the EIA report detailing information regarding their location, size and nature. Ultimately, it would be necessary to provide details of the proposed depth of the excavation compared to the actual topography and water table, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement, and details of the proposed restoration profile. The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the working. Information should cover the requirements set out in 'PAN 50: Controlling the Environmental Effects of Surface Mineral Workings'.	A borrow pit assessment has been prepared in accordance with the requirements set out in PAN 50 and is presented in Technical Appendix 2.2: Borrow Pit Assessment (EIAR Volume 4) .
		Major Accidents - Pipelines	Other consultee considerations include the Health and Safety Executive (HSE) which noted that the proposed development uses planning consultation zones for three major accident hazard pipelines. HSE suggests that the EIA should show that the operator of the pipelines has been consulted and the integrity of the pipelines is protected from development and operational works.	Refer to HSE response below.
		Telecommunication - Base Station Site	The Joint Radio Company (JRC) will likely object to the proposed development based on its impacts to the exclusion zone of a Base Station site. The Scottish Ministers recommend that the applicant discuss and agree mitigation with the JRC prior to submission of any forthcoming application.	Refer to JRC response below.
		Aviation - Saxa Vord	The Ministry of Defence (MoD) will likely object to the proposed development based on the turbines being detected by the AD radar at Remote Radar Head (RRH) Saxa Vord. The Scottish Ministers recommend that the applicant discuss and agree mitigation with the MoD prior to submission of any forthcoming application.	Refer to MoD response below.
		Ornithology - Decommissioning	The RSPB suggests that decommissioning impacts of the proposed development should be included in the EIA.	Refer to RSPB response below.
		Other Existing or Planned Infrastructure	The Scottish Ministers request that the company assess the impact of the proposed development on existing and/or planned infrastructure. In particular, the company should carry out the necessary assessments to confirm if any part of the proposed development is within the consultation zone of any of the following:- • a licenced explosives site; • gas (or any other) pipeline; • existing overhead electric lines; • underground cables; • water pipes; • telecommunications links.	Noted.
		Major Accidents / Human Health - Chemicals	Scottish Ministers request the company to assess if any flammable, toxic or explosive chemicals detailed in The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 would be stored on site in quantities such that a Hazardous Substances Consent would be required under section 2 of the Planning (Hazardous Substances) (Scotland) Act 1997.	Noted.
		General - Further Engagement	Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
		Mitigation - General	The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	Noted. Mitigation measures are identified within each technical chapter of the EIAR and have been summarised in a Chapter 14: Schedule of Mitigation (EIAR Volume 2) .
SIC	07/06/2025	General	The Planning Policies identified are considered appropriate. At the time of writing, I am not aware of any material considerations other than the guidance quoted. Shetland Islands Council have consulted with statutory bodies and others and would offer the following advice and answers to questions raised based on the comments received, which should also inform the Environmental Impact Assessment Report. <i>Scoping Responses from NatureScot, HES and SEPA referenced. These responses are discussed in the relevant rows within this tracker.</i>	Noted.
		Cultural Heritage	The Shetland Regional Archaeologist is broadly in agreement with the content of Chapter 5 but has the following comments to make in relation to points and questions raised. Please note that the Regional Archaeology Service has now transferred to Shetland Islands Council. There is limited value in looking at maps of Shetland which predate the Ordnance Survey maps, other than in the rare cases where estate maps exist. Shetland Archives can advise. However, there are various runs of vertical photographs including the RAF 1940s verticals and multiple more recent runs (including a 2012 run held at HES (previously RCAHMS)) and flood risk and contaminated land photos which I believe are held at Shetland Islands Council (although possibly in the Archives). All available aerial photographs, in particular stereoscopic vertical runs, should be interrogated. There may also be lidar data relating to flood risk or taken for other purposes in this area. Consideration should be given to supplementing the walkover survey (5.38) with drone footage - lidar/ geophysics / photography. These would potentially provide better coverage and in a fraction of the time which would be required to intensively walkover the area. The nature of the terrain means that unless the transects are very close together (in place 5m apart or less) it would be impossible to achieve comprehensive coverage. 5.3.9 Probable Significant Effects (incorrect use of "likely") Question 5.2 Forts and brochs beyond 10km have been scoped out of the ZTV on the assumption that their key views were coastal. However, there is a compelling piece of research in progress which show that intervisibility between brochs , at least sometimes took place via the land (eg Tumblin broch, Bixter) and that some of these glimpses of brochs are in surprising locations. Therefore brochs should be scoped in to a distance of 40km, or to the point at which the viewshed disappears. I would advise the archaeological consultants to speak to Brian Smith at Shetland Archives as to whether he has identified key views in this regard, which cross/ impinge on the development area	A visit to the Shetland Archives has been undertaken. A review of existing aerial photographs, map regression, and walkover survey of the Site has been undertaken to inform the assessment. There is no publicly available LiDAR for the site. Mitigation has been identified to allow the identification of any hitherto unknown remains which may survive on the site to allow for any impacts to be adequately mitigated if required. An initial assessment of potential setting effects to Scheduled forts and brochs up to 40km from the Site has been assessed using the bare earth ZTV, particularly for intervisibility between brochs. On 11/11/2025, further consultation has been undertaken with the Regional Archaeology Service to discuss the inclusion of any such broch in the assessment. No response was recieved at the time of writing. On 21/11/2025, Brian Smith at Shetland Archives was consulted on the brochs to be included in the setting assessment and was asked to provide advice on any intervisibility between the brochs which may contribute to their cultural significance. No response was recieved at the time of writing. Note that the use of the term "likely" for significant effects comes from the HES guidance that HES have specifically asked us to use (see response from HES).
		Cultural Heritage - Follow up on questions within Scoping Report	Q5.1 The proposed assessment methodology. I agree that the HER (referred to as the SMR) should be consulted as a matter of priority. HER numbers should be added to the Gazetteer in all case where there is an appropriate record. Question 5.3 I am satisfied that the Study Areas are suitable Question 5.4 Dependant on the outcome of further work related to brochs in the locality, further visualisations may be required.	Noted. HER numbers have been included in the Gazetteer as presented in Technical Appendix 5.4: Gazetteer (EIAR Volume 4) .
		Scottish Fire and Rescue Service (SFRS)	SFRS are assessing all BESS site applications at the moment and there has been a working group established to consolidate all our departments and provide unified responses to all applications. Until this group completes its work, NFCC Best Practice guidance on BESS should be followed.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
		Environmental Health - Noise and Vibration	The Environmental Health team have been consulted on this development, and have the following comments to make. Construction noise This will be reviewed when CEMP is submitted. The CEMP should be completed with the principal contractor and noise assessed using the standard set out in BS5228-1. Operational noise - wind turbines The ETSU-R-97 upper limit of 40dB(A) daytime and 43dB(A) night-time is appropriate and in line with other wind energy developments in the local authority area. I agree with the noise assessment stages set out in 9.3.11. Operational noise - other I agree that a BS4142 assessment should be undertaken, dependant on separation distances. Scoped out Decommissioning noise - A CEMP should be submitted at the time of decommissioning. This should be completed with the principal contractor at the time of decommissioning to ensure it meets the standards of that time. Vibration - It is likely this will be scoped out, however vibration may need to be considered if blasting is required. If blasting is required, this will need to be considered in the CEMP. Low-frequency noise and amplitude modulation - there is currently no advice from Scottish Government requiring the assessment of noise out with the scope of ETSU-R97. Therefore specific assessments for low-frequency noise and amplitude modulation can be scoped out. Any complaints regarding construction or operational noise will be investigated by the local authority under the Environmental Protection Act 1990 or Control of Pollution Act 1974. Operational data from the wind farm may be required to support any investigation.	Noted.
		Environmental Health - Shadow Flicker	I agree with the scope of the shadow flicker assessment.	Noted.
		Engineering - General Requirements	General requirements There are various stages during the approvals process when different levels of drainage information could be submitted, particularly if detailed design may only be developed at a later stage. In line with that I will outline here the suggested end stage that should be reached with an application, to give an idea of the general direction coverage should move towards during the extended process. The scoping report notes the proposals as: 2.2.2 The main elements of the Proposed Development would be as follows: • up to 10 Wind Turbine Generators (WTGs) with a maximum tip height of 200m; • permanent foundations supporting each WTG, and associated laydown and crane hardstanding areas at each wind turbine base; • a series of new on-site access tracks with associated watercourse crossings (where the final layout dictates), and associated turning heads and passing places; • underground power cables and fibreoptic communications cables, generally laid in trenches alongside access tracks; • an on-site substation, control building and provision for collection of meteorological data either by mast mounted equipment and sensors or remote sensing equipment; • additional grid connection infrastructure, such as substations and cabling; • temporary construction compounds and laydown areas; and • a BESS compound of approximately 0.25 ha within the site, including ancillary equipment and co-located with the onsite substation. 2.2.3 In addition ancillary works may be necessary such as: • extraction of rock from borrow pits; • temporary on-site concrete batching plant; and • off-site works to facilitate the delivery of abnormal loads (e.g. construction of over-run areas and temporary modification to street furniture etc).	Noted. Site drainage infrastructure would be implemented at detailed design stage and through the Construction Environmental Management Plan (CEMP). An Outline CEMP is provided in Technical Appendix 2.1: Outline Construction Environmental Management Plan (OCEMP) (EIAR Volume 4) .

Consultee Name	Date	Topic	Consultee Response	Response
			SUDs drainage is a requirement for all parts of the above proposed development which are not underground, under the Water Environment (Controlled Activities) Scotland regulations 2011 and also under NPF4 policy 22 and Local Development Plan policy WD3. Permanent areas of hard surface such as retained access tracks, hardstandings, buildings and any other areas not reinstated etc. should include drainage design meeting the SUDs requirements below. The base requirements for permanent drainage and flood risk matters can be summarised as: •The drainage design should include sufficient attenuation to at least reduce flows during 1 in 10 year rainfall events to the level which would have occurred on the greenfield site. •The drainage should ensure that no flood risk is created to buildings or infrastructure during rainfall events of up to 1 in 200 year return periods. •SUDs drainage should provide the required levels of water quality treatment. SEPA's requirement is that design to the above standards should be demonstrated by following the guidance and processes set out in Ciria's C753 document, "The SUDs Manual", and particularly the SUDs selection process in regard to water quality treatment set out in Chapter 26.	Noted. The CEMP would include construction drainage and pollution control measures. An Outline CEMP is provided in Technical Appendix 2.1: OCEMP (EIAR Volume 4).
		Engineering - Drainage during construction	The screening request does not include any specific information on drainage proposals, but states that: An Outline Construction Environmental Management Plan (CEMP) will also be submitted as part of the EIAR which will contain details of appropriate environmental management measures. In general I would consider this to be an acceptable approach, with a suitable CEMP being a way to cover particularly the construction phase drainage and pollution control issues. While construction phase works may include a more dynamic mixture of drainage approaches, with controls added and adapted as needed, I feel it would be useful to set out the overall performance specification required as part of a future CEMP document, which as above can be summarised as: •The drainage design should include sufficient attenuation to at least reduce flows during 1 in 10 year rainfall events to the level which would have occurred on the greenfield site. •The drainage should ensure that no flood risk is created to buildings or infrastructure during rainfall events of up to 1 in 200 year return periods. •SUDs drainage should provide the required levels of water quality treatment.	
		Engineering -Permanent Surface Water Drainage	Permanent development proposals that form a hard surface should include permanent SUDs drainage, with consideration of ongoing maintenance. SEPA's requirement is that design to the above standards should be demonstrated by following the guidance and processes set out in Ciria's C753 document, "The SUDs Manual", and particularly the SUDs selection process in regard to water quality treatment set out in Chapter 26. A road development would appear likely to have one common pollution hazard level for all of the hard areas noted, but if there are any permanent proposals with a higher hazard level those should be identified. The base requirements remain as noted above: •The drainage design should include sufficient attenuation to at least reduce flows during 1 in 10 year rainfall events to the level which would have occurred on the greenfield site. •The drainage should ensure that no flood risk is created to buildings or infrastructure during rainfall events of up to 1 in 200 year return periods. SUDs drainage should provide the required levels of water quality treatment. There may be opportunity to combine SUDs drainage with landscaping and/or peat restoration works, perhaps also with biodiversity gain aspects and I would suggest that the overall approach is considered at an early stage as it might impact on the chosen line for access tracks and/or the earthworks approach that best suits all of those aspects. In particular SUDs Filter Strips may be suitable forms of drainage for the proposed tracks where land levels on the downhill side of the track have been formed at or below track level. In contrast, areas where the track is constructed in cut create the need for different drainage design approaches. There may also be a benefit in considering seeking the approval of different, alternative, SUDs	

Consultee Name	Date	Topic	Consultee Response	Response
			standard details - so that any alterations needed during construction because of local conditions already have a range of pre-approved options to choose from, rather than having to seek amendments at that time. During all SUDs design the combination of drainage of clean surface water flows onto the development (which do not require SUDs drainage) and the drainage of the hard surfaces of the development itself (which do require SUDs drainage) should be considered, with regard to an effective design for construction, long term operation and maintenance.	
		Engineering - Surface Water Flood Risk	Consideration should be given to the behaviour of all other proposed drainage features during extreme flow conditions, and how they will interact with existing drainage and watercourses under those conditions. Particular concerns may include on-going inspection and maintenance regimes, effects of potential erosion and/or destabilisation of peat, flood risks from possible blockage of ditches and any resulting overflow routes. Overflows during extreme conditions are not prohibited, provided they can be shown to be accommodated without risk. In this case there may need to be consideration of downstream impacts on existing roads and private surface water drainage, particularly if any existing flow routes and/or catchments are altered. The report notes that "surface water flood risks would be accounted for during detailed drainage design" and while that is acceptable, there would be benefits in considering the big picture drainage issues while the site layout concept is being developed, rather than fixing proposals and then leaving the drainage issues to be designed around.	Noted. Surface water pathways and interactions with proposed infrastructure have been considered within Chapter 8: Hydrology, Hydrogeology, Geology and Soils (EIAR Volume 2).
		Engineering - Watercourse Flood Risk	Watercourse crossings appear likely to require registration or licencing from SEPA under the CAR regulations. That process will consider the individual and cumulative environmental impacts of the proposed engineering works, but the hydraulic performance will be considered as part of the planning process. Consideration should be given to the flood risk at each crossing for flows of up to the 1 in 200 year level. The design produced may choose to deal with extreme events by way of a controlled overflow, but where any flows exceed the design capacity of any burn crossings, it should be demonstrated how the resulting overflows would be accommodated without flood risk to buildings or infrastructure.	Noted. A schedule of watercourse crossings is presented in Technical Appendix 8.3: Watercourse Crossings Schedule (EIAR Volume 4).
		Flood Map Data	With regard to the above 2 sections, I would note that the submitted Figure 8.2 on flood risk appears to be using older SEPA flood map information. SEPA have recently released updated flood maps, which significantly improve surface water and small watercourse flood risk modelling in Shetland, as illustrated in the extract for the application area below, which better identifies areas where surface flows will occur through the site.	Noted. Updated SEPA flood maps have been used to inform the assessment presented in Chapter 8: Hydrology, Hydrogeology, Geology and Soils (EIAR Volume 2).
		Seascape, Landscape and Visual - General	We agree that landscape and visual effects should be scoped into the assessment. The "Landscape Character Types Map and Descriptions" (NatureScot, 2019) is referred to and we would agree that this is the correct baseline source. The LVIA should also review Slater, C., Shucksmith, R. (2021). The Shetland Coastal Character Assessment. Prepared by Shetland UHI on behalf of the Shetland Marine Planning Partnership. 44 coastal character areas are described in the Assessment. Of relevance to this proposal are 27. Yell Sound Coastal Character Area, also 26. Sullom Voe Coastal Character Area and 3. Lunna Ness Coastal Character Area. We note that areas of landscape designations and classifications have been identified and will require assessment. The proposed assessment methodology for landscape impacts is comprehensive.	Noted.
		Seascape, Landscape and Visual - Visual Receptors	Settlements at Ollaberry, Gluss and Fiblister should be included in the list (para 4.2.20).	Noted. Settlements considered in Chapter 4: Seascape, Landscape and Visual Amenity (EIAR Volume 2) have been based on the theoretical visiblity of the Proposed Development.

