



EIA: Supplementary Environmental Information

Sandy Knowe Wind Farm Extension

SEI Chapter 6: Other Considerations

Sandy Knowe Wind Farm Limited



October 2023



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- SEI Figure 6-1: Aviation Lighting Plan
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- SEI Figure 6-3: Site Layout and Micrositing

This report also is supported by the following Figures associated with the SEI:

SEI Figure 3-1 Revised Floating Track Proposals

SEI Figure 3-3 Drain Blocking Proposals

Appendices

This report also is supported by the following Appendices associated with this SEI:

SEI Appendix 1-1 : Post Submission EIA Consultation Responses

This report also is supported by the following Appendices associated with the 2022 EIA:

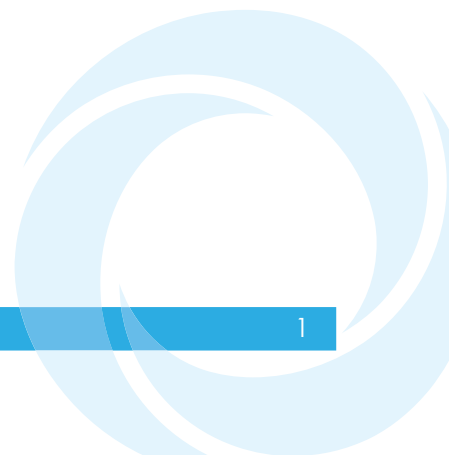
Technical Appendix 14-2 Outline Habitat Management Plan (OHMP)

Glossary of Terms

Term	Definition
The Applicant	Sandy Knowe Wind Farm Limited
The Agent	ERG Holding UK Limited
Environmental Advisors and Planning Consultants	Atmos Consulting Limited
Environmental Impact Assessment	Environmental Impact Assessment (EIA) is a means of carrying out, in a systematic way, an assessment of the likely significant environmental effects from a development.
Environmental Impact Assessment Regulations	The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations)
Environmental Impact Assessment Report	A document reporting the findings of the EIA and produced in accordance with the EIA Regulations
The Proposed Development	The Sandy Knowe Wind Farm Extension
The Proposed Development Footprint	The area within which the Proposed Development will be located
The Proposed Development Site	The full application boundary including Sandy Knowe Wind Farm and Sandy Knowe Wind Farm Extension

List of Abbreviations

Abbreviation	Description
ECU	Energy Consents Unit
EIA	Environmental Impact Assessment
NTS	Non-Technical Summary
SEI	Supplementary Environmental Information



6 Other Considerations

6.1 Introduction

As stated in SEI Chapter 1, Introduction, this chapter presents responses and clarifications to consultees responses for the Proposed Development, as detailed in SEI Appendix 1-1.

Further information and clarifications are also presented by the Applicant including a proposed Aviation Lighting Plan and proposals for an outdoor education trail as part of the Proposed Development. A tabulated summary of responses to other non- SEI matters is also included.

This SEI chapter has been prepared by Atmos Consulting Limited.

6.2 Clarifications

6.2.1 Aviation Lighting Plan

As the the Proposed Development would be an extension of the consented Sandy Knowe Wind Farm (SKWF) (ECU00000660) the proposed Aviation Lighting Plan options detailed below encompass both developments.

Currently the Applicant has agreement for the consented SKWF with MOD that cardinal Turbines T2, T24, T21, T8 are fitted with both visible red lighting and infrared lighting whilst the perimeter turbines T1, T9, T13, T17, T23, T22, T16, T12, T7, T6, T4, T3 are fitted with infrared lighting. The remaining SKWF turbines T10, T14, T19, T20, T15, T11, T5 are not fitted with any form of aviation lighting.

Proposed Aviation Light Plan Option A:

It is proposed that the current visible red lighting be removed from cardinal turbines of SKWF, retaining only the infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point to reduce nighttime light pollution for the local community.

It is proposed that the remainder of the perimeter turbines of the combined SKWF (T1, T16, T12, T23, T22 and previously classed cardinal turbines T2, T8, T21, T24) and Proposed Development (T25, T26, T27, T28, T29, T30) have infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point.

It is proposed that no other turbines within SKWF (T10, T14, T19, T20, T15, T11, T5 and SKWF previously classed perimeter turbines T3, T4, T6, T7, T9, T13, T17) or the Proposed Development would require aviation safety lighting.

Proposed Aviation Light Plan Option B:

Alternatively the Applicant has provided a proposed infrared lighting plan (SEI Figure 6-1) specifying the turbines which it is proposed are equipped with MOD-accredited aviation safety lighting. As the Proposed Development is an extension to the consented, operational Sandy Knowe Wind Farm (ECU Reference: ECU00000660), the proposed infrared lighting plan refers to both the consented, operational Sandy Knowe Wind

Farm and the Proposed Development and adopts the general principles of the conditioned, operational Sandy Knowe lighting plan.

