

Orkney Islands Council Response:

SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Approximately 50km East of Wick

Orkney Islands Regional Marine Plan (OIRMP)

It should be noted that Orkney Islands Council (OIC) has prepared the Orkney Islands Regional Marine Plan (OIRMP). Subject to approval by Scottish Ministers, the OIRMP is scheduled to be adopted in 2025. When the Stromar Offshore Wind Farm development proposal is submitted and determined for the various statutory consents, the OIRMP may be adopted.

Fish and shellfish

The Figure 10.10: Other Human Activities for Consideration within the CIA for Fish and Shellfish Ecology, includes two tidal/wave sites that are not currently in operation/proposed north of Burray. There is also a new site in place east of Deerness called Mocean Energy.

Commercial Fisheries

The EIA should include sufficient information to avoid, minimise or appropriately mitigate, significant adverse impacts:

- due to displacement, including related impacts on the wider marine environment, on fish stocks and the use of fuel by fishing vessels; and
- on the economic, and where appropriate, cultural importance of fishing, in particular to fragile island communities.

We advise that consultation should be undertaken with Orkney Fisheries Association. This should also include the Orkney Regional Inshore Fisheries Group.

Shipping and navigation

The report identifies impacts on port/harbours and nearshore operations, including the impact on reduced access to local ports and harbours from the presence of the project and operations associated with it. This should identify potential for significant impacts on the operation of Orkney Harbour Areas, particularly impacts relating to the deployment of offshore wind turbines to the proposed development site e.g. from Scapa Flow Harbour Area. It is noted that a preferred port has not been selected for construction and decommissioning and the details for wet storage are currently unknown. That said, the EIA should still include an assessment of impacts on potential ports/Harbour Area operations.

This should also identify the assessment of potential impacts on lifeline ferry services particularly in relation to wind turbine deployment during the construction phase and cabling laying. Stakeholders identified should include Northlink Ferries and Pentland Ferries.

Aviation

Consideration should also be given to any potential impacts on aviation in relation to Kirkwall airport.

Socio-economics, tourism and recreation

The socio-economic study area defined in 18.2.2 does not have a specific geography. It states that the study area will be selected in accordance with these principles:

- *‘Principle 1 (Dual Geographies): The local area for the supply chain and investment impacts should be separate from the local area(s) for wider socio-economic impacts, including tourism and recreation;*
- *Principle 2 (Appropriate Impacts): The appropriate impacts for assessments should be identified before defining the local areas;*
- *Principle 3 (Epicentres): The local areas should include all the epicentres of the appropriate impacts;*
- *Principle 4 (Accountability): The local areas used in the assessment should comprise preexisting economic or political geographies (community councils, local authorities, development agencies) to enhance accountability;*
- *Principle 5 (Understandable): The local areas should be defined so that they are understandable to the communities they describe; and*
- *Principle 6 (Connected Geography): The local area for the supply chain and investment impacts should consist of connected (including coastal) pre-existing economic or political geographies.*

The epicentres of impact associated with the offshore elements of the Project will include the locations of the key construction and O&M ports, the location of any supply chain hubs or any locations on land with visibility of the offshore infrastructure. However, the Array Area will be located approximately 50 km east of Wick and this is beyond the range of normal visibility (White Consultants, 2020). Therefore, the visibility of the offshore infrastructure is not anticipated to be considered an epicentre of impacts. At this stage the port locations or supply chain hubs have not been defined and therefore a ‘local area’ for the combined elements of the Project, including offshore, has not been defined in this Scoping Report. A ‘local area’ for the socio-economic impact assessment will be defined within the EIAR if more details on the potential port locations are known’.

At 18.2.4 and 18.2.5 the Scoping Report specifies Aberdeenshire as the ‘local area’ for onshore impacts, and states that:

“port locations or supply chain hubs have not been defined and therefore a ‘local area’ for the combined elements of the Project, including offshore, has not been defined in this Scoping Report. A ‘local area’ for the socio-economic impact assessment will be defined within the EIAR if more details on the potential port locations are known.”

We consider this approach deficient, as onshore impacts from port and supply chain activity could be more impactful than the activities identified to take place in Aberdeenshire (substation and cable landing). If port locations are unknown, then the EIAR should consider and assess various probable scenarios.