Consultee Name	Date	Topic	Consultee Response	Response
		Seascape, Landscape and Visual - Study Area	Q4.1: Are the study Areas for the SLVIA proposed acceptable and proportionate? Sufficient justification has not been provided for deviating from the NatureScot standard guidance on study area. That guidance advocates that a 30 km distance be used for turbines up to 100 m in height and 45 km for turbines of 150+ m. The current proposal is for up to 10 turbines of up to 200 m blade tip height. The applicant has proposed a 30 km study area but this is not 'appropriate and proportionate' to this scale of development. We advise that the NatureScot Guidance that advocates the adoption of a 45 km Study Area is followed. Figure 4.4 – theoretical visibility map indicates that in addition to large areas of visibility outwith the 30 km boundary at sea, there will be land based receptors, particularly in Unst. The Figure provided does not extend far enough south to determine likely visibility out to 45 km. The assessment of cumulative effects will be a key part of the EIA and we note that the applicant refers to this being considered 'within the study area' therefore it is critical this is agreed and understood by all parties.	Noted. A proportionate assessment out to a 45 km study area has been provided within Chapter 4: Seascape, Landscape and Visual Amenity (EIAR Volume 2).
		Seascape, Landscape and Visual - Scoped Out Topics	Q4.2: Are the suggested omissions (decommissioning effects and effects on Wild Land) acceptable? We agree that decommissioning can be omitted. We request that Ronas Hill and North Roe WLA is scoped in. The nature, siting, scale or design of the current proposals are likely to result in a significant effect on the qualities of the WLA. As noted in 4.2.10 of the scoping report "The most critical LCTs/ character units within the wider Study Area are LCT 349 and 351 which, on North Roe, coincide with Ronas Hill and North Roe Wild Land Area (WLA), which is a nationally important landscape valued for its remoteness, the absence of man-made artefacts and its darkness at night." The ZTV indicates that the proposed development is visible from much of the WLA. Ronas Hill is very important locally, being the highest point on Shetland; an important destination and place for informal outdoor activity and recreation; and with important archaeological and cultural value. Its iconic location and the locally significant numbers of visitors (both tourists and locals), together with the value placed on the views from the WLA, emphasise these values. The proposed windfarm will potentially be visible by people returning from the summit of Ronas Hill to the car park on Collafirth Hill and we consider this to be a very sensitive visual receptor. These impacts should be considered as part of the LVIA. Consideration of the impacts on the Ronas Hill proposed Local Landscape Area (pLLA) should be included in the assessment. PLLAs, were approved by the Council on 10/12/2012 for consultation with the public and stakeholders as part of the draft Supplementary Guidance; that SG has not yet been adopted. The pLLA are a material consideration. Comments in relation to night-time lighting assessment are provided below.	The Proposed Development is located outwith a defined Wild Land Area (WLA), being over 10 km north west of the Site. NPF4 states that: "Buffer zones around wild land areas will not be applied, and effects of development outwith wild land areas will not be a significant consideration." Consequently, it is considered unnecessary to undertake a detailed WLIA for the Proposed Development. An assessment of Ronas Hill LLA is presented in Chapter 4: Seascape, Landscape and Visual Amenity (EIAR Volume 2).
		Seascape, Landscape and Visual - Assessment Viewpoints - General	Q4.3: Is the list of preliminary assessment viewpoints sufficient. If not, which additional or alternative viewpoint locations would consultees propose? We welcome the draft viewpoint selection, but we suggest further work is required by the applicant and additional viewpoints are required. Brief comments are provided below for some viewpoints, and we go on to suggest additional viewpoints for consideration.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
		Seascape, Landscape and Visual - Alternatives Assessment Viewpoints	VP13 Gluss Ayre – either as an alternative to VP13, or in addition to VP13, we suggest a VP from the road above the houses at Turvister, Gluss, approx. 60.485861 N, -1.365689E due to cumulative windfarm visibility. VP14 Minor road south of Sullom. Exact location may need to be within 200m further north or south from northings and eastings given in order to avoid view being obstructed by houses and trees in gardens on lower side of the road. VP16 A970 west of Brae (Mavis Grind). Additional or alternative VP should be considered at the Busta Road, Ladies Mire (approx. 60.390339 N -1.369463E). VP17 Minor road – Newhouse, Lunna Ness. We request the exact location of this VP is revised from the northings and eastings given. An improved location could be at the passing place approx. 500 m along the road to the north (approx. 60.524853, -1.096632).	VP13 Gluss Ayre - alternative location accepted. VP14 Minor Road South of Sull Voe - advice noted. VP16 A970 west of Brae - alternative location at the Busta Road, Ladies Mire accepted. VP17 Minor Road - Newhouse, Lunna Ness - alternative location accepted.
		Seascape, Landscape and Visual - Additional Assessment Viewpoints	We also request that the following additional viewpoints are considered for addition: Mossbank – viewpoint at Mossbank pier (approx. 60.462017, -1.182194) Ollaberry – layby at Hillhead, Ollaberry (approx. 60.509571, -1.34976). Layby on Lunning Road above houses at Gardin, Vidlin (approx. 60.372606, -1.117799) Whalsay – carpark at Skaw Golf Course, Whalsay (approx. 60.37919, -0.92547), or other suitable location on Whalsay. There would also be value in adding a viewpoint from the A968 (approx. grid HU443737) due to impacts of sequential windfarm visibilities. We also note that, while it is recognised in the report and appendices that the proposed development will be visible by marine users, there are no water-based viewpoints included as assessment viewpoints. The Yell Sound ferry (Uista-Toft) is a key transport route and part of the visitor experience in Shetland. Marine industry and recreation are also important within the study area. While we appreciate the technical difficulties of producing water-based assessment viewpoints, we request that appropriate water-based viewpoints are considered.	Additional viewpoints at Mossbank, Ollaberry, Vidlin, Whalsay and Yell Ferry route accepted. Additional viewpoint from the A968 not accepted due to VP20 providing an elevated view of the A968.
		Seascape, Landscape and Visual - Turbine Lighting	Although it is stated that aviation lighting will be a statutory requirement, night-time ZTV and visualisations are not mentioned within the Scoping Report. Given the highly visible coastal location of the proposal, together with the proposed scale of development, we request that a night-time lighting assessment should be provided in accordance with NatureScot guidance. The turbine lighting assessment should consider the cumulative effects of lights from other consented or application stage developments. We encourage the applicant to consider the full range of available turbine lighting mitigation options. If directional lighting is to be employed as a form of mitigation, then it would be useful to include a lighting intensity ZTV within the assessment. While we recognise the proximity of the development site to the industrialised areas at SVT and Sella Ness, it should be noted that a programme of works to mitigate light pollution has made a both measurable and visually noticeable reduction in night-time light pollution in recent years.	A night assessment in accordance with NatureScot’s current guidance has been prepared and is presented in Technical Appendix 4.8: Aviation Lighting Impact Assessment (EIAR Volume 4) . The assessment includes consideration of the lighting on cumulative developments. This is accompanied by: i) annotated wirelines indicating which of the proposed turbines would be lit, ii) night visualisations for four night viewpoints, in line with NS guidance. The selected night visualisations, where relevant, contain lighting on other consented developments.
		Ecology - Bordigarth Local Nature Conservation Site (LNCS)	6.1: Can the consultees provide any clarification on the apparent discrepancy between the description and boundary of the Bordigarth LNCS provided by SIC and NatureScot and that provided by SBRC? SIC formally adopted the LNCS Supplementary Guidance in 2015 - https://www.shetland.gov.uk/downloads/file/1954/local-nature-conservation-sites-supplementary-guidance-2015 Since that time each LNCS has been monitored at least once, this has provided further information on the status of the interest feature at each site and allowed for a review of the site boundary. Therefore, the larger LNCS boundary provided by the SBRC reflects the actual distribution of interest feature that the site was originally designated for. Although it has not been formally consulted on it should be regarded as a draft boundary. We would also highlight that the site is designated as a breeding location for a species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) and given the prominence of biodiversity in NPF4 this must be fully considered in the EIA.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
		Ecology - Survey Scope	Q6.2: Are the consultees content with the scope and nature of the ecological baseline surveys? The Natural Heritage desk study has provided baseline data in line with that expected. The Phase 1 Habitat and National Vegetation Classification survey has been undertaken using standard methodologies. The protected terrestrial mammal survey has been undertaken in relation to otters and mountain hare using survey methods advised by NatureScot. We consider that the proposed scope of surveys and assessment of the key ecological receptors identified in the Scoping Report should adequately assess the overall ecological impacts, although it will be important to ensure that the access routes to site are also included. Any deviations from published best practice or national guidance should be fully justified within the EIA Report. The location of the vantage point surveys should be agreed with NatureScot.	Noted.
		Ecology - Scoped Out Topics	Q6.3: Are the consultees content to scope out macro-invertebrate surveys other than the requirement for to pre-construction baseline survey? We consider that freshwater macro-invertebrates should be scoped in at this stage. This will ensure that the scheme design is based on a full understanding of the ecological baseline.	Aquatic macro-invertebrate surveys have not been undertaken as these are not typically influential in the consenting process and are generally used for water quality monitoring and establishing baseline conditions. Their inclusion at this stage is therefore not considered necessary for the EIA. Should consent be granted for the Proposed Development then baseline aquatic monitoring would be established following standardised methodologies. The only relevant exception is freshwater pearl mussel, a legally protected species known to occur in Shetland. Walkover surveys have confirmed that none of the watercourses within the Site boundary have the capacity to support this species. This has been addressed in Chapter 6: Ecology (EIAR Volume 2).
		Ecology - Biodiversity Enhancement	Q6.4: Are the consultees content with the scope and nature of the proposed biodiversity enhancement? We request that as part of the EIA report, the applicant follow NPF4 and relevant guidance in clearly setting out how the mitigation hierarchy is being implemented, and clearly delineate those measures that are within the mitigation hierarchy and those that are the measures to provide biodiversity enhancement. We note that the NatureScot priority peatland guidance is cited within the Scoping report and expect this to be followed during the production of the EIA. The majority of the development site is based on the Carbon and Peatland 2016 Map, expected to be Class 1 peat. We note that habitat surveys were undertaken in 2022 and that a Peatland Condition Assessment (PCA) described the habitat to be in variable condition. Of the measures outlined as biodiversity enhancement opportunities we recommend that peatland restoration is prioritised along with the creation of pools, ponds and lochans. The applicant should clarify control over land through the EIA, especially in relation to grazing, considers management, including stocking levels for the life of the development. We suggest that the opportunities for riparian planting in terms of appropriate biodiversity enhancement are limited within the development area and any planting that is proposed must follow the 'right tree in the right place' approach. Although there has been an increase in small-scale planting in recent years, Shetland is still considered to be a treeless environment, therefore landscape character impacts may need to be taken into account if planting is proposed. We would further highlight that NPF4, sets out new requirements for development to deliver positive effects, primarily under Policy 3. It states that national and major developments, or those subject to EIA, proposals will only be supported where it can be demonstrated that it will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention.	Noted. The design of the Proposed Development has followed the mitigation hierarchy and has taken into consideration the requirements of NPF4 and relevant guidance. Further detail on the evolution of the Proposed Development Design is presented in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2). Proposed biodiversity enhancement and habitat management measures are presented in Technical Appendix 6.5: Outline Biodiversity Enhancement and Habitat Management Plan (EIAR Volume 4).
		Ornithology - General	We note that the NatureScot 'Guidance Note - Assessing the significance of impacts on bird populations from onshore wind farms that do not affect protected areas' is cited. And that the SNH (2017) 'Recommended bird survey methods to inform impact assessment of onshore windfarms' is cited as the method used. The NatureScot website indicates that the latter was updated in March 2025. It should be confirmed whether the surveys undertaken in 2022-2024 still comply with currently recommended methods, and if not, any differences to recommended methodology since the time when the surveys were conducted should be detailed and potential impacts assessed. We	The ornithological surveys undertaken in 2022–2023 complied with the NatureScot guidance that was current at the time of survey. NatureScot guidance is updated frequently, and the established approach within EIA is to apply the best practice methodologies available at the point the work is undertaken. This ensures that the data collected are robust and valid for assessment purposes. Chapter 7: Ornithology (EIAR Volume 2) clearly sets out the survey methods used, alongside reference to the relevant guidance.

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			note that confidential breeding data relating to Schedule 1 species arising from the ornithological surveys conducted during 2022-2024 has been shared with NatureScot but are unable to comment as we have not seen this document. 7.2.1 states that ‘all known records of important ornithological receptors... were identified’. Although it is stated that NatureScot sitelink, SBRC and NBN Atlas were used, there is no detail either in Section 7 or in Appendix C as to which data sources or population estimates were used for each species. Data sources should be confirmed within the EIA. 7.3.2 We request that the biodiversity enhancement report clearly defines which measures are taken as part of the mitigation hierarchy and which are proposed as part of the biodiversity enhancement requirements.	Data sources have been provided in Chapter 7: Ornithology (EIAR Volume 2). With regard to biodiversity enhancement, Technical Appendix 6.5: Outline Biodiversity Enhancement and Habitat Management Plan (EIAR Volume 4) distinguishes between measures that fall under the mitigation hierarchy (e.g. avoidance, mitigation, compensation) and those which are proposed as additional biodiversity enhancement requirements.
		Ornithology - Scope of Assessment	Q7.1: Are the consultees content with the nature and the scope of the ornithological surveys? We agree that the potential effects as outlined in 7.4.1 to 7.4.4 should be scoped in. Given the level of wind farm development in Shetland we consider that the assessment of cumulative impacts will be a key part of the assessment. It is important to ensure that this assessment is based upon the most accurate Shetland population data available. The impacts of turbine lighting at night on birds and other fauna should also be considered.	Noted.
		Ornithology - Scoped Out Topics	Q7.2: Are the consultees content with how the matters identified are scoped out? We are content that decommissioning and climate change can be scoped out.	Noted.
		Hydrology, Hydrogeology, Geology and Soils	A comprehensive consultation response has been provided by SEPA and we do not have any additional comments to provide on natural heritage interests relating to hydrology, hydrogeology, geology and soils.	Noted.
		Traffic and Transport	The Shetland Islands Council Roads Service have the following comments to make. No access route to the development site has been determined yet, so it is difficult to comment on this aspect of the application. Possible points of access onto the road network include the B9076 to the south of the site or via the private road to the west of the site, both as identified in the submission. In terms of routing, my initial thoughts are that I would be happier with the access to be via/ off the private road to the west. However, I would like to reserve the right to modify that comment/ make more detailed comment on the issue of an access point once more detail is available. The ports of Sullom Voe and Lerwick are being considered for the transportation of some of the goods. For the transportation of materials by road via Lerwick, with the route being the A970, A968 and B9076, I would have no particular concern, but there may be issues along the route to address depending on the specifics of the components to delivered. For routing from Sullom Voe, the scope for any issues is much less. I also note that it is proposed to look at borrow pits and on-site batching of concrete to lessen the potential number of road trips to the site. Given this, I would therefore request that a Construction Phase Traffic Management Plan be submitted once the full details of the project are ascertained. This should identify the types and modes of transport being proposed along with the numbers of trips/ material volumes/ tonnages, with identification of any source for material(s) and disposal area(s) out with the site. An outline timetable for the construction operations should also form part of the CPTMP. Given the potential number of trips that could be generated on the public road network I would ask that you notify the developer by condition that a Road Repair Agreement and/ or Road Condition Survey may be required to be put in place for the proposed haulage routes once these, and their likely level of use, have been determined. In terms of the Abnormal Loads; if these are to be from Lerwick, rather than utilising the Construction Jetty, then a full impact assessment of the route from Lerwick to the site would be required to ensure what road furniture and other items, such as structures, may need to be addressed to accommodate the proposed loads.	Noted. As described in Chapter 2: Description of the Proposed Development (EIAR Volume 2), the Shetland Gas Plant Road is proposed as the main point of access for the Proposed Development. An abnormal loads assessment has been prepared for the Proposed Development and is presented in Technical Appendix 9.2: Abnormal Loads Assessment (EIAR Volume 4). A CTMP would be prepared and submitted to SIC for approval by the Principal Contractor prior to construction of the Proposed Development. Chapter 9: Traffic and Transport (EIAR Volume 2) provides an outline of the information to be included in the CTMP.