It is proposed that the cardinal turbines of the combined development comprise 2 perimeter turbines of the consented Sandy Knowe Wind Farm (T21 and T24) and 2 perimeter turbines of the Proposed Development (T25 and T28); these would be fitted with 25 candela omni-directional red lighting and infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point.

It is also proposed that 7 perimeter turbines of the consented Sandy Knowe Wind Farm (T2, T8, T12, T16, T17, T22 and T23) and 4 perimeter turbines of the Proposed Development (T27, T26, T29 and T30) should be fitted with 25 candela omni-directional red lighting or infrared lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point.

It is proposed that no other turbines within Sandy Knowe Wind Farm (T3, T4, T5, T6, T7, T9, T10, T11, T13, T14, T15, T18, T19 and T20) or the Proposed Development would require aviation safety lighting.

The Applicant is currently engaged in discussion with the Ministry of Defence (MOD) to reach agreement on this plan.

6.2.2 Outdoor Education Trail

Volume 1 Chapter 12 Socio-economics, Tourism and Recreation of the 2022 EIA, clearly demonstrates that the Applicant is committed to exploring the opportunities for social and community benefit which the Proposed Development can offer to the region. This SEI offers further expansion on this commitment; the Applicant proposes to include an outdoor education trail at the Proposed Development Site.

SEI Figure 6-2 illustrates the proposed route for a trail which will act as a key enhancement, encouraging and improving low impact access to the Proposed Development Site. This trail follows the proposed new access track for the Proposed Development, connecting T30 to the existing tracks of the consented Sandy Knowe Wind Farm turbines T13 and T18. This route then loops to the south, connecting to the existing walking route which connects the turbines of the operational Sandy Knowe Wind Farm (T14, T16, T20, T22 and T23). The trail will increase public access to the Site where visitors can learn about the biodiversity enhancements which the Applicant has committed to.

The trail will offer an immersive and interactive educational journey along the tracks of the Proposed Development where visitors will encounter educational material through a series of interpretive signs, interactive displays (using QR codes and geocaches) designed to offer insight into the peatland restoration and habitat management being carried out around the turbines T29 and T30. This educational material will describe the species of flora and fauna that the habitat management areas (HMAs) and peatland restoration have encouraged to return to the Site whilst offering a broader explanation of the context of the geology, ecology and ornithology of the Proposed Development Site within the UK. The use of the trail by local groups will aid in fostering a deeper understanding and appreciation of the natural world amongst members of the public, promoting outdoor learning with information provided specifically targeted to engage all age groups.

The final route design will be refined through public consultation if consent is granted for the Proposed Development. The associated works remain within 10m of the existing track therefore there will be no additional habitat loss to that already detailed within the 2022 EIA.

Whilst this addition will provide further beneficial socioeconomic impact it is not predicted to change the significance of effects outlined in Chapter 12 Socio-economics, Tourism and Recreation of the 2022 EIA.

6.3 Response to non-SEI matters

A tabulated summary of clarifications of the Applicant's response to non-SEI matters is provided in Table 7-1.

Table 6-1: Summary of Clarifications

Consultee	Post submission Consultation	Response from The Applicant
BT Group	The consultation response received from BT on 22/09/2022 (SEI Appendix 1-1) states an objection due to three turbines (T25, T26 and T28) being within the buffer zone of a planned BT Fixed Link.	<p>The Applicant commissioned Pager Power to engage in consultation with BT and to carry out 3D Fresnel zone calculations to determine if turbines would cause interference to BT's current and presently planned radio network, fixed link 106446/1.</p> <p>It was determined that T28 will not cause interference with the fixed links which cross the Proposed Development Site.</p> <p>It was determined that T25 and T26 could cause interference with the new fixed link (SEI Figure 6-3).</p> <p>The micro siting allowance of 100m proposed by the Applicant in the 2022 EIA Volume 1 Chapter 3 Description of Development Section 3.3.14, will allow T26 to be moved the required distance (approx. 2m) from the path of link 106446/1.</p> <p>Due to environmental constraints and the presence of the fixed links, T25 may not be able to be microsited out of the link path within the 100m micro siting allowance which has been requested in the 2022 EIA Volume 1 Chapter 3 Description of Development Section 3.3.14, unless the Vodafone Link is decommissioned.</p> <p>The Applicant is considering mitigation options with the aim to resolve the outstanding objection regarding T25.</p> <p>The Applicant is committed to working collaboratively with BT Group to find a resolution which is acceptable to all parties involved through a suitably worded suspensive planning condition.</p>