If it is reasonably foreseeable that Orkney ports and supply chain companies could be used and/or have a material role during the construction, operation and/or decommissioning phases of the proposed development, it is requested that Orkney be identified as a local socio-economic study area in the EIAR and that an assessment of associated socio-economic impacts be carried out. It is important to address Orkney as a specific area in its own right. This is because as an Island Archipelago, Orkney has a unique socio-economic footprint and profile

which is distinct to that of Mainland Scotland. This should include an assessment of potential effects on the Orkney economy, demographics, local housing market, labour market and local services i.e. changes in demand for housing and local services resulting from the proposed development. Identified impacts should include direct employment impacts and displacement effects on the local workforce and supply chain e.g. workers from other sectors moving to offshore wind related employment or local suppliers (e.g. freight) not being able to service existing sectors/customers. This should consider both the impacts and opportunities arising from the development. In this regard, Orkney has distinct characteristics in terms of the high level of SME business base and a significant number of businesses operating in marine and environmental sectors. The development therefore has the potential to have significant positive impacts on the Orkney economy which could be proportionately greater than in other parts of the country which should be fully considered through the EIA.

We also note that the TRSA (set out at Figure 18.1) does not include Orkney. Orkney is the closest landfall to the project, and it is reasonable to assume that port and marine activities may impact tourism. We request that Orkney is considered within the TRSA as a separate area.

Table 18.1: Key Sources of Socio-economics, Tourism and Recreation Data should include the following sources if any Orkney port is considered as a local study area:

- Orkney Area Profile : <https://www.hie.co.uk/media/10595/orkney-area-profile-2020.pdf>
- Orkney Economic review:<https://www.orkney.gov.uk/our-services/enterprise-and-economic-growth/orkney-economy/>
- Information on the Orkney Supply Chain can be found at <https://www.orkney.com/life/energy/supply-chain>
[Membership Directory – Orkney Renewable Energy Forum \(OREF\)](#)

Community benefit and associated implications for the EIA socio-economic impact assessment

Orkney Islands Council has established a policy position on community benefit from offshore renewable energy projects ([here](#)), and the Scottish Government is working towards producing new guidelines on community benefit from Offshore wind, and is expecting to publish these next year. Whilst recognising that community benefit packages are additional voluntary measures which are provided by a developer outside of the planning and licensing processes (as detailed in the relevant Scottish Government [guidance](#)), it is recommended that the project developer should give due consideration to the relevant guidance and any associated implications for the EIA socio-economic impact assessment.

Wet Storage

Section 3.7.10 refers to the potential for wet storage of substructures prior to and during integration with the WTGs. Specific requirements and potential wet storage locations are not detailed within the Scoping Report. See comments above re socio-economic study area.

SLVIA

An SLVIA should be undertaken as part of the EIA process for this proposed development. OIC agree with the four viewpoints included in the Scoping report in Table 1 that are present on the Orkney Islands and also welcome the viewpoint on the Aberdeen-Kirkwall Ferry route. We recommend adding a viewpoint at Brough of Deerness, Chapel and Settlement Scheduled

Monument (SM4654). The area offers a popular coastal circuit walk, with the highlight being the path leading out onto the Brough of Deerness.

Table 1- The SLVIA viewpoints relevant to Orkney:

No.	Viewpoint	Easting	Northing	Reason for Selection
1	A960 at Taracliff Bay Orkney Mainland	354970	1003399	Represents views experienced by road users on the A960, and recreational receptors visiting Taracliff Bay.
2	A961 between South Ronaldsay and Burray	348022	995436	Represents views experienced by road users on the A961.
3	Kirkhouse Point, South Ronaldsay	347069	990773	Represents views experienced by recreational receptors along the coast, and residential receptors within South Ronaldsay.
4	Brough Ness, South Ronaldsay	344638	982914	Represents views experienced by recreational receptors along the coast. Similar views will be experienced by transport receptors on the John o' Groats to Burwick ferry.
13	Aberdeen – Kirkwall Ferry	390448	926800	Represents views experienced by travellers on the ferry between Aberdeen and Kirkwall. Views will be experienced towards both the Array Area and the assumed RCS location at similar distances.

We also agree with the landscape/seascape impacts that have been scoped in that are relevant to the Orkney Islands seascape and landscape. These include direct impacts associated with the proposed Stromar offshore wind farm development and the cumulative impacts associated with the Ayre Wind Farm that together will be significantly visible from the east and southeast coast of Orkney Mainland, Shapinsay, Stronsay and the Connected South Isles. Table 2 has been compiled from Table 17.5 in the Scoping Report to identify receptors relevant to the Orkney Islands landscape and seascape. Additional receptors have been added (see text underlined in Table 2) to include recreational beaches at Dingieshowe and Newark Bay (Orkney Mainland), and effects experienced by recreational users on the coastal core path on South Ronaldsay (SR6).