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		Concluding Comments	This letter is to be regarded as the Scoping Opinion that has been adopted by the planning authority and is provided under Regulation 17 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, in that it sets down the scope and level of detail of information needing in the planning authority’s opinion to be provided in the EIA Report for the development being proposed.	Noted.
Historic Environment Scotland (HES)	06/05/2025	General Scope of Assessment	Based on the information provided, there is the potential for significant adverse impacts on heritage assets within our statutory remit. We are particularly concerned about setting impacts on the following scheduled monuments: • Crooksetter Hill, chambered cairn at SE summit of (SM3576) • Crooksetter Hill, chambered cairn near NW summit of (SM3608) • The Kames, coastal defence battery 100m SE of, Calback Ness (SM10756) • Graven, chambered cairn 650m SW of (SM3524) We welcome the inclusion of our Managing Change: Setting guidance and the EIA Handbook in the list of key references (pg. 25). We recommend that any assessment methodology tools not specified in the scoping report, like matrixes, follow the examples in the handbook (if used). Paragraph 5.3.2 explains the EIA Report will distinguish between impact and effect, stating that “an impact (will be) defined as a physical change to a heritage asset or its setting, whereas an effect (will refer) to the significance of this impact.” However, these words are used interchangeably in the following text. The EIA handbook lists the principal impact types affecting the historic environment on page 182 (direct physical, indirect physical, setting and cumulative). We suggest the upcoming EIA Report use these definitions for clarity and consistency throughout the report. We also note that direct and indirect physical impacts encompass damage as well as removal. The provided figures do not show the anticipated associated infrastructure (including access tracks, foundations, a substation, and a battery storage facility). These may have impacts, and we advise that the EIA Report assess the full development. We welcome the intention to assess the cumulative impacts of the proposed development with others in the vicinity. The assessment should clearly describe the baseline conditions, and the potential impact or change combined with other existing and reasonably foreseeable developments. The combined impact may be more or less than the sum of the impacts of individual developments. The applicant’s assessment should focus on the additional impact (if any) caused by the proposed development. We understand that grid connection does not form part of the application for consent for the proposed development, and we would welcome consultation on any cabling proposals if early assessment indicates likely significant impacts within our remit. We advise assessing any physical or setting impacts on designated assets within our remit that the proposals may cause. The EIA handbook offers helpful advice on identifying assets for assessment (pg. 179). Our Setting guidance may also be helpful, as setting impacts may occur beyond defined study areas. We recommend the applicant use a bare-earth Zone of Theoretical Visibility (ZTV) to support their initial assessment. We generally advise producing wirelines where the assessment suggests impacts could occur and photomontages to illustrate the impacts where these are likely to be significant.	Noted. The following has been included in Chapter 5: Cultural Heritage (EIAR Volume 2): ▪ Viewpoints (VPs) for the four Scheduled Monuments highlighted by HES are included in the setting assessment; ▪ HES guidance in assessment methodology (including cumulative assessment) and terminology; ▪ Full proposed layout on accompanying figures; ▪ Further consultation on any potential impacts to settings following VP assessment and/or due to grid connection has been undertaken: ▪ A series of wirelines showing both the scoping and design chill layout were shared with HES on 09/07/2025 and further wirelines were provided on 13/08/2025. ▪ HES were invited to Shetland to attend a site visit, details of this are provided in the Post Scoping consultation section below.
		Scheduled Monuments - General	We are content with the approach of the proposed assessment in relation to scheduled monuments up to 10km from the proposal. However, it is unclear if the proposed assessment is sufficient for our needs overall as contradictory information has been provided in the scoping report in relation to assessment of setting impacts on assets beyond 10km (see page 27, 5.3.9 and page 28, 5.4.9 and 5.4.10). For clarity, given the height of the proposed turbines (200m), scheduled monuments beyond 10km should be selected for assessment based on a bare-earth ZTV in the first instance. At this stage, we identify the potential for significant adverse impacts on four monuments. Visualisations from and towards these assets will be required to demonstrate the full range of impact of proposals on their setting. We note that direct physical impacts on the two monuments within the proposed development site will be avoided by design. However, the scoping report also indicates peat probing will be carried out Chapter 8 (page 58, 8.3.12-13). The applicant should be aware that peat probing should not be carried out within the protected areas of the scheduled monuments. HES should be consulted in advance should any activities involving a direct physical impact on a scheduled monument is	As noted above, VPs are included for the four SMs highlighted by HES. The bare earth ZTV has been used to assess any potential setting impacts beyond the 10km Study Area. Peat-probing has avoided direct impacts on the SMs within the Site.

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			proposed as Scheduled Monument Consent (SMC) is likely to be required. Depending on the nature of the proposed activity, it may be contrary to Scheduled Monument Consents Policy meaning consent would not be granted.	
		Scheduled Monuments - Crooksetter Hill chambered cairns.	Crooksetter Hill, chambered cairn at SE summit of (SM3576) and Crooksetter Hill, chambered cairn near NW summit of (SM3608) are both located within the development area. They are positioned on the summit of Crooksetter Hill, to the east of Sullom Voe Oil Terminal, and comprise a pair of Neolithic chambered cairns; communal burial sites dating from the 4th millennium BCE. The entrance facades of the cairns face south-east and eastsouth-east. The settings of these cairns are characterised by wide open views in all directions, with a particular focus on outward views to the south-east and reciprocal views looking northwest towards the cairns. Although there is existing industrial infrastructure west of the monuments, most of this infrastructure is relatively low-lying except for flares and the met mast. Given the proposed locations of the turbines within the development area, it is likely that they would be highly visible in views towards the cairns and reciprocal views. This has the potential to have a significant adverse impact on the setting of these monuments.	VPs from these SMs are included to inform the assessment of impacts and are reported in Chapter 5: Cultural Heritage (EIAR Volume 2) . As presented in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) , consideration of setting impacts has also been included in the turbine layout to reduce impacts by design mitigation as much as possible. Further consultation with HES has been undertaken following the preparation of draft visualisations from these SMs, details of this consultation are described in the Post Scoping section below.
		Scheduled Monuments - The Kames	The Kames, coastal defence battery 100m SE of, Calback Ness (SM10756) is located west of the proposed development area. It comprises the best-preserved WW2 coastal defence battery in Shetland, with a remarkable example of contemporary graffiti cartoons. Its purpose was to protect the important deep water harbour of Sullom Voe. Its setting includes commanding open views out over the mouth of the voe, as well as inward views towards it from the sea. It is recognised that its baseline setting includes the existing oil tanks and flares behind it to its south-east when viewed from the sea. Given the location of the turbines, it is likely that they would be highly visible in key views associated with the setting of the battery, and as such they would give rise to a change to the baseline setting of the monument potentially with significant adverse impacts.	It was noted when this SM was visited that key views are out to sea to the north and northwest away from the Proposed Development, and that whilst key views looking towards the SM from the sea would include the Proposed Development, these would also include the extensive modern structures of the Sullom Voe oil and gas terminal. A VP looking towards this SM from the opposite side of the voe is included for the assessment of impacts. Further consultation with HES has been undertaken following receipt of VPs.
		Scheduled Monuments - Graven chambered cairn	Graven, chambered cairn 650m SW of (SM3524) is located to the south of Sullom Voe Oil Terminal on the shoulder of the Hill of Graven and comprises a Neolithic burial cairn. Its setting is characterised by wide open views looking north-west over Sullom Voe as well as eastwards towards Mossbank. Although there is existing industrial infrastructure between the cairn and the development site, most of this infrastructure is comparatively low-lying except for flares and the met mast. Given the location of the proposed turbines, it is likely that they would be visible in outward views from the cairn, and this has the potential to have a significant adverse impact on the setting of the monument.	A VP from this SM is included to inform the assessment of impacts and is reported in Chapter 5: Cultural Heritage (EIAR Volume 2) . As presented in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) , consideration of setting impacts has also been included in the turbine layout to reduce impacts by design mitigation as much as possible. Further consultation with HES has been undertaken following the preparation of draft visualisations from these SMs, details of this consultation are described in the Post Scoping section below.
		Category A-listed buildings and Garden and Designed Landscapes	As above, we recommend the applicant use a bare-earth Zone of Theoretical Visibility (ZTV) to identify Category A-listed buildings and Garden and Designed Landscapes for assessment. We advise including the following shown on the supplied ZTV: - West Sandwick, North Haa (West Sandwick House) (LB18648) - Lunna House (GDL00271)	All GDLs and Category A Listed Buildings that fall within the bare earth ZTV were visited during the setting assessment site visits and has been included in the setting assessment presented in Chapter 5: Cultural Heritage (EIAR Volume 2) .
NatureScot	07/05/2025	Key Issues	The key issues to address within the Environmental Impact Assessment (EIA) include: - The impacts upon Special Area of Conservation and Special Protection Area, as outlined more fully below. - Shetland National Scenic Area (NSA) - Protected species	Noted.
		General Scope of Assessment	We note from the Scoping report that much survey work has already been completed. However, this proposal has just been received at Scoping, where the environmental issues, potential impacts and survey methodologies are only now just being shared and discussed with interested parties. Nevertheless, we welcome the opportunity to provide Scoping comments on this proposal, where we focus our advice/efforts mainly on Protected Areas, as outlined below.	Noted.
		Protected Areas - European Sites - Yell Sound Coast Special Area of Conservation (SAC)	We note the boundary of this development overlaps with the boundary of this Protected Area. In addition, turbines 1 & 2 are proposed to be constructed either within or on the cusp of this Protected Area boundary. We recommend that these turbines avoid the Protected Area boundary. A buffer from the Protected Area boundary could help to reduce impacts to otter using the terrestrial part of this SAC (e.g. otter breeding/resting. Other ecological function, such as freshwater bathing sites, use of major spraint points, etc).Therefore, we recommend a precautionary approach, just in case tall overbearing turbine son the coastal edge can give way to displacement/avoidance effects to otters within this coastal SAC, just by virtue of turbine presence, with or without associated noise effects. We welcome further contact by the developer to discuss the potential for a separation buffer distance from the SAC for turbine 1 & 2, as a precaution to avoid adverse impacts to SAC otter Conservation Objectives.	Noted. The Design Freeze layout has avoided placing infrastructure within the adjacent designated sites. The otter use/occupancy in the costal edge of the Site was checked in June 2025, this is reported in Chapter 6: Ecology (EIAR Volume 2) .

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			Any new fencing options linked to this proposal, especially in relation to the post construction / operational phase should be included in context to this Protected Area and assessed through shadow HRA for SAC otters. In addition, any changes to freshwater outflows going through the SAC & nearby (e.g. Aywick Burn), will require careful consideration due to otters requiring freshwater bathing sites. Although otters can breed at any time of the year in the UK, animals in Shetland have been noted to have a focused birth peak, occurring mainly in June. This distinct breeding season has potential to inform embedded mitigation and/or avoidance periods during construction, subject to results from pre-construction surveys. We note that an otter holt has been found on the west coastal edge of this proposal. Even if this otter holt is outwith this Protected Area it is close enough to warrant connectivity, and we therefore welcome that it has been considered an SAC related otter holt. Natal holts can be some distance from the coast, with peatland often being used in Shetland. Therefore, we recommend that survey work should involve the whole development boundary (including 200m buffer) for otter presence, which should also involve future mitigation and enhancement areas. Surveys were undertaken in 2023 and 2024 (spring and summer) and unusually have been fully presented as part of Scoping. Standing advice for otter was updated in August 2024, see: https://www.nature.scot/doc/standing-adviceplanning-consultations-otters. Impacts from this proposal should be assessed against the site Conservation Objectives (COs) within a shadow Habitats Regulation Appraisal (HRA). These COs can be found within the Conservation & Management Advice package for this SAC, which also provides more detail on this Protected Area, https://www.nature.scot/sites/default/files/special-areaconservation/8409/conservation-and-management-advice.pdf Pollution prevention during construction will also be important for both SAC species, see our comments on this below (for Sullom Voe), which relate to all Protected Areas in vicinity of the proposal.	
		Protected Areas - European Sites - Sullom Voe SAC	This SAC lies directly adjacent to the development, encompassing mainly marine nearshore habitats. The main way this Protected Area could be affected in indirectly through pollution/siltation related effects mainly linked to construction. Therefore, we recommend Pollution Prevention measures are fully included at application stage to show how this SAC site and its coastal features will remain safeguarded. For best Practice construction measures to avoid pollution will be important in shaping shadow HRA's for inclusion within the EIA Report, see: https://www.nature.scot/professional-advice/planning-and-development/planning-anddevelopment-advice/renewable-energy/onshore-wind-energy/wind-farm-constructiongood. The BESS element of this proposal introduces potential fire hazard risk, which is helpfully outlined within 14.6 of the Scoping Report. Although we are likely to issue guidance on BESS soon, we still recommend that the National Fire Chief Council (NFCC) BESS Guidance leads the way to help reduce environmental pollution risk, such as including containment tanks for water cooling in the event of a thermal event; see: https://nfcc.org.uk/consultation/draft-grid-scale-energy-storage-system-planningguidance/. More information on this SAC, complete with updated Conservation Objectives can be found within the Conservation & Management Document: https://apps.snh.gov.uk/sitelink-api/v1/sites/8363/documents/66.	Noted. Pollution prevention measures have been outlined in Technical Appendix 2.1: OCEMP (EIAR Volume 4) .

Consultee Name	Date	Topic	Consultee Response	Response
		Protected Areas - European Sites - East Mainland Coast Special Protection Area (SPA)	This SPA lies only c. 1.8km to the southeast of the development site, and is a marine SPA protected for its non-breeding waterbirds. For more information on this SPA and its Conservation see: https://www.nature.scot/sites/default/files/special-protectionarea/10482/conservation-and-management-advice.pdf. It's possible that some of these marine waterbirds may overfly the development site should they take a 'short-cut' over the promontory to access fresh foraging waters/bays nearby or to a general roosting area just offshore. It is also possible that Slavonian grebe may use some of the larger lochans within the development during winter hard weather. We note that red-throated diver has already been recorded over the site during the breeding season (7.2.4), during two years of bird survey work to date. However, Section 7.2.5 might suggest that non-breeding survey work has not been undertaken as yet. The close proximity of this marine SPA coupled with the coastal nature of this development, makes non-breeding Vantage Point survey work (Sept-April) all the more important, especially putting effort into determining any flight-line directions, helping to determine if birds from this SPA (or likely to be from this SPA) are overflying the development site and/or occasionally using lochans within the development site. Vantage point bird survey work should follow Best Practice methods, see: https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impactassessment-onshore-windfarms. However, it would seem this coastal wind farm site has potential to introduce novel issues, in the consideration of a nearby marine SPA, therefore we would welcome further dialogue from the applicant/Alba Ecology to agree a survey methodology covering a two-year survey period to help show level of effects (or no effects) within the EIA Report. It may be that bespoke survey methods are called for, especially to take into consideration diver moult periods.	Vantage Point bird surveys were undertaken over a two year period, following best practice methods. These surveys did not record any Slavonian grebe. Within the study area, the four lochs that could theoretically be of interest are Loch of Mioness, Neshion Water, Sand Water and Loch of Bordigarth. However, there is little evidence to suggest that Slavonian grebes visit these sites. If Slavonian grebes did visit these lochs then they would likely (as per divers) fly from the nearest areas of sea, as such no turbines would be on a likely flight path. Non-breeding Slavonian grebe surveys were not undertaken as these are not part of standard survey requirements.
		Protected Areas - European Sites - Otterswick and Graveland SPA	This SPA lies within connectivity (8km core distance) of this development, even though it is some 6.8km distant. Vantage Point survey work over a two-year period will be required, covering the main breeding season periods, see above link for Best Practice Bird Survey Guidelines. As above, determining any flight line patterns may help to gauge whether it's possible for divers from this SPA to regularly overfly the development site during the breeding season period. Please get in touch should you like us to comment on any proposed bird survey schedule to agree an approach which can adequately cover the likelihood of SPA birds overflying the development site.	Noted. In line with the Best Practice Bird Survey Guidelines, two full years of vantage point (VP) survey effort has been undertaken. In addition, targeted breeding diver focal watch surveys were undertaken at key breeding lochans over extended observation periods to record incoming and outgoing flightlines. Further detail is presented in Chapter 7: Ornithology (EIAR Volume 2).
		Protected Areas - European Sites - Ronas Hill - North Roe & Tingon SPA	This SPA lies approximately 8.5km away from this development. Thus, it lies outwith SPA core connectivity distance for red-throated diver. As yet, there are no terrestrial connectivity distances for great skua. Therefore, should these skuas regularly transit over the development site, connectivity to this SPA may be warranted. Flight line patterns over the development site may help to point towards some level of source location, should regular flights occur.	Based on site observations to date, no bird species have been recorded regularly transiting through the Sullom Voe flares and across the turbine area. On this basis, regular movements from the far west—and consequent connectivity to this SPA—appear unlikely. Further detail is presented in Chapter 7: Ornithology (EIAR Volume 2).
		Protected Areas - National Interest - Shetland National Scenic Area (NSA) and Ronas Hill & North Roe Wild Land Area (WLA)	Advice on the scope of our landscape advice Our approach to advising on wind farm applications is to generally focus upon impacts on Scotland's landscapes that could potentially raise issues of national interest. In this case, our landscape and visual advice is solely in relation to effects on the Special Landscape Qualities (SLQs) of the Shetland National Scenic Area (NSA) and the Ronas Hill & North Roe Wild Land Area (WLA). An assessment of effects on qualities is carried out where a proposal is likely to result in significant adverse effects on one or more SLQs within an NSA. A SLQ assessment is likely to draw on baseline information that forms part of a landscape character assessment, LVIA or Wild Land Area (WLA) descriptions but it should not duplicate information within any of these. This is because it specifically concerns the SLQs of an NSA not the wider range of landscape and visual sensitivities that may be affected by a proposal. Identifying the key SLQs susceptible to the proposal should be informed by site assessment. The scope of this assessment including which SLQs should be considered, should be agreed with the decision maker (Shetland Islands Council in this instance) and/or NatureScot in accordance with our guidance below: https://www.nature.scot/doc/assessing-impacts-wild-land-areas-technical-guidance https://www.nature.scot/doc/special-landscape-qualities-guidance-assessing-effects	An assessment of the effects of the Proposed Development on the SLQs and integrity of landscape designations, including Shetland NSAs has been undertaken as part of Chapter 4: Seascape, Landscape and Visual Amenity (EIAR Volume 2). These assessments follow NS guidance and the provisions of Policy 4 of NPF4.

