

Annex 2. Further specific comments.

The following points, noted in the RSPB Scotland response to the 2009 ES, do not appear to have been addressed in the Addendum and remain relevant. References are to the 2009 ES.

4.2.4 Control buildings and sub-stations

Paragraph 4 on page 4-6 indicates that the Delting substation at Wester Scord will be connected to the converter station by means of a wooden pole-mounted 132 kV trident line. Viking Energy and SHETL previously indicated that all cabling will be underground but this section of overhead line remains in the Addendum.

- **This section of overhead line should be undergrounded, in order to reduce the risk of bird collisions.**

4.2.6 Anemometers

- (a) **Permanent masts; and**
- (b) **Temporary masts**

- **No anemometer masts should be constructed within 500m of diver breeding lochs or merlin nest sites in order to minimise the possibility of bird collisions.**

4.3.2 Borrow pits

- **No borrow pits should be constructed within 500m of diver breeding lochs or merlin nest sites in order to minimise disturbance to these species.**

4.4.3 Working hours

We note that it is anticipated that works will be concentrated in the months March to September, a period which includes the breeding seasons for all the important bird species.

- **Detailed plans will need to be agreed with SNH and RSPB Scotland in order to avoid disturbance to whooper swan, red-throated diver, merlin and whimbrel, species specially protected in the UK by reason of being included in Schedule I of the Wildlife and Countryside Act 1981 (as amended).**

4.4.4 Concrete batching plant

The ES indicated that one batching plant is to be located at Sae Water, which holds breeding wigeon, although other locations are unspecified. The Addendum gives no further details.

- **Details of locations and water sources for all batching plants must be agreed with SNH and SEPA. The vicinity of Sae Water should be avoided, to prevent draw down or pollution of the loch and disturbance to breeding wigeon.**

4.6 Decommissioning

We note that it is intended to leave buried structures in place, which is incompatible with the statement in chapter 16 that site hydrology will be restored after the 25-year lifetime of the development. The hydrology of the site must be maintained in a sustainable condition at the end of the 25-year life of the development in order to support a high-value upland habitat. However, physical removal of turbine bases and hardstanding at the time of eventual decommissioning may be more damaging than leaving such structures in place. The decision on whether or not to remove buried concrete or hardcore must be made in the light of best scientific evidence available at the time and economic considerations must play no part in this decision.

- **The hydrology of the site must be restored to a satisfactory condition at the end of the 25-year life of the development.**

4.11.3 Layout

Paragraph 1. Whilst we welcome the reassurance that an on-site Environmental Clerk of Works (ECW) will be employed, given the huge scale of operations, more than one will be necessary.

- **An ECW must be present whenever work is carried out in each sector of the development and, for such a large development, it will be necessary to engage an ECW for each sector in which work is taking place.**

Chapter 15. Roads and Traffic

15.6 Impact Assessment

Bullet point one on page 16-21 states

“Vegetate exposed surfaces, with quick growing plants.” We emphatically reject such a stipulation, which could lead to the introduction of non-native species and would profoundly alter the integrity of existing vegetation.

- **Any exposed surfaces of peat should be restored using previously-removed acrotelm turfs or native plant species.**

Chapter 17. Socio-economic Assessment

17.7 Mitigation

Bullet point seven suggests promotion of access into the Viking area. It is likely that increased access into the area would cause additional disturbance to birds breeding there and could reduce their productivity.

- **Vehicular access should be very strictly controlled, with locked gates to prevent unauthorised entry, especially during the breeding season.**

Chapter 19. Recreation and Tourism

19.6.4 Operational impacts

(c) Access provision

We welcome the statement in paragraph three that *“Increased access would therefore require to be appropriately managed”*.

19.7 Mitigation

We welcome the commitment in bullet point 4 to an access management plan. However, this must be aimed primarily at preventing disturbance to important bird species during the breeding season and preventing damage to the blanket bog habitat.

Peter M Ellis
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