Table 2-Impacts identified in the Stromar Scoping report that are relevant to the Orkney Islands

Impact Pathway	Scoped In/Scoped out	Proportionate EIA
Project Alone Impacts		
Impact (daytime) of the construction, operation and decommissioning of the Array Area on seascape (coastal) character.	Scoped In and Scoped Out	<p>LSE without secondary commitment measures for the following receptors:</p> <p>RCCA 20: Deerness, East End of Holm and Rose Nest; RCCA 39: Burray Ness to Halcro Head; RCCA 40: Brough Ness and Barth Head;</p> <p>Possible LSE without secondary commitment measures, however, it may become clear post-Scoping stage that the impact does not require detailed assessment in the EIAR for the following receptors:</p> <p>RCCA 4: Stronsay; RCCA 21: Holm Sound.</p> <p>No LSE identified at Scoping for the following receptors: RCCA 14: Shapinsay West; RCCA 15: Shapinsay East; RCCA 18: Shapinsay Sound and Inganess Bay; RCCA 19: Deer Sound; RCCA 22: Scapa Bay; RCCA 23: Orphir; RCCA 31: Cava, Rysa Little and Fara; RCCA 32: South East Hoy; RCCA 33: Flotta; RCCA 34: North Bay, Longhope and Switha; RCCA 35: South Walls and Brims Ness; RCCA 38: West Burray and South Ronaldsay.</p>
Impact (daytime) of the construction, operation and decommissioning of the Array Area on perceived landscape character	Scoped In and Scoped Out	<p>LSE without secondary commitment measures for the following receptors:</p> <p>LCT 295: Holms; LCT 298: Low Island Pastures; LCT 299: Undulating Island Pastures; LCT 307: Cliffs – Orkney.</p> <p>Possible LSE without secondary commitment measures, however, it may become clear post- Scoping stage that the impact does not require detailed assessment in the EIAR for the following receptors:</p> <p>LCT 301: Coastal Basin; LCT 302: Inclined Coastal Pasture; LCT 308: Coast with Sand – Orkney</p>

		<p>No LSE identified at Scoping for the following receptors: LCT 296: Whaleback Islands; LCT 297: Ridgeline Islands; LCT 300: Coastal Plain – Orkney; LCT 305: Enclosed Bays; LCT 306: Coastal Hills and Heath; LCT 310: Loch Basin – Orkney; LCT 311: Low Moorland; LCT 312: Plateau Heath and Pasture; LCT 313: Rolling Hill Fringe; and LCT 314: Moorland Hills – Orkney</p>
<p>Impact (daytime) of the construction, operation and decommissioning of the Array Area on visual receptors/views</p>	<p>Scoped In and Scoped Out</p>	<p>LSE without secondary commitment measures for the following receptors:</p> <p>Effects experienced by visual receptors at identified viewpoints, comprising Viewpoint 3: Kirkhouse Point, South Ronaldsay; Viewpoint 4: Brough Ness, South Ronaldsay.</p> <p>Effects experienced by visual receptors on transport and recreational routes, comprising ferry routes between Aberdeen and Kirkwall.</p> <p>Possible LSE without secondary commitment measures, however, it may become clear post-Scoping stage that the impact does not require detailed assessment in the EIAR for the following receptors:</p> <p>Effects experienced by visual receptors at identified viewpoints comprising Viewpoint 1: A960 at Taracliffe Bay, Orkney Mainland; Viewpoint 2: A961 between South Ronaldsay and Burray; Viewpoint 13: Aberdeen – Kirkwall Ferry. Effects experienced by visual receptors on transport and recreational routes, comprising the A960, and A961 roads; and ferry routes from John o’ Groats to Burwick, Gills Bay to St Margarets Hope, and Kirkwall to Lerwick.</p> <p><u>Effects experienced by recreational users on the coastal core path on South Ronaldsay (SR6).</u></p> <p><u>Effects experienced by recreational visitors to beaches, including those engaging in water activities, at Dingieshowe and Newark Bay (Orkney Mainland).</u></p> <p>No LSE identified at Scoping for the following receptors: Visual effects beyond the 60 km study area. Visual effects outwith the ZTV, or within the ZTV where</p>