Consultee Name	Date	Topic	Consultee Response	Response
		Baseline Consented Development	Existing consented onshore wind development includes: • Viking Wind Farm • Beaw Field Wind Farm • Energy Isles North Yell Wind Farm • Mossy Hill Wind Farm	Noted.
		Shetland NSA	The Shetland NSA is subdivided into 7 geographically separate areas, but are all defined primarily due to special qualities (SQs) of their varied and unique coastal character. The NSA areas share several special qualities both in terms of how the underpinning key characteristics are combined and experienced within the designated areas, but also in terms of how people travel to the areas, which reinforces several of the SQs including, remoteness and hidden coasts. Special Qualities (SQs) potentially significantly affected by the proposal are in italics below: • The stunning variety of the extensive coastline • Coastal views both close and distant • Coastal settlement and fertility within a large hinterland of unsettled moorland and coast • The hidden coasts • The effects and co-existence of wind and shelter • A sense of remoteness, solitude and tranquillity • The notable and memorable coastal stacks, promontories and cliffs • The distinctive cultural landmarks • Northern lights	On 26/02/2026, a letter was sent to NatureScot to provide details on the scope of the NSA assessment for the Proposed Development, which set out the geographic areas and SQs to be included in the assessment. On 12th March 2026 NatureScot provided a response which is detailed in the Post Scoping section below. An assessment of the effects of the Proposed Development on the SLQs and integrity of the NSA is presented in Chapter 4: Seascape, Landscape and Visual Amenity (EIAR Volume 2). These assessments follow NS guidance and the provisions of Policy 4 of NPF4.
		Viewpoint/Assessment Point Location	We would advise that an LVIA and cumulative assessment retains a search area of 45km for cumulative assessment to ensure an appropriate scale of wider assessment is detailed. When considering which proposals to include within the cumulative assessment we consider that The Shetland Council are best placed to advise on this matter.	Noted. A proportionate assessment out to a 45 km study area has been provided within Chapter 4: Seascape, Landscape and Visual Amenity (EIAR Volume 2) .
		Night time Lighting Effects	Lighting has potential to affect both landscape character and visual receptors. The site and its surroundings are situated in a remote area of relative low baseline lighting levels with some of the landscape character, NSA and WLA qualities particularly susceptible to lighting impacts. A night-time visual assessment should be undertaken in accordance with the recently published Guidance on Aviation Impact Assessment (https://www.nature.scot/doc/guidance-aviation-lighting-impact-assessment) noting that previous guidance versions have now been superseded. The scope of this assessment should again be agreed with NatureScot during the pre-application stage. Due to the layout, scale, and requirement for aviation lighting there is potential for extensive significant effects on the character and strong sense of remoteness and naturalness both during the day and at night	A night assessment in accordance with NatureScot's current guidance has been prepared. Night visualisations are provided for following viewpoints: ▪ VP 4 – Ulsta Shetland Ferry Terminal, Yell ▪ VP9 – Vantage Point by Houb of Scatsta ▪ VP22 – Ollaberry ▪ VP25 - Toft
		Yell Sounds Coast Site of Special Scientific Interest (SSSI)	Our advice is the same as that presented above for the otter feature of Yell Sound Coast SAC.	See above response in relation to Yell Sound Coast SAC.
		Otterswick SSSI	Our advice is the same as that presented above for Otterswick & Graveland SPA.	See above response in relation to Otterswick & Graveland SPA.

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		Peatland	As the development site supports such a high proportion of bog habitats (M17/M19), it increases the potential that we may object to this proposal (subject to appropriate quality and condition assessments, see below). We note that most of the study area (61%) has been mapped as blanket bog habitat, with a lesser extent identified as modified bog (table 3, Scoping Habitat Survey Report). Yet, table 4 shows a much higher proportion of the site as modified bog based on the Peatland Action Condition Guidance. For developments, it will be important that habitat condition & quality should be assessed by following our Best Practice Guidance (https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management) and not the Peatland Action Guidance. Completion of site visit templates, found within the Annex of our Best Practice Guidance (link above), should be included within the EIAR. Should the development area, including a buffer of 250m, meet the peatland national interest criteria in the template, an additional map should be provided showing these locations overlain by development infrastructure and/or areas that may be directly or indirectly affected. Habitat survey has identified potential loss of some surface water pools (6.3.9). As a precaution, we highlight that some peatland habitats are particularly sensitive to impacts from development, such as M1-M3 surface bog pools which should be completely avoided (see our peatland guidance, as above). We note comments within the Scoping Report of peatland restoration compensation areas already having been identified and that will be addressed within the Outline Biodiversity Enhancement and Habitat Management Plan (OBEHMP). Section 6.3.9. identifies peatland restoration as biodiversity enhancement. See our comments below about the importance of splitting any peatland compensation/mitigation from additional nature enhancement measures (which may also include peatland enhancement, if this can be achieved over and above the recommended Best Practice 1:10 compensation ratio).	During the habitat surveys, much of the Site was mapped as blanket bog, largely M17b with some areas of M19a. The condition of the bog was variable, and used the Peatland Condition Assessment (PCA) to demonstrate this (NatureScot Peatland Action Methods). NatureScot guidance indicated that there is a potential for objection if a project impacts upon habitats such as M17, M18 and M19 which are considered priority peatlands. It is important to note that not all M17 is of the highest quality, and NatureScot guidance also notes that the condition should be assessed. A PCA was conducted for the Site which is a valid technique for considering the peatland condition. The NS guidance goes on to state: "According to NS (2023) priority peatland communities that should be completely avoided are M1, M2 M3 bog pools occupy waterlogged depressions, shallow pools and erosion channels on bogs. Priority peatland communities where impacts have the potential to raise issues of national interest are M17, M18 and M19. Priority peatland communities that are unlikely to raise issues of national interest include the modified communities on deep peat M15, M20 and M25. NS state that impacts on these communities are unlikely to raise issues of national interest but should still follow the mitigation hierarchy. They could also be important candidates, as well other peatland communities, for measures to offset impacts from development and areas where enhancement measures could be located." NatureScot state that "if, following specialist advice, it is confirmed that the habitat is priority peatland which is actively forming peat with indicator species and features of near natural condition, and taking into account the impacts and the mitigation hierarchy, that there are likely to be adverse impacts on that habitat, then our conclusion is likely to be that the proposal raises issues of national interest. There may also be some cases where not all criteria in the Template are met, but due, for example to the magnitude of the effects, we may conclude that the proposal raises issues of national interest". The design of the Proposed Development has sought to avoid areas of Near-Natural bog including areas with groupings of bog pools (but note T2 is in an area with pools, and isolated pools are harder to avoid). We have also demonstrated careful avoidance areas which could be restored to active peat bog. Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) describes the design changes that were taken to avoid the best areas of blanket bog. This demonstrates the first important step of the mitigation hierarchy. Peatland habitat will be impacted by the Proposed Development, including some areas that would be considered potentially priority peatland. However, most of these areas are unlikely to be "<i>actively forming peat with indicator species and features of near natural condition</i>". The surveys which have been undertaken in 2025 (the vegetation surveys of the design) directly consider and link to the NatureScot guidance including consideration of the SSSI selection criteria, consideration of potential for National Interest and the use of the 'NS template'. We agree that this project should be aiming for a minimum of 1:10 x compensation for the losses, plus additional peatland restoration as enhancement. Details on this are provided in Technical Appendix 6.5: Outline Biodiversity Enhancement and Habitat Management Plan (EIAR Volume 4).
		Biodiversity Enhancement & Management Plan	We recommend the applicant splits Biodiversity Enhancement (as a duty to comply with NPF4) into a separate document/section from any Habitat Management to help mitigate impacts from the development. This would allow for a clearer understanding of how the development will make positive contributions for Nature over and above mitigation, such as 1:10 peatland restoration to help make good impacts from the proposal.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
		Protected Species - Wider countryside birds	Whimbrel and Arctic skua should be scoped-in as red-listed UK breeding species. Cumulative impacts with other developments within the same Natural Heritage Zone (NHZ) should be taken into consideration when presenting potential impacts to the NHZ population, including recent assessments on populations from bird flu. The Scoping Report appears to lack detail of which wider countryside species will be scoped in for more detailed assessment. We note the Scoping Report (2.3.4) has recognised bird constraints in the south of the site which has already informed early layout changes. However, the details of these have not yet been provided.	Both species have been scoped into assessment and have been thoroughly considered and assessed. Details on the design evolution are detailed in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) .
		Protected Species - Wider countryside mammals	Mountain hare: Alba Ecology acknowledge NatureScot standard advice to help protect this species and highlight the recommendation that species licencing may be required (should this proposal be approved). Bats: Although bats are not normally resident in Shetland, clearly some migratory species are occasionally recorded, especially during October, these are often trapped in buildings or grounded/moribund individuals (Harvey, 2014i). Therefore, bat presence through Shetland may be under-recorded. See our comments to Q.6.1 within Annex A. See our standard Best Practice Guidance on bats and bat surveys, https://www.nature.scot/doc/standing-adviceplanning-consultations-bats .	Noted. During NatureScot site visit (dated 20/08/2025) the contradiction of mountain hares being protected and also a non-native species to Shetland was discussed with NatureScot. NatureScot advised that they would return an answer to the Applicant on this matter. No response has been received. Bat surveys were not undertaken given the absence of a bat population in Shetland and no evidence of migratory use. Records indicate that bats only occur as vagrants and therefore their populations, if considered, would be assessed against the European population metrics (tens to hundreds of millions dependent on which species considered). The rationale for not undertaking bat surveys is presented in the Chapter 6: Ecology (EIAR Volume 2) .
		Concluding Comments	Please refer to our updated Pre-Application Guidance, which includes many helpful wind farm related issues, guidance and advice, see; https://www.nature.scot/doc/naturescotpre-application-guidance-onshore-wind-farms . Please let me know if you need clarification on the above or any further information following our advice	Noted.
		Follow up to questions within Scoping Report	Ecology (Section 6) 6.1 – It’s not totally clear within the Scoping Report what non-avian Protected Areas / ecological features are proposed to be scoped in. For example, this section tends to just indicate the potential construction and operational impacts to be considered, as listed in Table 6.1 & 6.2. For example, are the developers proposing to scope-in bat survey work? For the avoidance of doubt, non-avian Protected Areas featuring within this response should be scoped in. Please see our comments, as above, regarding assessing quality and condition of peatland habitats based on NatureScot Best Practice Guidance specifically for development proposals. 6.2 – We defer to Shetland Islands Council to advise on the suitability of any biodiversity enhancements. However, we will comment where proposals might affect Protected Areas, either positively or negatively. See our comments above about providing clarity between mitigation (required to offset impacts of the development) and enhancement (improving nature, over and above impacts from the development). Ornithology (Section 7) 7.1 – See our comments above about potential impacts of the development on Protected Area features. Further survey work is likely to be required for a non-breeding Protected Area which lies in proximity to the proposal, where SPA birds may overfly and use lochans within the development site. 7.2 – As 6.1 above, it’s not clear what Protected Areas or red-listed species will be scoped in our out. For example, will whimbrel and Arctic skua (wider countryside species) be scoped in? If so, we recommend that cumulative impacts on these NHZ range/populations should be included, for example. For the avoidance of doubt, Protected Areas featuring within this response should be scoped in. Hydrology, geology & soils (Section 8) 8.1 – See our comments above about methods used to assess condition & quality of blanket bog habitats. We recommend that Best Practice methods are used which are linked to development proposals.	Noted. Please refer to earlier responses.

Consultee Name	Date	Topic	Consultee Response	Response
SEPA	08/04/2025	General Comments	Our position and advice, given below, is based on the determining authority ultimately determining that the proposal is classed as development that could be supported for the purposes of assessment under policies 5 and 22, as defined in National Planning Framework 4. If this is not the case, please advise so we can re-consider our position and advice. Advice for the planning authority / determining authority To avoid delay and potential objection the EIA submission must contain a series of scale drawings of sensitivities, for example peat depth, peat condition, groundwater dependent terrestrial ecosystems (GWDTE), proximity to watercourses, overlain with proposed development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, then reduce and then mitigate significant impacts on the environment. We request that the issues covered in Appendix 1 below, be addressed to our satisfaction in the EIA process. This provides details on our information requirements and the form in which they must be submitted. We have also provided site specific pre-application comments in the following section, which can help the developer focus the scope of the assessment.	Noted. A suite of drawings has been prepared to accompany the EIAR and are presented in EIAR Volume 3a. A description of the design evolution is provided in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2), which describes the constraints taken into consideration during the design process, including the siting of turbines and infrastructure following completion of a GWDTE risk assessment, stage 1 and stage 2 peat probing and to allow minimisation of watercourse crossings.
		Site Specific Comments	We note that some survey work relevant to our interests has already been undertaken (eg habitat surveys) and that further work is proposed (eg peat probing, GWDTE), which is welcome. We would be happy to provide the applicant with pre-application advice once the peat probing and GWDTE assessment has been completed following the advice provided in Appendix 1. The results should be used to inform the layout so that GWDTE, areas of deeper peat, natural and near natural condition peat are avoided as much as possible. In this case, where much of the site is on peat, we expect the application to be supported by a comprehensive site specific peat management plan. Provided watercourse crossings are designed to accommodate the 1 in 200 year event plus climate change and other infrastructure is located well away from watercourses (ie outwith the minimum 50m buffer) we do not foresee from current information a need for detailed information on flood risk. It is important that the construction working corridor is also outwith the watercourse buffer areas, where possible, to reduce the risk of adverse effects on the water environment. It should also avoid other sensitive receptors such as deeper peat, natural and near natural condition peat and GWDTE. It would be helpful for the EIA Report to provide clarification on the construction working corridor. We note that 100m micrositing allowance is proposed. The Schedule of Mitigation of the EIA Report should include a commitment that any micrositing would not encroach into buffers for GWDTE, private water supplies or watercourses, or result in a greater overall effect on peat than the original location. Regulatory advice for the applicant Details of regulatory requirements and good practice advice, for example in relation to engineering works in the water environment and waste management, can be found on the regulations section of our website.	Noted. Peat probing and a site walkover for GWDTE and hydrology has been carried out. A GWDTE assessment informed by peat surveys, site walkover observations, and hydrological GIS tools has been undertaken and has identified no GWDTE within the Site. This assessment is presented in Technical Appendix 8.2: Groundwater Depended Terrestrial Ecosystems (GWDTE) Assessment (EIAR Volume 2). As described in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2), the Proposed Development layout has been created with consideration of watercourse buffers to minimise hydrological disruption.
		Detailed Scoping Requirements - General	Please note that some of the planning guidance referenced in this response is being reviewed and updated to reflect the National Planning Framework 4 (NPF4) policies. It still provides useful and relevant information, but some parts may be updated further in the future. This appendix sets out our minimum information requirements and we would welcome discussion around these prior to formal submission to avoid delays. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site. If there is a significant length of time between scoping and application submission, the developer should check whether our advice and guidance has changed.	Noted.
		Detailed Scoping Requirements - Site Layout	Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. All drawings must be based on an adequate scale with which to assess the information. To show sufficient detail of smaller areas of the site for peat depth, watercourses and GWDTE in particular, this may mean that, as well as an overall whole site figure, multiple figures are required splitting	Noted. A suite of drawings has been prepared to accompany the EIAR and are presented in EIAR Volume 3a.