Consultee	Post submission Consultation	Response from The Applicant
NATS Safeguarding	<p>Objection to the Proposed Development due to a predicted Impact on Lowther RADAR.</p> <p>En-route operational assessment of RADAR impact indicates that there will be an "Unacceptable" impact on Prestwick Centre.</p> <p>No impact is anticipated on NATS' navigation aids or NATS' radio communications infrastructure.</p>	<p>Discussions are ongoing between the Applicant and NATS with the aim to resolve the outstanding objection and a mitigation agreement for Lowther Radar.</p>
Glasgow Prestwick Airport Limited	<p>Objection to the Proposed Development until all technical and operational aviation safety matters and mitigations are addressed to the satisfaction of the Airport.</p>	<p>Discussions are ongoing between the Applicant and Glasgow Prestwick Airport with the aim to resolve the outstanding objection as discussed in the SEI Planning Statement (2023 Update).</p>
NatureScot	<p>No Objection to the Proposed Development.</p> <p>Recommendations are suggested including:</p> <ul style="list-style-type: none"> • Peatland: Recommend that the Outline Habitat Management Plan is revised with more ambitious targets set. • Birds: Recommend Outline Habitat Management Plan is revised with more ambitious targets set for improving black grouse management. • Bats: Recommend that reduced rotation speed while idling is adopted, as best practice. 	<p>Following the recommendations received from NatureScot, the Applicant seeks to clarify the following:</p> <ul style="list-style-type: none"> • Peatland: Whilst this SEI does not intend to modify the 2022 Outline Habitat Management Plan (OHMP) (Appendix 14-2), Chapter 5 Section 5.3 of this SEI offers details about biodiversity improvements that align with the OHMP's objective to further enrich the biodiversity of the Proposed Development Site. Additionally the Applicant has focused on peatland restoration through the inclusion of Chapter 3: Revised Peat Management Plan (PMP) and Chapter 4: Outline Borrow Pit Restoration Plan (OBPRP) in this SEI. Areas have been identified which will be used for drain blocking to facilitate rewetting (SEI Figure 3-3) whilst new sections of floating track (SEI Figure 3-1) have reduced the overall impact of the infrastructure, reducing the amount of permanent excavation. • Birds: The Applicant has provided a set of Landscape planting principles and biodiversity enhancements in Chapter 5 which expand on the 2022 EIA OHMP (Technical Appendix 14-2). Landscape Objective A (Section 5.2.1, Chapter 5) and Section 5.3.1 outline the way in which black grouse habitat will be improved in order to encourage the growth of the population. • Bats: The Applicant agrees that reduced rotation speed while idling

Consultee	Post submission Consultation	Response from The Applicant
RSPB Scotland	<p>No objection to the Proposed Development however clarification sought by the consultee regarding the assessment of status of Black Grouse (coverage and length of surveys leading to underestimation) and potential displacement due to infrastructure layout and locations of turbines 29 and 30 which are located closest to lek sites.</p> <p>RSPB recommendations included:</p> <ul style="list-style-type: none"> • Micro-siting of turbines to prevent displacement being at least 500m from lek sites; • Species management plan for Black grouse requested as a condition of planning consent; • Revision of OHMP to include more ambitious habitat restoration and in part targeted at Black Grouse; • Requested to be given seat on Habitat Management Group if consent is granted; and • Post construction monitoring recommended as a condition for consent. 	<p>will be adopted.</p> <p>Following the recommendations received from RSPB, the Applicant seeks to clarify the following:</p> <ul style="list-style-type: none"> • In Volume 1 Chapter 7 Ornithology Section 7.4.2 of the 2022 EIA the Applicant has committed to weekly monitoring to search for leks between mid March – mid May to establish lek locations. Additionally, the Applicant will apply a buffer of 500-750m as appropriate whilst avoiding activity around identified lek sites before 9am between April and May. • Although this SEI does not seek to revise the 2022 OHMP (Appendix 14-2), Chapter 5 Section 5.3 of this SEI provides information on biodiversity enhancements which in line with the OHMP aim to further enhance the biodiversity of the Proposed Development Site. • The Applicant is open to further discussion regarding post construction monitoring and the opportunity for participation in the Habitat Management Group.

6.4 Conclusion

Following the receipt of consultation responses to the 2022 EIA and further engagement with consultees the Applicant has provided further clarification of SEI and non-SEI matters.

The Applicant has carefully considered the responses from consultees and has responded in a manner which will balance commercial pressures, maximise the efficiency and output of the Proposed Development and minimise the potential for environmental impacts.