		surface features including built development and vegetation will limit actual visibility (No LSE).
Impact (night-time) of the operation and maintenance of the Stromar Array Area lighting on visual receptors/views and the visual aspects of coastal character.	Scoped In and Scoped Out	<p>Possible LSE without secondary commitment measures, however, it may become clear post-Scoping stage that the impact does not require detailed assessment in the EIAR for the following receptors: Effects experienced by visual receptors within the ZTV, including at identified viewpoints, public rights of way, long distance recreational routes, transport routes, national cycle network routes, visitor attractions and settlements.</p> <p>No LSE identified at Scoping. No LSE identified at Scoping for the following receptors: Visual effects beyond the 60 km study area (No LSE).</p>
Cumulative Impacts		
Impact (daytime) of the construction, operation and decommissioning of the Array Area on seascape (coastal) character.	Scoped In and Scoped Out	<p>LSE without secondary commitment measures for the following receptors: RCCA 20: Deerness, East End of Holm and Rose Nest; RCCA 39: Burray Ness to Halcro Head; RCCA 40: Brough Ness and Barth Head.</p> <p>Possible LSE without secondary commitment measures, however, it may become clear post-Scoping stage that the impact does not require detailed assessment in the EIAR for the following receptors: RCCA 4: Stronsay; RCCA 21: Holm Sound.</p> <p>No LSE identified at Scoping for the following receptors: RCCA 14: Shapinsay West; RCCA 15: Shapinsay East; RCCA 18: Shapinsay Sound and Inganess Bay; RCCA 19: Deer Sound; RCCA 22: Scapa Bay; RCCA 23: Orphir; RCCA 31: Cava, Rysa Little and Fara; RCCA 32: South East Hoy; RCCA 33: Flotta; RCCA 34: North Bay, Longhope and Switha; RCCA 35: South Walls and Brims Ness; RCCA 38: West Burray and South Ronaldsay.</p>
Impact (daytime) of the construction, operation and decommissioning of the Array Area on perceived landscape character.	Scoped In and Scoped Out	LSE without secondary commitment measures for the following receptors: LCT 295: Holms; LCT 298: Low Island Pastures; LCT 299: Undulating Island Pastures; LCT 307: Cliffs – Orkney.

		<p>Possible LSE without secondary commitment measures, however, it may become clear post-Scoping stage that the impact does not require detailed assessment in the EIAR for the following receptors: LCT 301: Coastal Basin; LCT 302: Inclined Coastal Pasture; LCT 308: Coast with Sand – Orkney.</p> <p>No LSE identified at Scoping for the following receptors: LCT 296: Whaleback Islands; LCT 297: Ridgeline Islands; LCT 300: Coastal Plain – Orkney; LCT 305: LCT 306: Coastal Hills and Heath; LCT 310: Loch Basin – Orkney; Enclosed Bays; LCT 311: Low Moorland; LCT 312: Plateau Heath and Pasture; LCT 313: Rolling Hill Fringe; and LCT 314: Moorland Hills – Orkney.</p>
<p>Impact (daytime) of the construction, operation and decommissioning of the Array Area on visual receptors/views.</p>	<p>Scoped In and Scoped Out</p>	<p>LSE without secondary commitment measures for the following receptors:</p> <p>Effects experienced by visual receptors at identified viewpoints, comprising Viewpoint 3: Kirkhouse Point, South Ronaldsay; Viewpoint 4: Brough Ness, South Ronaldsay.</p> <p>Effects experienced by visual receptors on transport and recreational routes, comprising ferry routes between Aberdeen and Kirkwall.</p> <p>Possible LSE without secondary commitment measures, however, it may become clear post-Scoping stage that the impact does not require detailed assessment in the EIAR for the following receptors:</p> <p>Effects experienced by visual receptors at identified viewpoints comprising Viewpoint 1: A960 at Taracliffe Bay, Orkney Mainland; Viewpoint 2: A961 between South Ronaldsay and Burray; Viewpoint 13: Aberdeen – Kirkwall Ferry.</p> <p><u>Effects experienced by recreational visitors, at Dingieshowe and Newark Bay (Orkney Mainland).</u></p> <p><u>Effects experienced by recreational users on the coastal core path on South Ronaldsay (SR6).</u></p>

		<p>Effects experienced by visual receptors on transport and recreational routes, comprising the A960, and A961 roads; national cycle routes between Burwick to Kirkwall and Stromness; and ferry routes from John o' Groats to Burwick, Gills Bay to St Margarets Hope, and Kirkwall to Lerwick.</p> <p>No LSE identified at Scoping for the following receptors: Visual effects outwith the ZTV, or within the ZTV where surface features including built development and vegetation will limit actual visibility (No LSE).</p>
<p>Impact (night-time) of the operation and maintenance of the Stromar Array Area lighting on visual receptors/views and the visual aspects of coastal character.</p>	<p>Scoped In and Scoped Out</p>	<p>Possible LSE without secondary commitment measures, however, it may become clear post-Scoping stage that the impact does not require detailed assessment in the EIAR for the following receptors:</p> <p>Effects experienced by visual receptors within the ZTV, including at identified viewpoints, public rights of way, long distance recreational routes, transport routes, national cycle network routes, visitor attractions and settlements.</p> <p>No LSE identified at Scoping for the following receptors:</p> <p>Visual effects beyond the 60 km study area</p>

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT – Orkney Island Council
Response**

To include Scapa Flow SPA and the North Orkney SPA in the HRA as they were omitted from the screening report.