Consultee Name	Date	Topic	Consultee Response	Response
			the site into sections using larger scale maps. Such figures should show greater detail of where different elements of the proposed development are located in relation to those interests, to demonstrate how adverse effects have been minimised through the siting and design process. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible. A comparison of the environmental effects of alternative locations of infrastructure elements may be required.	
		Detailed Scoping Requirements - Water Environment	The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors. The submission must include a set of drawings showing: a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses; b) A minimum buffer of 50m around each loch and watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works; c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all lochs and watercourses within 250m and showing a sitespecific buffer around each loch or watercourse proportionate to the depth of excavations. The information provided needs to demonstrate that a site specific proportionate buffer can be achieved. Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide.	A description of the design evolution has been provided in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2), which notes the constraints taken into consideration during the design process, including the siting of turbines and infrastructure following completion of a GWDTE risk assessment and to allow minimisation of watercourse crossings. A suite of drawings has been prepared to accompany the EIAR and are presented in EIAR Volume 3a.
		Detailed Scoping Requirements - Flood Risk	Advice on flood risk is available at Flood Risk Standing Advice and reference should also be made to Controlled Activities Regulations (CAR) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities. Crossings must be designed to accommodate the 0.5% annual exceedance probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures. If it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. Our Technical Flood Risk Guidance for Stakeholders outlines the information we require to be submitted in an FRA.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
		Detailed Scoping Requirements - Peat and Peatland	Where proposals are on peatland or carbon rich soils (CRS), the following should be submitted to address SEPA’s requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage). Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not. It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice. The submission should include a series of layout drawings at a usable scale showing all permanent and temporary infrastructure, with extent of excavation required. These plans should be overlaid on the following: a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy in NPF4, which may be more than that outlined in the Peatland Survey – Guidance on Developments on Peatland (2017); b) Peat depth survey showing interpolated peat depths 1.2 Peatland condition mapping – the Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category. The detailed series of layout drawings above should clearly demonstrate that development proposals avoid any near natural peatland and that all proposed excavation is on peat less than 1m deep. The layout drawings should also demonstrate that peat excavation has been avoided on sites where this is possible. On other sites where complete avoidance of peat and carbon rich soils is not possible then it should be clearly demonstrated that the deepest areas of peat have been avoided and the volumes of peat excavated have been reduced as much as possible, first through layout and then by design making use of techniques such as floating tracks.	A description of the design evolution has been provided in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) , which details the constraints taken into consideration during the design process, including the siting of turbines and infrastructure following completion of stage 1 and stage 2 peat surveys and to minimise the volume of peat excavation.
		Detailed Scoping Requirements - Peat and Peatland	The Outline Peat Management Plan (PMP) must include: a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes; b) A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including borrow pits (quantities used in making good areas disturbed by development must be the minimum required to achieve the intended environmental benefit and materials must be suitable for the proposed use), (2) used in on and off site peatland restoration, and (3) disposed of, and the proposed means of disposal (if deemed unavoidable after all other uses of excavated peat have been explored and reviewed); c) Details of proposals for temporary storage and handling of peat - Good Practice during Wind Farm Construction outlines the approach to good practice when addressing issues of peat management on site and minimising carbon loss; d) Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation, including evidence on the suitability of the peat and evidence that the quantity used matches and does not exceed the requirement of the proposed use. If peat is to be used in borrow pits on site, SEPA will require sections and plans including the phasing, profiles, depths and types of material to be used; e) Use of excavated peat in areas not disturbed by the development itself is now not a matter SEPA provides planning advice on. Please refer to Advising on peatland, carbon-rich soils and priority peatland habitats in development management NatureScot 2023, and the Peatland ACTION – Technical Compendium which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that SEPA can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to accommodate any regulatory requirements. Further guidance on this may be found in the document 'Is it waste - Understanding the definition of waste'.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
		Detailed Scoping Requirements - GWDTE and existing groundwater abstractions	GWDTE are protected under the Water Framework Directive. Excavations and other construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas. A National Vegetation Classification (NVC) survey should be submitted which includes the following information: a) A set of drawings demonstrating all GWDTE and existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. The survey needs to extend beyond the site boundary where the distances require it. b) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. Please refer to Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems and Guidance on Assessing the Impacts of Development on Groundwater Abstractions for further advice and the minimum information we require to be submitted. Please note that due to discrepancies in habitat definition and ambiguity in correspondence with NVC types we do not accept the use of The UK Habitat Classification System (UKHab) as an alternative to NVC.	A description of the design evolution has been provided in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2), which notes the constraints taken into consideration during the design process. A GWDTE assessment informed by peat surveys, site walkover observations, and hydrological GIS tools has been undertaken and has identified no GWDTE within the Site. This assessment is presented in Technical Appendix 8.2: GWDTE Assessment (EIAR Volume 4).
		Detailed Scoping Requirements - Pollution prevention and environmental management	The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements. Please refer to the Guidance for Pollution Prevention (GPPs) and our water run-off from construction sites webpage for more information.	Noted. Mitigation measures identified within each technical chapter of the EIAR has been summarised in Chapter 14: Schedule of Mitigation (EIAR Volume 2) .
		Detailed Scoping Requirements - Life extension, repowering and decommissioning	Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with SEPA guidance on the life extension and decommissioning of onshore wind farms. Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed. The discarding of materials as waste should be avoided. However, if there is an intention to discard materials then further guidance on this may be found in the document Is it waste - 'Understanding the definition of waste'.	Noted.
Internal Scottish Government Advisors				
Transport Scotland	16/04/2025	Traffic and Transport	Paragraph 1.3.1 of the Scoping Report confirms that the applicant is “developing proposals to construct and operate an Energy Park including up to 10 wind turbine generators (WTGs) with a maximum tip height of 200 m, a Battery Energy Storage System (BESS) and ancillary works”, and is proposed to be “located on land located east of Sullom Voe Oil Terminal and the Shetland Gas Plant in Shetland, Scotland.” OBSERVATION 1: There are no trunk roads on Shetland.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
		Traffic and Transport	Baseline Conditions The Scoping Report confirms in paragraph 10.2.2. that “It is expected that a good proportion of construction materials and deliveries will come via Lerwick and its associated harbour, then via the A970, A968 and B9076 to the Site.” Assessment Scope and Methodology Key Terms of Reference It is accepted that the rules extracted from IEMA Guidelines will be used as a screening process to define the scale and extent of the assessment of potential environmental effects, with sensitivity and magnitude criteria applied to determine the significance of effects. The potential environmental effects to be assessed, and listed in the Scoping Report, are also accepted, i.e.: •Severance of communities •Road vehicle driver and passenger delay •Non-motorised user delay and amenity •Fear and intimidation on and by road users •Road user and pedestrian safety •Hazardous / large loads The Scoping Report confirms that the proposed study area for the assessment of traffic and associated environmental effects will include the following road links and associated corridors: •A970 •A968 •B9076 OBSERVATION 2: It is noted that the study area does not extend beyond Shetland and, therefore, does not consider any of the trunk road network. OBSERVATION 3: Transport Scotland are primarily concerned with trunk road network impacts. The suitability of information informing the assessment of effects on the local road network is regarded as a matter for consideration by the Planning Authority.	Noted.
		Traffic and Transport - Additional Observations - Abnormal Loads Assessment	Should it be necessary to extend the study area to include the trunk road network, e.g., materials being transported along the trunk road network on mainland Scotland, the following should be considered. OBSERVATION 4: The following aspects should be confirmed in the supporting Abnormal Loads Assessment (ALA): -The number and dimensions of abnormal loads and transporting vehicle, i.e., weight limits, length etc. -All trunk roads to be used by abnormal load vehicles. -A route review should be undertaken considering the horizontal and vertical alignment of the preferred route(s), defining locations where a detailed swept path assessment is required. -Swept paths analysis are required for turbine blades and turbine tower sections, and associated drawings must be provided. -Key organisations to be consulted along the proposed routes should be identified. -Initial consideration of: The maximum axle loading on structures in consultation with the relevant roads agencies; clear heights in consultation with utility providers and transport agencies; roadworks or closures that could affect the passage of the loads; underground services on the proposed route; satisfaction of Police Scotland and local authority to the proposed route(s); lay-by areas that can be utilised for temporary parking; and lay-bys that can be used to let traffic pass slow moving abnormal loads. -Any other obstructions that may restrict transportation of abnormal loads. -Details of measures to mitigate the impacts of abnormal load movements. -Drawings providing details of proposed mitigation measures. -Geometry and visibility at access point(s) to / from trunk road. -Abnormal Loads Management Plan introducing measures that could help reduce the impact of abnormal load convoys.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
			OBSERVATION 5: The ALA must consider the full extent of the proposed abnormal loads route impacting the trunk road network.	
		Traffic and Transport - Additional Observations - Baseline Data	OBSERVATION 6: Any existing trunk road traffic data that may inform the traffic and transport assessment shall be requested via traffic.data@mobiie.co.uk. Transport Scotland would highlight that Department for Transport (DfT) traffic count data is not an appropriate source of information for the assessment of trunk road traffic impacts. As stated in the DfT website data disclaimer, "traffic estimates for individual road links and small areas are less robust, as they are not always based on up-to-date counts made at these locations. Where other more up-to-date sources of traffic data are available (e.g. from local highways authorities), this may provide a more accurate estimate of traffic at these locations. It is the responsibility of the user to decide which data are most appropriate for their purpose, and if DfT road link level traffic estimates are used, to make a note of the limitations in any published material". OBSERVATION 7: The baseline traffic data utilised must be representative of typical conditions. OBSERVATION 8: Trunk road accident data shall be obtained from Transport Scotland via accidentdatarequests@transport.gov.scot. The extents of the accident assessment study area must be clearly defined, with the end points of assessed road links specified, i.e., the locations beyond which no assessment has been undertaken. A plan should be provided to illustrate these extents, the locations of the accidents identified, and the severity of identified accidents. The assessment should identify whether any accident clusters are present within the study area and whether development traffic is likely to cause or exacerbate any road safety issues. Details of any proposed mitigation measures should also be provided.	Noted.
		Traffic and Transport - Additional Observations - Scope of Assessment	OBSERVATION 9: The EIA shall confirm the anticipated construction period and opening year of the proposed development. OBSERVATION 10: Transport Scotland would advise that the EIA chapter should identify primary, secondary and / or tertiary mitigation relied upon in the assessment of significant environmental effects. OBSERVATION 11: Full details of the anticipated assessment assumptions, e.g., the volume / percentage of construction material required to be transported to the development site, must be provided in the EIA, supported by appropriate justification. Regarding the volume of material required to be transported to site, Transport Scotland would advise that a worst-case scenario shall be assessed. OBSERVATION 12: The EIA chapter shall detail the potential number of daily, weekly, and total delivery numbers for the proposed development, providing confirmation of: estimated construction employee trips, the number, size, and weight of construction deliveries, and the anticipated schedule for deliveries. OBSERVATION 13: The proposed construction traffic distribution and assignment shall be fully justified in the EIA chapter. OBSERVATION 14: Anticipated operating hours and any associated restrictions must also be confirmed in the EIA. OBSERVATION 15: Transport Scotland would advise that the anticipated schedule for deliveries should set out construction traffic volumes per month throughout the construction period. OBSERVATION 16: The traffic and transport assessment should assess residual impacts associated with the proposed development.	Noted.
Marine Scotland	-	-	No response.	-
Scottish Forestry	-	-	No response.	-
Non Statutory Consultees				
British Horse Society Scotland	23/04/2025	Outdoor Access	Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Under the terms of the Land Reform (Scotland) Act 2003, equestrians have the same rights of access to the outdoors as other non-motorised users, such as pedestrians and cyclists. Equestrian use should therefore be included when planning and designing wind farm proposals. Considering all access takers, including equestrians, in the early stages helps to avoid problems down the line and ensures that projects like this are an opportunity to preserve and improve access for all, rather than curtail it or restrict it to certain groups.	Noted. Consideration to horse riders has been given within the EIAR and would be addressed through the mitigation measures set in the CTMP.

Consultee Name	Date	Topic	Consultee Response	Response
			Although there are no designated core paths within the site, it is possible the public take access on informal routes within the site and in the surrounding area. Consideration should therefore be given to how access will be managed both during the construction phase and when the wind farm is operational. The creation of tracks within wind farms can be an opportunity to improve outdoor access and provide the local community with additional amenity, especially if tracks can offer circular routes for walkers, cyclists, horse riders and others. To achieve this outcome, when completed, the tracks should be suitable for all users. Unconsolidated sharp stone is likely to injure horses so tracks should be finished with a layer of consolidated whin dust. Obstructions to access like cattle or deer grids and locked gates with no side gate should be avoided. Access to paths and tracks is especially valuable in areas of extensive peatbog, where the soft ground makes it difficult or unsafe for access takers, particularly those with horses, to make their own way across open ground. The BHS is here to help and can provide guidance on suitable surfaces and infrastructure to accommodate equestrians and other access takers. We would be very willing to work with the applicant on these aspects.	
		Importance of Off-Road Riding	Access to safe off-road riding routes is vital to the heath and wellbeing of horses and their riders. Equestrian road users are classed as vulnerable as they are more likely to be involved in a road accident and more likely to suffer the worst consequences. Most riding accidents happen on minor roads and with increasing numbers of horses and riders seeking to access the countryside, adequate access to off-road riding should be a priority, especially in rural and semi-rural areas. Few riders access busy roads by choice (although the horse has as much right to be on public roads as cars, bikes and pedestrians) - but they often have few other places to ride or no other way to access their safe off-road riding. Vehicles travelling to and from Neshion are likely to meet equestrians on the road and drivers should be advised of this risk. I have enclosed a copy of our 'Guidance to drivers of large vehicles' document.	
BT	No Date	Telecommunication	We have studied the proposed windfarm development with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that the Project indicated should not cause interference to BT's current and presently planned radio network. BT requires 100m minimum clearance from any structure to the radio link path. It should be noted that this decision is for the date of its issue as the use of the spectrum is dynamic and can change on an ongoing basis. Therefore, please reconsult us if there are any changes during the planning process with heights and locations of any structures, and its finalisation, as we may have new links assigned by Ofcom over its duration.	Noted.
Civil Aviation Authority - Airspace	-	-	No response	-
Crown Estate Scotland	-	-	No response	-
Defence Infrastructure Organisation	-	-	No response	-
Fisheries Management Scotland	-	-	No response	-
Highland and Islands Airports Limited (HIAL)	22/04/2025	Aviation	This proposal is out-with HIAL's safeguarding criteria. Therefore, Highlands and Islands Airports Limited has no objections to the proposal.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
HSE	15/04/2025	Major Accidents and Disasters - General	The proposed development, being a wind farm and battery energy storage facility, is not a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015. The development is not located within a safeguarding zone of an Explosives site licensed under the Explosives regulations 2014 or the Dangerous goods in harbour area regulations 2016. HSE realises that Environmental Risk Assessments are not expected to include general health and safety at work however we take this opportunity to point out that it may be beneficial for employer(s) to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet requirements of relevant health and safety legislation as the project progresses.	Noted.
		Major Accidents and Disasters - major accident hazard pipelines	The proposed development is located within HSE’s land use planning consultation zones for three major accident hazard pipelines: •4213571_ – Laggan Tormore Pipeline/PTDS operated by Total E & P UK Limited •4179828_ – Brent Pipeline – Cormorant Alpha to Sullom Voe operated by TAQA Brantani Ltd •11882_ – Ninian Pipeline operated by BP Explosration Operating Co Ltd There is potential to initiate a major accident at the major accident hazard pipelines, for example, during the development construction phase and potentially the operational phase, because the development area intersects the route of the major accident hazard pipelines. HSE suggests that the EIA should show that the operator of the pipelines has been consulted regarding the following issues or that these issues have been considered in the assessment: •the development restricted area due to the pipelines •ensuring the integrity of the pipelines and protecting the pipelines from development and operational works.	Noted. Consultation with the operator of the COMAH establishments and pipeline operators has been undertaken. Please see the Post Scoping section below for further information.
		Major Accidents and Disasters - major hazard site	The proposed development is located within HSE’s land-use-planning consultation zones for a major hazard site – Total Energies E&P UK Ltd (HSE Ref: H4418). This indicates the proposed development could be vulnerable to harmful effects from an industrial major accident at the nearby major accident hazard establishment. HSE’s advice on the granting of planning permission for relevant development in zones set by HSE considers the issue of such accidents in the vicinity affecting people at the proposed development. That HSE advice can be obtained by the planning authority by using HSE’s Land Use Planning Advice web app https://pa.hsl.gov.uk/ . However, Wind Farms are usually not a relevant development in relation to land-use planning in the vicinity of major hazard sites and major accident hazard pipelines. This is because they do not, in themselves, involve the introduction of people into the area. HSE’s land use planning advice is mainly concerned with the potential risks posed by major hazard sites and major accident hazard pipelines to the population at a new development. Please be aware as the development proposed involves the storage of electrical energy such as in a large battery storage unit and is adjacent to a COMAH (Control of Major Accident Hazards) establishment then please ensure you have consulted with the operator of the COMAH establishment.	Noted. Consultation with the operator of the COMAH establishments and pipeline operators has been undertaken. Please see the Post Scoping section below for further information.
John Muir Trust	-	-	No response	-

Consultee Name	Date	Topic	Consultee Response	Response
Joint Radio Company	08/04/2025	General	JRC analyses proposals for wind energy developments on behalf of the UK Energy Industry. We assess the potential of such developments to interfere with radio systems operated by UK and Irish Energy Industry companies in support of their regulatory operational requirements. The Energy Industry considers that any wind energy development within: * 1000m of a link operating below 1GHz; or * 500m of a link operating above 1GHz, requires detailed coordination For turbines with a blade diameter of 32m or less this distance is reduced to: * 500m for links below 1GHz; and * 300m for links above 1GHz before a detailed coordination is required. There is an EXCLUSION ZONE around most Base Station sites of 500m, i.e. no development is permitted. This will be evaluated on a case by case basis for smaller turbines. Unfortunately, part (or all) of the proposed development breaches one or more of these limits. The affected links are: 460MHz Telemetry and Telecontrol: JESHDHS1 to JESHDHO01 >1GHz Microwave Point to Point: Scottish & Southern Energy (North) 1257766/1 Therefore JRC OBJECTS TO THE PROPOSED DEVELOPMENT.	An analysis of mitigation options has been commissioned from JRC and a Mitigation Study Report was received from JRC on 13/11/2025. Refer to the Post Scoping section below for further information.
			JRC is currently undertaking a report commissioned by the developer / agent regarding the position of the turbines and their impact on nearby links. Until such time as the turbine positions are evaluated fully in the report and/or moved accordingly, this response is a holding objection against the turbine positions and sizes outlined in the Scoping Report. Unfortunately, since these links form part of our critical national infrastructure, no details apart from the link identifiers can now be supplied, due to previous breaches in confidentiality. However, JRC are still willing to work with developers in order to clear as many turbines as possible, including those that may initially fall within the coordination zone. For more information about what to do next, please contact us using the link at the bottom of this email. The JRC objection shall be withdrawn after simple analysis shows no issues; when a satisfactory coordination has been achieved and the zone of protection is implemented; or when an appropriate mitigation agreement is in place.	
Met Office	02/04/2025	Weather Radar	The proposal would be over 340 km from our nearest weather radar and outside of its normal range. Therefore there won't be any adverse impacts and we have no concerns about the proposal.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
Ministry of Defence (MoD) (Defence Infrastructure Organisation)	15/04/2025	Defence / Aviation	I am writing to advise you that the MoD has concerns with the proposal. The principal safeguarding concerns of the MoD with respect to this development of wind turbines relates to the development being detectable by one or more MoD radars as specified and their potential to create a physical obstruction to air traffic movements. Air Defence (AD) radar The turbines will be 44.4 km from, detectable by, and will cause unacceptable interference to the AD radar to Remote Radar Head (RRH) Saxa Vord. Wind turbines have been shown to have detrimental effects on the operation of radar. These include the desensitisation of radar in the vicinity of the turbines, and the creation of 'false' aircraft returns. The probability of the radar detecting aircraft flying over or in the vicinity of the turbines would be reduced, hence turbine proliferation within a specific locality can result in unacceptable degradation of the radar's operational integrity. This would reduce the RAF's ability to detect and deter aircraft in UK sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the UK. Physical Obstruction In this case the development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above terrain features to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area. If the developer is able to overcome the Air Defence issues stated above, to address the impact up on low flying given the location and scale of the development, the MoD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. The development proposed includes wind turbine generators that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to CAA requirements, the MoD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MoD accredited aviation safety lighting.	A Serco mitigation study has been commissioned by the Applicant. The mitigation report confirms that a Non-Auto Initiation Zone (NAIZ) mitigation is feasible. The Serco mitigation feasibility report has been submitted to the MoD and their response was awaited at the time of writing. Effects on air defence radar and low flying have been addressed in Chapter 11: Aviation (EIAR Volume 2).
		Defence / Aviation	Summary The MoD has concerns with this proposal due to the potential impact to the AD radar at Saxa Vord and low flying aircraft operating in the development area. The MoD must emphasise that the advice provided within this letter is in response to the data and/or information detailed above/in the developer's document title 'Neshion Energy Park, Environmental Impact Assessment Scoping Report', dated 5 March 2025. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MoD safeguarding requirements and cause adverse impacts to safeguarding defence assets of capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MoD should be consulted and provided with adequate time to carry out assessments and provide a formal response.	
Mountaineering Scotland	-	-	No response	-
National Gas Transmission	-	-	No response	-
National Grid	-	-	No response	-

Consultee Name	Date	Topic	Consultee Response	Response
NATS Safeguarding	02/04/2025	Aviation	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	Noted.
Office for Nuclear Regulation	02/04/2025	Nuclear Regulation	With regard to planning application EC00006120 Neshion Energy Park, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.	Noted.
RSPB Scotland	14/04/2025	Follow up to questions within Scoping Report	<i>Q7.1: Are the consultees content with the nature and the scope of the ornithological surveys?</i> Overall, we agree with the nature and scope of the ornithological surveys, and the species listed in section 7.2.4 of the Scoping Report as potentially important ornithological receptors. We will be able to comment further when see the results of the surveys that were conducted from 2022-2024. <i>Q7.2: Are the consultees content with how the matters identified are scoped out?</i> Decommissioning We note that decommissioning is proposed to be scoped out of the assessment. The Applicant has argued that this is because: • 'the future base-line conditions (environmental and other developments) cannot be predicted accurately at this stage for 40 years' time', • 'the proposals for decommissioning are not known at this stage' and • 'the best practice decommissioning guidance methods will likely change during the lifetime of the proposed development so cannot be predicted at this stage'. Although we appreciate that there will be more uncertainly over this aspect, it would seem plausible to assess it as far as possible. Decommissioning effects on birds are likely to be just as significant as during the construction phase and we therefore strongly suggest that likely decommissioning impacts are considered and included in the assessment.	An assessment of the ornithological impacts of decommissioning the Proposed Development has not been undertaken as part of the EIA because: (i) the future baseline conditions (environmental and other developments) cannot be predicted accurately at this stage, particularly during an era of rapid climate change; (ii) the proposals for decommissioning are not known at this stage, and (iii) the best practice decommissioning guidance methods will likely change during the lifetime of the Proposed Development and so cannot be predicted at this stage. The operational lifetime of the Proposed Development is 40 years. During the last 40 years there have been huge changes in the UK's avifauna, from wetland species like spoonbill, little egret, great egret, cranes, cattle egret and Mediterranean gull becoming regular breeders, to previously abundant woodland breeding species like willow warbler disappearing from much of England and Wales and others like nuthatch spreading northwards across Scotland. What bird species are likely to be present, as well as habitats, at Neshion in 40 years, during a period of rapid climate change, is simply guess work. Detailed decommissioning proposals would be established and agreed with relevant authorities prior to commencement of decommissioning activities. This would take cognisance of guidance and best practice at the time of decommissioning. A Decommissioning Plan would set out environmental protection measures and restoration principles which will be implemented. This plan would be agreed with SIC.
		Cumulative Effects	We are concerned about the cumulative effects on birds as a result of operational, consented, and planned wind farm developments across Shetland. Due to the potential effects on the upland breeding bird assemblage and nearby SPAs in this case, and the proximity of the large development of Viking windfarm, a robust cumulative/in-combination assessment of collision risk, disturbance, displacement, and barrier effects should take account of all operational, consented and proposed wind energy schemes in central and north mainland Shetland and Yell. Other non-windfarm development which could impact on species should also be taken into account. We also strongly recommend that a cumulative/in-combination wind farm map is produced which shows cumulative development in relation to designated sites, including the Ronas Hill, Otterswick and Graveland SPA's, associated SSSI's and Bordigarth LNCS. We understand that the grid connection needed for such a development would be subject to a separate consenting process and is at present largely unknown: ('it is anticipated that there would be a connection locally' (section 2.2.16). However, it must be recognised that this will be a required element if the wind farm is approved, and it is necessary to consider the likely location and route of such a connection while considering the proposed windfarm. Any overhead lines (or underground cables) are very likely to impact on qualifying species and habitats of the surrounding statutory and non-statutory protected sites, so consideration of transmission options should be considered as part of the assessment rather than simply pushing the issue onto the transmission operator's application in the future. The EIA must consider all the components of the proposal including turbines, battery energy storage system, met masts, borrow pits, all proposed access roads (including the route on public roads to get the turbines on site), on site tracks, drainage, substation, and temporary construction buildings/storage compounds. It should also assess the impacts of all phases of the project	Noted. A cumulative ornithological assessment has been undertaken in line with NatureScot Best Practice Guidance and is presented in Chapter 7: Ornithology (EIAR Volume 2). The Proposed Development would potentially have both a 'private-wire' connection to the neighbouring Sullom Voe Terminal to supply a low carbon fuel plant at the terminal, and a connection to the electricity grid. The details of both connections are currently unknown; however to assess the combined effects of the proposed energy park and the associated connection infrastructure for the purposes of the EIA, Technical Appendix 2.4: Electricity Connection Infrastructure Appraisal (EIAR Volume 4) provides further details. All necessary consents for the connection infrastructure would be the subject of a separate process. The EIAR assesses all components of the proposal including turbines, BESS, borrow pits, on-site tracks and access roads for both construction and operation/maintenance.

Consultee Name	Date	Topic	Consultee Response	Response
			including site selection, design, construction, operation and maintenance and decommissioning. Disturbance, displacement, loss of suitable habitat (breeding, wintering and foraging) and collision risk should be assessed for all scoped in species, both during construction and operation. This should not only include impacts from the wind turbines but also new tracks and infrastructure as well as any existing road widening or upgrades.	
		Biodiversity Enhancement	Policy 1 of NPF4 states that ‘when considering all development proposals significant weight will be given to the global climate and nature crises. Policy 3 states that, ‘Development proposals for national or major development or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention’. It goes on to list a number of criteria which applicants must demonstrate they have met, including ‘significant biodiversity enhancements are provided, in addition to any proposed mitigation’. We agree that development should leave nature in a better state than before it took place and welcome NPF4’s commitment to deliver positive effects for biodiversity through development. The Applicant should consider in detail how positive effects for biodiversity would be delivered at as early a stage as possible, and provide as much detail as they can at the application stage to allow an assessment of whether there would be reasonable certainty that it could be delivered and secured. We welcome that the mitigation hierarchy should be followed, and any mitigation, compensation and enhancement measures clearly and separately identified within the EIA and other accompanying documents. We would welcome the opportunity to discuss the possibilities listed in section 6.3.9 as more details are forthcoming. We support the recognition of peatland restoration opportunities for example, though this cannot be considered as justification for a destruction of high-quality near-natural blanket bog identified in the Study Area (section 6.2.12). Any peatland that is affected would need to be compensated for sufficiently before any restoration could be considered as additional enhancement. We also support in principle the planting of riparian areas, though this needs careful consideration where research suggests that unplanned planting of trees may increase predation of breeding upland wader chicks on open moorland (for which Shetland is of national importance). There may be other suitable ways that biodiversity can be enhanced across Shetland as part of development, and these need further consideration as part of the assessment. We note that the Applicant has said that ecological enhancement measures will ‘where appropriate’ form part of an Outline Biodiversity Enhancement Habitat Management Plan (OBEHMP). This should include an indication of size of any areas to be restored, as well as a comprehensive management programme and monitoring programme for any measures and, habitat improvements and monitoring of breeding birds on the site and SPA-qualifying species. As noted above, the measures or extent of measure that the Applicant is proposing as enhancement need to be clearly separated from mitigation and compensation to allow decision makers to assess whether significant enhancement is actually proposed. In addition to the production of a draft OBEHMP, appropriate Species Protection Plans (SPPs) should be drafted. Lastly, the OBEHMP should also include a protocol for reporting collisions to NatureScot. We are aware that some existing operators already have such protocols in place.	Noted. Refer to Technical Appendix 6.X: OBEHMP (EIAR Volume 4) for further details on the proposed habitat management and biodiversity enhancement measures.
		Peat and Peatland Habitats	Information from the habitat surveys suggests that the Survey Area contains areas of nationally important Class 1 peatland and areas of very wet, high quality blanket bog (Section 6.2.12). These are priority peatland habitats, many of which should be avoided in line with NatureScot guidance. We suggest the preparation of a Peat Management Plan (PMP) that is informed by peat depth probing forms part of the OBEHMP. Peat depth surveys both inside and outside the proposed turbine development areas will help inform the design of the development and any restoration and habitat management plans.	Stage 1 and stage 2 peat depth surveys, a peatland condition assessment and a peatland habitat walkover survey have been undertaken for the Proposed Development. The results of these surveys are presented in Chapter 6: Ecology and Chapter 8: Hydrology, Hydrogeology, Geology and Soils (EIAR Volume 2). A description of the design evolution has been provided in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2), which notes the constraints taken into account during the design process, including peatland. An Outline Peat Management Plan (OPMP) is provided in Technical Appendix 8.5: Outline Peat Management Plan (EIAR Volume 4).

Consultee Name	Date	Topic	Consultee Response	Response
Scottish Canoe Association	-	-	No response	-
Scottish Fire and Rescue Service	-	-	No response	-
Scottish Gas Networks (SGN)	02/04/2025	Gas	SGN do not have any High Pressure assets within the vicinity of the above consultation and as such would have no comment/objection,	Noted.
Scottish Rights of Way and Access Society (ScotWays)	-	-	No response	-
Scottish & Southern Electricity Networks (SSE)	-	-	No response	-
Scottish Water	15/04/2025	Water	Audit of Proposal Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following: Drinking Water Protected Areas A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity. Asset Impact Assessment Scottish Water records indicate that there is live infrastructure in the proximity of your development area that may impact on existing Scottish Water assets. The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our Customer Portal for an appraisal of the proposals. The applicant should be aware that any conflict with assets identified will be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response. Written permission must be obtained before any works are started within the area of our apparatus. Surface Water For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges. In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and-Developers/Connecting-to-Our-Network which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives. Next Steps All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals.	Noted.
Scottish Wildlife Trust	-	-	No response	-

Consultee Name	Date	Topic	Consultee Response	Response
Scottish Wild Land Group (SWLG)	-	-	No response	-
Tingwall Airport	-	-	No response	-
Visit Scotland	-	-	No response	-
Woodland Trust	-	-	No response	-
Community Councils				
Delting Community Council	No Date	General	Following the meeting of Delting Community Council the members would like to submit the following response to the Scoping Report: The members were concerned about the low-level noise and the effect it has on humans and animals. They want more work done to see what the longer-term effects are. The monitors which are there are recording 20hz and above but not 0-20hz therefore there is no evidence to say this low-level noise is harmless or that it does not affect humans or animals. Is the Scottish Government looking at this? The members are also concerned that the data and information the developer is using is from a document written from back in 1997 for the low-level noise. There has been no further research done. In Shetland in general concerns have been raised about low level noise and the health effect it is creating from existing wind farms and they would like the Scottish Government to give guidance through their environmental scoping report as to how the low level noise will affect the community. The members were concerned about the Shadow Flicker and the effect it will have. They want more research done on the effects of this on humans and animals. In the report - 13.3.2 The Scottish Government 81 advises that “where separation is provided between wind turbines and nearby dwellings (as a general rule 10 rotor diameters), ‘shadow flicker’ should not be a problem.” – There are dwellings within this range therefore there will be an effect on the residents and it will be a problem. Will residents be informed when the Shadow Flicker will occur as this would be essential information to residents living nearby or in visual sight. There is also a concern about the red lights on the turbines flickering. The members were concerned about the visual impact the Energy Park will have on the area. They want more research into this. There is no information on how the Energy Park will look or where it will be seen from. In section 14.1.2 The economic effects of the Proposed Development are expected to be beneficial. This is supported by the numerous assessments of socio-economic effects undertaken as part of the EIA process for other wind farm developments in Scotland and elsewhere in the UK. There would be no significant effect to existing economic use of the Site, which is a greenfield, bordering with a large industrial site comprising the Sullom Voe Oil Terminal and associated infrastructure. Accordingly, it is proposed to scope out an assessment of socio-economic effects from the EIAR. - Socio-economic effects include Housing: Changes in housing availability, affordability, and quality. The members would like to know what the consequences of the Energy Park will have on values of domestic dwellings? On a general note, there are a lot of questions within the community which remain unanswered. This needs to be addressed to the satisfaction of the community. The public engagement which was held by the developers did not offer many answers as they were unable to answer a lot of the public’s questions. For example, what were the dates and times of bird surveys? They could not answer this but were going to respond to the questions later once they found the answer but many of these questions are still unanswered.	Chapter 10: Noise (EIAR Volume 2) includes a comprehensive noise assessment following the Scottish approach based on ETSU-R-97 and subsequent Institute of Acoustics good practice. In agreement with the SIC EHO, low frequency noise and amplitude modulation has been scoped out of the noise assessment. A shadow flicker assessment has been undertaken and presented in Chapter 13: Shadow Flicker (EIAR Volume 2). This assessment cosiders the potential for daylight hours shadow flicker. An assessment of the visual impact of the Proposed Development, including the effects of nighttme lighting, is presented in Chapter 4: Seascape, Landscape and Visual Amenity (EIAR Volume 2). This assessment will be supported by visualisations from viewpoints agreed with SIC and ZTV mapping. A separate Socio-economic Statement has been submitted to support the planning application. Property values are not assessed in this report as they are influenced by many factors and there is no agreed methodology for robust, project level predictions. The Applicant has undertaken follow up meetings with members of the local community following on from the first public exhibition event.
North Maven Community Council	-	-	No response	-
Nesting and Lunnasting Community Council	-	-	No response	-

Consultee Name	Date	Topic	Consultee Response	Response
Yell Community Council	-	-	No response	-
Post-Scoping				
Statutory Consultees				
NatureScot	09/07/2024	General	On 25/09 the Applicant contacted NatureScot to invite them to a site visit to discuss the Proposed Development. A site visit was arranged for 20/08.	Noted.
	20/08/2025	Site Visit	NatureScot (NS) emphasised the importance of documenting all design iterations and demonstrating how key receptors were considered and, where possible, avoided. They expect the EIAR to clearly frame the design evolution within the Mitigation Hierarchy as per NFP4 to explain how the final layout was reached. NS agreed with prioritising macroavoidance of key ornithological receptors (e.g., Schedule 1 divers and whimbrel) ahead of other, lesser constraints. They requested an advance summary map of key breeding constraints prior to EIAR submission. NS understood the potential conflict between UK/Scottish nonnative species policy and the locally protected status of mountain hares in Shetland, particularly regarding construction and restoration activities. They will seek internal advice and provide a written steer for inclusion in the EIAR. NS signalled that nationally important peatland/blanket bog issues are likely to be paramount in their response. NS offered an additional site meeting with the core EIAR team focused on peatland/blanket bog once a near final layout that addresses their main concerns is available. During a visit to degraded blanket bog east of the site, NS noted multiple restoration opportunities. They requested a clear EIAR distinction between mitigation/compensation for construction related peat impacts (NS's primary concern) and broader biodiversity enhancements (primarily for SIC to consider). NS were broadly supportive of the draft enhancement measures discussed, noting SIC will be the final arbiter on their adequacy.	On 11/11/2025, the Applicant provided NatureScot with further information regarding the key ornithology constraints within the Site. An overview of the breeding bird surveys undertaken for the Proposed Development was provided, along with a list of the key ornithological receptors within the study area. The Applicant also provided NatureScot with details of the design evolution in response to the key ornithological constraints. On 18/11/2025, the Applicant and NatureScot had a call to discuss the design evolution of the Proposed Development based on the peatland habitats on site. At this point, the Applicant requested feedback from NatureScot on the Proposed Development design and suggestions for habitat management measures.
HES	04/09/2025	Site Visit	HES expressed concerns about potential effects on the setting of the Crooksetter cairns. They highlighted key attributes of setting as the southeast-facing entrances/courts with views towards the lochs and the cairns' quartzite construction, which may have been intended to enhance visibility from the southern approach. HES's primary concern relates to views of the cairns from the south and southeast with turbines visible behind the monuments, rather than views from the cairns to the north. Two additional wirelines were requested, from the lochans in the south of the Site and from the southern approach along the Gas Plant road. HES also requested any available peat depth data from the Hill of Crooksetter to inform interpretation of peat accumulation. HES expressed limited concern about the setting of the Graven cairn and the Kames battery. HES acknowledged that the Kames battery was designed to be concealed with key views out to sea and upwards. HES requested early sight of any proposed lighting scheme. HES also requested a viewpoint from the ferry to represent the maritime approach to the broch at Fulga Ness.	On 10/09/2025, two additional wirelines were provided to HES for review and to advise whether these should be included as photomontages.
	10/09/2025	Follow up call to site visit	HES confirmed that the Gas Plant Road viewpoint was less impactful than expected, whereas the view from the lochan was considered more challenging. In regard to the brochs, HES noted that they would respond in writing subject to internal sign-off, but that they anticipate no further visualisations would be required beyond the agreed wirelines. HES noted that the SLVIA ferry viewpoint could be cross referenced in the assessment. HES indicated that their consultation response will focus on the Crooksetter cairns, with lesser concern for the other assets discussed.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
	01/10/2025	Visualisations	HES recommended that the additional wirelines provided from the lochans in the south of the Site are included as photomontages in the upcoming EIAR. HES requested that two additional photomontages of the Crooksetter cairns be included in the EIAR.	On 01/12/2024 a letter was issued to HES which included a set of visualisations (as requested by HES) and figures. The letter sought to provide an initial assessment of the potential impacts of the Proposed Development on the setting of the Crooksetter cairns based on the Draft Design Freeze. The letter also sought to gain an understanding of HES's position on the Proposed Development and whether the potential impacts on the Crooksetter ciarns, in HES's view, raise issues in the national interest which could lead to objection. The letter provided HES with an opportunity to provide any detail on mitigation by design which could be employed to bring the impact below the threshold for objection.
	14/01/2026	Visualisations	The proposed development is likely to have a significant adverse impact on the integrity of the setting of Crooksetter Hill, chambered cairn at the SE summit (SM3576), and Crooksetter Hill, chambered cairn near the NW summit (SM3608). Based on the information currently available, these impacts appear to be of a level that we would object to the development if consulted on an application in its present form. Crooksetter Hill, chambered cairn at SE summit of (SM3576) and Crooksetter Hill, chambered cairn near NW summit of (SM3608) comprise a pair of Neolithic chambered cairns. Key elements of the monuments' settings include: (1) reciprocal spatial and visual relationships between the monuments; (2) views to the southeast from the cairns, over land directly associated with them and directly out from their forecourts; (3) views of the cairns from the south and southeast, from land they are likely to have been directly associated with and approached from, as well as other cairns, (4) views into the monuments' façades and forecourts, particularly with the white quartz elements of the façades visible, and from the facades over the monuments, and; (5) views from the south towards the cairns on the ridge which emphasise the natural quartz band below. CHVP9 was requested to represent the proposed development when viewed from the forecourt of SM3608. This was requested in our email dated 1 October 2025 and is described in the pre-application letter as: "CHVP9 - looking over the forecourt of Crooksetter cairn NW (SM3608) with the Proposed Development to the north". However, the supplied photomontage has been taken from the extreme north end of the forecourt, looking tangentially onto the centre of the cairn facing west. This positions Turbine 8 peripheral to the forecourt of the cairn. It seems possible that when looking directly onto the face of the forecourt, Turbine 8 would sit directly over the cairn, which is a key view of the monument. The provided photomontage therefore does not fully represent and downplays the potential impact of the proposed development within this key view. We therefore request that an additional photomontage be produced, taken from approximately HU 41768 75892, looking directly onto the forecourt with the proposed development in the background. Interim Assessment We note that the pre-application letter provides a description of these two monuments, including an interim assessment of the proposed development's impacts. The assessment states on pg. 5 'that turbine 8 would not sever the visual connection between the two monuments' This substantially downplays and misrepresents the overall impact. The proposed Turbine 8 would appear directly behind and dominate SM3608 in this key view. It would introduce a large and distracting modern turbine into this view and undermine the dominance of SM3608 in views of the ridgeline. This would detract from the direct visual and wider relationship between the two monuments. The letter states that "views from the centre of the Crooksetter SE cairn are unlikely to have been possible when the cairn was constructed and in use and when the cairn stood at full height as this location would have formed either the interior or the top of the cairn structure." CHVP10 shows a view onto the forecourt of SM3576, with the development in the background, which demonstrates that turbines would feature prominently in this view, a key feature of the monument and which was designed to be visually impressive. Consequently, the turbines would introduce a dominant, distracting moving element into a key view. The assessment states on pg.6 that SM3608 is highly visible above the natural rock outcropping when viewed from the south but that despite the fact that the proposed development would be visible prominently over the ridgeline in this view as shown in CHVP11, "Crooksetter NW would still be a prominent skyline feature in this view"". This assessment omits consideration of the designed visual dominance of SM3608 on the ridgeline, which is enhanced by its deliberate positioning on a natural outcrop of quartz and the use of quartz to make the cairn highly visible in this view. It also attempts to use the presence of the extant met mast and flare stacks to downgrade the integrity of the monument's setting. Views of SM3608 from the south would be significantly altered by the proposed development and the cairn would no longer be the most prominent or dominant feature on the ridgeline. This would challenge the monument for dominance of the ridgeline and introduce a distracting moving element into a key view.	Noted. Photography has been retaken for CHVP9 and this, along with an assessment of the Proposed Development's impact on the Crooksetter cairns is presented in Chapter 5: Cultural Heritage (EIAR Volume 2).

Consultee Name	Date	Topic	Consultee Response	Response
			The assessment sets out on pg.7 that “the presence of turbines in (the view from the southeast) could prove distracting and would alter and potentially diminish the experience of the cairns as horizon features from this specific location. Given that this view, from the southeast in general, has been identified as a key characteristic of setting, it is considered that there would be some loss of cultural significance.” A key approach to the cairns was likely to have been from the southeast. Given the significance of these views and their sensitivity to change, a worst-case scenario approach should be taken to assessment. The impact of the proposal on these views is presently best captured by the supplied CHVP12. We agree with the assessment in the interim assessment that this would “form a distracting feature which could diminish the ability to appreciate and experience the prominent location in which the cairns are sited.” The proposal would introduce a dominant, distracting moving element into these key views, resulting in a diminution of both monument’s settings. Site Access Layout The design freeze layout included in this pre-application shows a ‘Proposed Operation and Maintenance Access Track’ coming within 100m of Crooksetter Hill, chambered cairn near NW summit of (SM3608). This access track is also shown on CHVP11. The addition of this stretch of track and its proximity to the monument is likely to result in a significant impact in its own right. Further information about the need for the track and whether there is any opportunity to re-site the track further to the west and downslope of the monument should be provided. Mitigation At this stage, due to the absence of an adequate visualisation showing the proposed development as viewed from the forecourt of SM3608, we are unable to recommend any specific mitigation for the identified setting impacts.	
SIC: Planning Department	02/07/2025	General	The Applicant provided an overview of the Proposed Development. SIC Planning Officer requested that information on the design freeze is shared once available. SIC Planning officer stated that SIC is a pro-development local authority, adding that they want to see development happen in the right way. SIC Planning Officer noted that they are happy to review information in advance of the application submission. Site visit with SIC arranged for w/c 08/09/25.	N/A
	10/09/2025	Site Visit	SIC advised that they would not be involved in technical discussions around topics such as peat and cultural heritage, with this being left to the statutory consultees as much as possible. SIC noted that resources and capacity for function such as Natural Heritage are extremely limited at the moment. SIC advised that they will consider the application within the balance of planning, noting that an objection from a statutory consultee will not necessarily result in SIC recommending refusal. SIC are supportive of renewable energy development that is of the right scale and in the right place. The Planning Officer noted the proximity of the site to Sullom Voe Terminal and the existing industrialised character of the landscape. SIC have a very strong understanding of the economic importance of the next phase of energy development in Shetland, and how it links to related issues such as housing. The Planning Officer will consider whether the SIC response to the application can be handled within delegated authority. SIC requested a meeting to discuss the design freeze as soon as it is available, this meeting would likely include the Planning Officer and specialist ‘internal consultees’ such as the landscape Planning Officer and Regional Archaeologist.	Noted.
SIC: Sullom Voe Harbour Authority	12/09/2025	Vessel Traffic Service Radars	An initial call was held between Sullom Voe Harbour Authority (SVHA) and the Aviation and Radar consultant for the Proposed Deveopment. In this call SVHA highlighted potential effects on their Vessel Traffic Service (VTS) radars, of which there are three. SVHA requested further information on the Proposed Development turbine coordinates and turbine specifications.	On 15/09/2025 details of the Proposed Development turbine coordinates (at the time) and turbine specifications were provided to SVHA.
	25/09/2025		SVHA highlighted that Turbines 1, 2 and 3 (as per previous turbine numbering) have the potential to cause issues with the Brough Hill VTS radar. SVHA also highlighted that Turbine 4 had potential to cause issue with the Vats Houlland link due to being slightly within the Fresnel zone of the link.	On 25/09/2025 the Aviation and Radar consultation for the Proposed Development clarified that all turbines have been sited outside of the Fresnel Zone for the Vats Houlland link.

Consultee Name	Date	Topic	Consultee Response	Response
				On 05/11/2025 SVHA requested a meeting with the Applicant to discuss potential impacts on the Brough Hill VTS radar. A meeting was scheduled for 10/11/2025.
	10/11/2025		A meeting was held between SVHA and the Applicant. In this call, SVHA confirmed that radar processing techniques would be applied to the Brough Hill VTS radar for the nearby Veri Energy development (consisting of two turbines) and that this processing technique would mitigate the effects of the Proposed Development. SVHA asked for further clarification to be provided on the buffer zone used for the Vats Houlland link.	On 14/11/2025 the Applicant confirmed that an 186 m buffer has been applied to the centre link of the link. SVHA confirmed that the buffer zone is sufficient to avoid any interference.
SIC: Environmental Health Officer (HO)	06/03/2026	BESS and Substation Operational Noise – Scoping Out	On 06/03/2026, TNEI, on behalf of the Applicant, contacted SIC EHO to provide detail of the preliminary modelling for BESS and Substation operational noise and rationale behind proposing to scope it out of the assessment. On 25/03/2026 SIC EHO confirmed that as the noise emission levels are significantly below the background sound levels at all noise sensitive receptors the BESS and Substation operation noise had been sufficiently assessed and could be scoped out of the EIAR.	Noted.
	23/04/2026	Proposed Construction Hours	On 23/04/2026, the Applicant contacted SIC EHO in regard to the proposed construction hours. As the Proposed Development is next to the Shetland Gas Plant and Sullom Voe Terminal, the Applicant has proposed construction hours which do fall outside typical construction hours (Weekdays 7:00-19:00 and Saturdays 7:00-13:00): - Monday to Saturday 0700-1900; and - Sunday 0700-1600. The Applicant asked the EHO as to whether the proposed construction hours are acceptable. On 29/04/2026, the EHO responded agreeing that due to the remote location, Sunday working would be allowable. As there are different permissible noise levels outwith the ‘day-time’ working period, the EHO has suggested a planning condition to be included concerning construction noise levels. The EHO stated that the developer must adhere to the threshold levels stated in Table E.1 BS5228. Further, they noted that bank holidays are included within the ‘evenings and weekends’ thresholds.	Noted.
Non-statutory Consultees				
Arqiva	09/03/2026	Telecommunications	In response to an email sent on 02/03/2026 requesting confirmation as to whether the Proposed Development could have an effect on any of the operational links in the area, and if so, what the required minimum separation distance would be, Arqiva responded to confirm that they had no concerns regarding the Proposed Development. Arqiva confirmed that T1 is the closest turbine at approximately 750 m NE of the nearest RBL path.	Noted.
JRC	13/11/2025	JRC Mitigation Study	Several mitigation options were investigated by JRC. JRC's and SSE's approved option is to implement a bayed antenna configuration at Firth Substation and Shetland Gas Plant Substation.	Discussions with JRC and SSE on the process for implementing the mitigation measure is ongoing.
North Sea Midstream Partners (PX Limited)	02/12/2025	Major Pipelines Call	A call was held with PX Limited (PX), North Sea Midstream Partners (NSMP) O&M provider for its Shetland assets, to introduce the Proposed Development and discuss any potential risk factors in regards to the Proposed Development's proximity to the Major Pipelines and in particular the areas where the Proposed Development access track crosses the pipelines. PX advised that the pipelines in the area are buried to a depth of approximately 1.2 m and requested that all borrow pits are to be kept at least 50 m from these assets, with an additional 5 m inner safety zone. PX suggested the use of local quarries where this stand off cannot be achieved and recommended that the Proposed Development follows established National Gas guidance for working near pipelines. PX highlighted that pipeline crossing agreements can be lengthy to secure and raised concerns about potential vibration impacts from excavation, including risks of pipeline slumping or water ingress. It was also noted that one proposed borrow pit was situated in close proximity to an ESP installation, which reinforced the need for appropriate set back distances to be considered.	The pipeline crossing structure will be determined at detailed design, post consent in consultation with PX. Emergency service access along the Gas Plant road would be maintained during construction. A CTMP would be implemented as part of the construction process and this would include measures to ensure that the access road is kept free of stationary traffic and the route is available for emergency vehicle access.

Consultee Name	Date	Topic	Consultee Response	Response
			The SIRGE pipeline—owned by NSMP and TotalEnergies and forming the sole gas export route from the West of Shetland fields—has its next inspection in 2030. Access via the main road would avoid this asset entirely. PX highlighted their role in decisions on the Gas Plant access road. The BP pipeline is considered suitable for a slab-designed crossing, but PX requested a review of the proposed design, with their staff present during installation and relevant documentation (MDR, crossing and construction agreements) followed. They confirmed that Pipeline Safety Regulations apply rather than COMAH, emphasised that emergency service access to the Shetland Gas Plant must remain unobstructed, and noted that their input should be reflected in the CTMP.	
Shetland Gas Plant	27/10/2025	COMAH Establishment Call	A call was held with relevant personel from Shetland Gas Plant (SGP) to introduce the Proposed Development and discuss any potential risk factors which the COMAH Establishment would like to highlight. SGP clarified that the Proposed Development would be classified as a 'neighbouring workplace' as per the COMAH regulations and that implications for any on site staff during the construction and operation phases would need to be considered. It was agreed that once the Proposed Development is consented, a workshop would be organised with all relevant COMAH operators from neighbouring sites to carry out an Operational Hazard Identification Exercise.	On 14/11/2025, the Applicant provided SGP with a COMAH Consulation document, which provided further information on the Proposed Development and its infrastructure and next steps should the Proposed Development be consented. The document also included questions for the COMAH Establishment to provide feedback on the Proposed Development and specific risk factors.
Sullom Voe Terminal	05/11/2025	COMAH Establishment Call	A call was held with relevant personel from Sullom Voe Terminal (SVT) to introduce the Proposed Development and discuss any potential risk factors which the COMAH Establishment would like to highlight. No specific concerns were highlighted by SVT at this time, however, the Applicant outlined that once the Proposed Development is consented, a workshop would be organised with all relevant COMAH operators from neighbouring sites to carry out an Operational Hazard Identification Exercise.	On 14/11/2025, the Applicant provided SVT with a COMAH Consulation document, which provided further information on the Proposed Development and its infrastructure and next steps should the Proposed Development be consented. The document also included questions for the COMAH Establishment to provide feedback on the Proposed Development and specific risk factors.
GateCheck Consultation Responses				
NatureScot	16/01/2026	Gatecheck	At the scoping opinion request stage, the proposal comprised 10 turbines. We note that this has been reduced to 8, with turbines 6 and 10 being removed at the Design Chill stage due to a variety of considerations including deep peat and proximity to water courses and key ornithological centres. We would welcome the opportunity for further discussion with the applicant in relation to the proposed layout, specifically the placement of turbine 1. We recommended at the Scoping stage that the proposed locations of turbines 1 and 2, which were within the boundary of Yell Sound Coast Special Area of Conservation (SAC), be moved out with the SAC, and that a buffer from the Protected Area boundary could help reduce impacts to otter using the terrestrial part of this SAC. Whilst turbine 2 has been moved out with the SAC, we note from Figure 2.3 in Appendix 1 that turbine 1 and associated hardstanding area is still partially within the SAC.	On 26/02/2026 the Applicant provided a response to NatureScot’s Gatecheck Consultation Response. The following information was included in the Applicant’s response: Turbine 4 (formerly Turbine 1) and its associated hardstanding are located outside the boundary of the Yell Sound SAC. Presently, based on an early stage conceptual design, there is the potential need for a small section of earthworks (fill) within the SAC boundary – this encroaches approximately 4 m into the SAC designation and occupies an area of <0.001% of the total SAC designation. Given that the SAC is designated for harbour seal and otter, it is considered unlikely that such limited earthworks within this area would directly affect the qualifying features of the SAC, although it is acknowledged that there is the potential to reduce foraging ground for otter and there is potential for disturbance.. The Applicant notes that the position of the earthworks design can be reviewed at a later stage (post-consent) as part of the detailed design. Further consideration would be given to the environmental benefits that would be achieved through micro-siting at this stage, with full consideration of the appropriate mitigation available to avoid or reduce disturbance impacts on the qualifying features of the SAC. Further mitigation for otter would include pre-construction surveys, the use of otter friendly fences, appropriate exclusion zones from any holts, and provision of artificial holts in suitable locations. Wider peatland restoration associated with the Proposed Development would likely also benefit otters due to a likely increase in prey species. The Applicant is open to engaging further with NatureScot, at an appropriate stage following submission of the application, to discuss how a planning condition can be used to secure necessary mitigation measures to ensure that adverse effects on the integrity of the SAC are avoided, with no reasonable scientific doubt.
			In our scoping response, we asked in our follow-up questions in Annex A if the developers were proposing to scope in bat survey work. For clarity, bat surveys are not required, and bats do not need further consideration, as they are not known to be resident in Shetland. See our Standing advice for planning consultations – Bats.	Noted.

Consultee Name	Date	Topic	Consultee Response	Response
			We maintain our previous ornithology advice outlined in our scoping response of 07 May 2025, including the importance of non-breeding Vantage Point survey work (September to April). We encourage dialogue from the applicant to agree survey methodology.	On 26/02/2026 the Applicant provided a response to NatureScot’s Gatecheck Consultation Response. The following information was included in the Applicant’s response: In line with the Best Practice Bird Survey Guidelines, two full years of vantage point (VP) survey effort has been undertaken. In addition, targeted breeding diver focal watch surveys were undertaken at key breeding lochans over extended observation periods to record incoming and outgoing flightlines. Further detail is presented in Chapter 7: Ornithology (EIAR Volume 2) .
			As stated in our scoping response, the development site supports a high proportion of M17 and M19 Priority peatland communities, where impacts have the potential to raise issues of national interest. We reiterate that habitat condition should be assessed by following our Best Practice Guidance https://www.nature.scot/doc/advising-peatlandcarbon-rich-soils-and-priority-peatland-habitats-development-management .	A Peatland Condition Assessment has been undertaken in accordance with NatureScot best practice guidance and details of this are presented in Chapter 6: Ecology (EIAR Volume 2) .
			We would recommend that the applicant refers to the guidance available on our website and the Scottish Government’s draft planning guidance on biodiversity when developing the detailed Habitat Management Plan.	Noted.
	12/03/2026	Gatecheck - Applicant Response	<u>Location of Turbine 1</u> In our response we noted that turbine 1 and associated hardstanding area is still partially within Yell Sound Coast SAC. The applicant’s response document clarifies that the proposed location of turbine 1 and hardstanding is fully outwith the SAC, although a section of associated earthworks encroaches 4m into the SAC. The applicant notes that the position of the earthworks design can be reviewed at a later stage (post-consent) as part of the detailed design. The applicant is open to engaging further with NatureScot, at an appropriate stage following submission of the application, to discuss how a planning condition can be used to secure necessary mitigation measures to ensure that adverse effects on the integrity of the SAC are avoided, with no reasonable scientific doubt. We can confirm that this approach is acceptable. <u>Bird Surveys</u> We acknowledge the applicant cites an error in the section 7.2.7 of the Scoping Report which states that ‘Vantage Point (VP) watches were undertaken between April and September 2022 and 2023’. They clarify that 2 years of vantage point surveys were conducted from April 2022 through to March 2024. The latter survey duration would meet the minimum requirement of 2 years of surveys to allow for variation in bird use between years, as described in Section 3.5 of our guidance on recommended bird survey methods to inform impact assessment of onshore windfarms. Our full guidance can be found here: https://www.nature.scot/doc/recommended-bird-survey-methods-inform-impact-assessment-onshore-windfarms#4-timing-of-survey-visits. <u>Cumulative Impact Assessment Spreadsheet</u> The applicant has requested that we provide a cumulative impact assessment spreadsheet containing all relevant metrics required for a comprehensive cumulative evaluation. This is not something we provide. However, the guidance below has an example table at the bottom, which should hopefully be of assistance. https://www.nature.scot/doc/guidance-assessing-cumulative-impacts-onshore-wind-farms-birds <u>Shetland National Scenic Area Assessment Scope – Special Landscape Qualities (SLQs)</u> Table 2 of the applicant’s response details the NSA SLQs and specifies those that they propose to include in their detailed assessment. We agree with omitting consideration of SLQ1: <i>The stunning variety of the extensive coastline</i> as this SLQ largely relates to the physical variety in the coastline, and SLQ9: <i>Northern light</i> accounting for existing baseline light levels. We continue to request inclusion of: SLQ2: <i>Coastal views both close and distant</i>	Noted. On 12/03/2026, the Applicant responded to NatureScot to clarify whether it agreed with the proposal to assess only the three closest NSA areas (North Roe, Eshaness & Muckle Roe) to the Proposed Development in the NSA assessment. NatureScot confirmed that they were in agreement with this proposal.

Consultee Name	Date	Topic	Consultee Response	Response
			- SLQ3: <i>Coastal settlement and fertility within a large hinterland of unsettled moorland and coast</i> (it's possible that the proposed development will be visible from settlement within the NSA such as from farmsteads and residential properties in the North Roe area). - SLQ4: <i>The hidden coasts</i> - SLQ6: <i>A sense of remoteness, solitude and tranquillity</i>	
SEPA	05/12/2026	Gatecheck	We welcome the approach outlined in the gatecheck report that seeks to reduce adverse effects on peat and carbon rich soils (and other constraints). However, we consider that there is scope to further avoid deeper peat and carbon rich soils and so demonstrate how the layout meets the requirements of NPF4 policy 5.a, as set out in section 1 below. There is also insufficient information in the gatecheck report for us to be confident that adverse effects have been appropriately considered and addressed in relation to groundwater dependent terrestrial ecosystems (GWDTE) or private water supplies. Peat and Carbon Soils We note that figure 5.1 of the gate check report has the same layout as figures 2.3 and 2.4 but uses different turbine numbering. For the avoidance of confusion, our advice below uses the numbering in figure 2.4 as that figure shows the main constraint we refer to below (peat and carbon rich soils). In our scoping advice (8 April 2025, our reference PCS-20005108) we stated that layout that makes use of spurs or loops is unlikely to be acceptable. It is therefore disappointing to see a number of spurs and looped tracks creating triangles are proposed. As a result, we do not consider that the current layout meets the requirements of NPF4 policy 5.a. This is because, based on the available information, it appears that there is scope to make comparatively minor adjustments to the proposed layout to remove the triangles and spurs. This would reduce ground disturbance and adverse effects on peat and carbon rich soils (and associated peatland habitats), as well as the potential for generation of excess material that may require waste authorisation. We therefore recommend that the layout is amended so that: Turbine 3 and associated hardstanding are aligned with the main track in the same way that turbines 2, 4, 5 and 9 are, rather than being on a separate spur off the main track as currently proposed. This would reduce adverse effects on peat and carbon rich soils, as figure 2.4 indicates that the turbine and associated hardstanding would then be in shallower peat. Turbine 8 are aligned with the main track rather than being on an additional spur off the main track. If the spur was removed and the turbine and hardstanding were aligned with the main track, the main track at this point could also be moved to the west so as to avoid the area of deeper peat that it currently heads northwards through. Figure 2.4 indicates that removing the spur and adjusting the main track to the west would result in the main track being in shallower peat than currently proposed, while the turbine and hardstanding would be on the same of similar peat depth – but the removal of the spur would result in a lesser effect on peat overall.	In response to the comments and recommendations received from SEPA, the Applicant has implemented a number of specific design changes to further reduce the potential impacts on peat and carbon rich soils. These amendments have been developed to address the issues highlighted by SEPA and to demonstrate the Applicant's commitment to minimising environmental disturbance within the Proposed Development: - Turbine 3 Realignment: Turbine 3 has been repositioned to the north-west, and its associated hardstanding has been reorientated to align directly with the main access track. This amendment minimises the extent of peat excavation required. - Access Track Rationalisation at Turbines 1, 7, and 8: The access tracks serving Turbines 1, 7, and 8 have been rationalised, specifically, the triangle arrangements have been removed, thereby reducing the overall disturbance to peat. - Realignment of Access Track between Turbines 1, 3 and 4: The access track connecting Turbines 1,3 and 4 has been realigned to reflect the revised position and orientation of Turbine 3 and its hardstanding. This ensures continuity of access while minimising peat disturbance. While the Applicant has incorporated the majority of the recommendations from SEPA, there remain two specific recommendations that could not be accommodated at this stage. The reasons for not implementing these amendments are detailed below: - Turbine 8 and Access Track Realignment: Realigning Turbine 8 onto the main access track would position it too close to the wakes of Turbine 5 and Turbine 4, potentially impacting their efficiency. Additionally, moving the main access track westward is not possible due to bog pool habitats in the area which are currently being avoided. - Removal of Turbine 2 Spur: The hardstanding arrangement for Turbine 2 is currently indicative and may be amended after consent, once a specific turbine model is selected. The inclusion of the tail at the end of the turbine hardstanding represents a worst-case scenario, as some turbine manufacturers may not allow hardstanding reconfiguration. While the tail may not ultimately be required, it has been retained in the present design to account for all potential requirements. A description of the evolution of the Proposed Development design is provided in Chapter 3: Design Evolution and Alternatives (EIAR Volume 2).
			As no information has been provided about survey results for groundwater dependent terrestrial ecosystems (GWDTE) it is not possible to say whether or not this aspect has been satisfactorily addressed as part of the design iterations or EIA process. We expect the scoping advice set out in Appendix 1, section 5 of our scoping response letter to be followed for GWDTE. Sufficient information must be presented the EIA Report to enable readers to consider the results of any GWDTE assessments undertaken.	As no GWDTE were identified within the Site, there has been no requirement to incorporate specific measures for GWDTE within the design process. The GWDTE assessment is presented in Technical Appendix 8.2: GWDTE Assessment (EIAR Volume 4).
			We could not find information about ground water abstractions (private water supplies), so it is not possible to know whether this aspect has been considered and used to inform the design iterations or EIA process. We expect the advice set out in Appendix 1, section 5 of our scoping response letter to be followed for groundwater abstractions and that sufficient information is presented the EIA Report to enable readers to consider the results of any groundwater abstraction assessments undertaken.	On 30/06/2025 SIC confirmed that there are no registered private water supplies within 2km of the Proposed Development. As such, there has been no requirement to incorporate specific measures for private water supplies within the design process.

Consultee Name	Date	Topic	Consultee Response	Response
			For clarity, we expect the proposed borrow pits to be included as part of the EIA process, EIA Report and S36 application, along with the turbines, tracks, BESS and all other associated infrastructure. This is because they are an essential component of the proposed development and would have environmental effects that must be adequately assessed and mitigated as part of the EIA process.	Noted. All infrastructure which forms part of the Proposed Development has been included in the EIA Report. Technical Appendix 2.2: BPA (EIAR Volume 2) presents the borrow pit assessment.
			We reiterate our scoping advice (Appendix 1, section 1.2) that all figures must be based on an adequate scale with which to assess the information. The figures in the gatecheck report have unfortunately made it challenging to ascertain the detail of the location of infrastructure in relation peat in particular. (For example it appears that the track going south from turbine 8 goes through the buffer area for an area of near natural peat condition, but it is not possible to tell whether there is sufficient space to the southwest to move the track outwith the buffer but still within the red line boundary.) While we have still been able to provide advice as set out in section 1 above for the current gatecheck stage, consideration of the final layout as part of the future S36 application will require larger scale figures to be provided. As well as an overall whole site figure, multiple figures should be provided splitting the site into sections using larger scale maps. Such figures should show greater detail of where different elements of the proposed development are located in relation to those interests, to enable assessment of where constraints and buffers are in relation to proposed infrastructure, etc.	Noted. Figures at an adequate scale have been provided within the EIAR Volume 3a .
	30/01/2026	Gatecheck	We welcome that amendments to the layout have been made where feasible, reducing adverse effects on peat and carbon rich soils. Thank you for providing clear explanations and justifications in response to our gatecheck queries - we recommend that these are included in the EIA Report (with turbine numbering updated to reflect the numbering used in the application), to help demonstrate how the mitigation hierarchy for NPF4 policy 5.a has been used to inform and refine the layout.	Noted. Chapter 3: Design Evolution and Alternatives (EIAR Volume 2) presents the design evolution of the Proposed Development and the constraints considered during the design process.
HES	16/01/2026	Gatecheck	Thank you for consulting us on this gatecheck report. We are generally content with the summary of our scoping and pre-application advice. We note the revised turbine layout and the reduced development boundary since scoping. The figures in the report provide a level of detail not previously available, particularly the locations of proposed access tracks and ancillary infrastructure/works. This may affect our comments on the EIA report.	Noted.
SIC	13/02/2026	Gatecheck	It is noted that the comments provided by the Council's Natural Heritage Officer regarding potential impacts on the Wild Land Area are not proposed to be subject to detailed assessment within the EIA. We would reiterate that detailed landscape-related feedback was provided in our original scoping response in relation to potential effects on the Wild Land Area. We strongly encourage a revisit of our original comments. If impacts on Wild Land Areas are not proposed to be included within the EIA, it should be clearly recognised that such impacts would still be subject to assessment in the determination of any subsequent application. At this stage, we are not asserting that impacts on Wild Land Areas would necessarily be significant in nature; however, it is our view that these impacts warrant review and consideration, and it would therefore be beneficial to include this assessment at the EIA stage. As discussed with the applicant, it has been made clear that the Council currently does not have in-house landscape expertise. While we are working towards reinstating capacity within the team, the above advice is provided in the interim. It should be noted that, once further applications are submitted and landscape expertise is available again, additional comments may require to be addressed.	As per NatureScot guidance and in line with NPF4 Policy 4, a full wild land assessment has not been undertaken for the Proposed Development. The wild land qualities of WLA42 Ronas Hill and North Roe have been accounted for in the assessment of landscape character within the WLA. A viewpoint has also been provided from Ronas Hill with is a key attribute of the WLA, the assessment of this viewpoint is presented in Technical Appendix 4.4: Viewpoint Assessment (EIAR Volume 4).
			We note that the applicant has not undertaken, and is not proposing to undertake, aquatic macrophyte surveys. However, it is stated that the EIA will comply with the requirements set out in the MD-SEDD standing advice for onshore wind farms. We also note that the proposal includes a number of watercourse crossings. The Natural Heritage team will review the information submitted with the final application to determine whether further information or assessment is required in relation to aquatic ecology and watercourse impacts.	Aquatic macro-invertebrate surveys have not been undertaken as these are not typically influential in the consenting process and are generally used for water quality monitoring and establishing baseline conditions. Their inclusion at this stage is therefore not considered necessary for the EIA. Should consent be granted for the Proposed Development then baseline aquatic monitoring would be established following standardised methodologies.

Consultee Name	Date	Topic	Consultee Response	Response
				The only relevant exception is freshwater pearl mussel, a legally protected species known to occur in Shetland. Walkover surveys have confirmed that none of the watercourses within the Site boundary have the capacity to support this species. This has been addressed in Chapter 6: Ecology (EIAR Volume 2) .
			The applicant has stated that the ornithological surveys undertaken during 2022–2023 complied with NatureScot guidance current at the time of survey, and that the established EIA approach is to apply best-practice methodologies available at the point the work is undertaken. It is also noted that Chapter 7 (Ornithology) of the Environmental Impact Assessment Report (EIAR) will clearly set out the survey methods used, with reference to the relevant guidance. However, given the range of species recorded, including a number listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), we consider it important that any relevant changes to survey guidance introduced following the NatureScot update in March 2025 are clearly identified and highlighted within the EIAR. This will assist in ensuring transparency and confidence in the robustness of the assessment.	Noted.
			We further request that the impact assessment clearly includes consideration of effects arising from permanent drainage infrastructure. This should be clearly mapped within the EIAR, with a clear distinction made between proposed permanent and temporary drainage, to allow for effective review of potential impacts.	Noted.