



Neven Point Wind Farm

Supplementary Information Report

Neven Point Wind Limited

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Table of Contents

Acronyms and Abbreviations	iii
1.0 Introduction	1
2.0 Further Recommendations as Identified by the Planning Review of the EIA Report	3
3.0 OIC Islands Archaeologist Response	1
4.0 Other Noise Matters Raised by OIC	6
5.0 Noise Assessment for BESS	8
6.0 Revised Peregrine Population Modelling	9
7.0 Aviation	9
8.0 Bat Surveys and Preliminary Roost Assessment 2025 Results	9
9.0 Indicative Grid Connection Corridor Assessment	10
10.0 Access Upgrade Works Assessment	10

Appendices

Appendix A	Wind Turbine Power Level Datasheet (extract)
Appendix B	Noise Assessment for BESS
Appendix C	Revised Peregrine Population Modelling
Appendix D	IFP Assessment
Appendix E	Microlight Use Appraisal
Appendix F	Bat Report
Appendix G	Indicative Grid Connection Corridor
Appendix H	Access Upgrade Works Assessment



Acronyms and Abbreviations

BESS	Battery Energy Storage System
CEMP	Construction Environment Management Plan
DMP	Dust Management Plan
EH	Environmental Health
EIA	Environmental Impact Assessment
HES	Historic Environment Scotland
HIAL	Highlands and Islands Airports Limited
IFP	Instrument Flight Procedures
HV	High Voltage
LGV	Light Goods Vehicle
NBW	Night-time Bat Walkover
OIC	Orkney Islands Council



1.0 Introduction

On 23 June 2025, Neven Point Wind Ltd (the ‘Applicant’) submitted a planning application under the Town and Country Planning Act (Scotland) 1997 (as amended) to construct and operate five wind turbines and a Battery Energy Storage System (BESS) facility on the south of Eday, Orkney (the ‘Proposed Development’). The planning authority, Orkney Islands Council (OIC), has carried out a review of the Environmental Impact Assessment (EIA) Report.

Following its review, OIC has provided consultation comments set out in a letter (25-203-TPMAJ- Further Information Request), dated 5 March 2026.

OIC indicates that there are aspects of the EIA Report that require greater clarification to enable the EIA Report to be ‘*understood more easily by consultation bodies and members of the public and to more robustly address the requirements of the 2017 EIA Regulations*’.

Further information and clarifications have therefore been requested in order to ensure the Town & Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (‘the EIA Regulations’), are fully met.

This Supplementary Information Report (SIR) has been produced to provide the above clarifications and additional information to OIC.

Following review of the comments received from OIC, the Applicant has provided clarifications and additional information, to enable the EIA Report to be more easily understood by consultation bodies and members of the public. Responses are provided to the following:

- recommendations for clarifications and further information as identified by the March 2026 OIC planning review of the EIA Report (refer to **Section 2.0**);
- OIC Islands Archaeologist response dated September 2025 (refer to **Section 3.0**); and
- OIC Environmental Health (EH) response dated October 2025 (refer to **Section 4.0**).

Additionally, the planning authority is seeking further supplementary information to ensure the EIA Report is fully in accordance with the requirements of the EIA Regulations.

The Applicant has provided supplementary information pursuant to Regulation 26 of the EIA Regulations. This includes:

- Completion of a Noise Assessment for the BESS element of the Proposed Development (refer to **Section 5.0**);
- Revised Peregrine Population Modelling which utilises an avoidance rate of 98%, and clarification on estimated collision rates (refer to **Section 6.0**);
- An Aviation Instrument Flight Procedure (IFP) Assessment of the Proposed Development (refer to **Section 7.0**); and
- Provision of the results of bat surveys and Preliminary Roost Assessment at Greentoft Farm undertaken in 2025 (refer to **Section 8.0**).

The Applicant has also provided a proportionate assessment of the indicative grid connection corridor required for the Proposed Development (refer to **Section 9.0**). In addition, a proportionate assessment has been carried out for the potential road upgrade works along Veness Road (refer to **Section 10.0**). Although these works do not form part of the Proposed Development for which planning permission is sought, the potential for likely significant environmental effects, including in-combination effects with the Proposed



Development and other Project components, has been assessed, should either be considered as forming part of the overall Project.



2.0 Further Recommendations as Identified by the Planning Review of the EIA Report

OIC requested clarification on a number of matters relating to the EIA Report. The Applicant has provided responses to these points, including minor corrections and additional information where requested, to support the ongoing review of the application.

In providing these minor corrections and clarifications, the Applicant maintains that the EIA Report submitted with the application presented a thorough baseline, appropriate scoping, proportionate asset coverage and a detailed methodology and assessment aligned with policy and best practice guidelines.



Table 2.1 Applicant Responses to Recommendations

OIC Recommendation	Response
1. Chapter 3 of the EIA Report: Proposed Development should fully clarify the operation and maintenance requirements of the EIA Report.	The operational life of the Proposed Development will be up to 40 years. The Proposed Development will be maintained throughout its operational life by a service team. The service team will comprise operation management, operations technicians and support functions undertaking scheduled and unscheduled maintenance throughout the year. Traffic associated with the operational phase is likely to be around four Light Goods Vehicles (LGV) movements per week, as stated in Appendix 11.1 of the EIA Report. This team will either be employed directly by the Applicant, by the turbine manufacturer or contracted through an engineering consultancy. Management of the wind farm would typically include turbine maintenance, health and safety inspections and civil maintenance of tracks, drainage and buildings. Turbine and BESS maintenance includes the following: • Civil maintenance of tracks and drainage; • Scheduled routine maintenance and servicing; • Unplanned maintenance or call outs; • High Voltage (HV) and electrical maintenance; and • Blade inspections. In the unlikely event that a major turbine component requires replacement, vehicles will use the new access tracks and crane pads, which will be retained during the operational phase to allow access. Health and safety will be controlled as set out in the construction phase.
2. Each technical assessment within the EIA Report should include consideration of the future baseline, i.e. the likely evolution of the baseline in the event that the Proposed Development does not proceed.	Within the EIA Report, the assessment of effects for each environmental topic takes into account the environmental impacts of the construction, operational and decommissioning phases of the Proposed Development; and how the environmental baseline would be expected to evolve in the absence of the Proposed Development (the do-nothing scenario).



OIC Recommendation	Response
3. The baseline section of Chapter 9: Cultural Heritage should be updated to reflect comments from the Islands Archaeologist.	The subheading for medieval period should be corrected to read 'Medieval (AD 400 – 1500)' (rather than 'Medieval AD 410 – AD 1600') in accordance with the Scottish Archaeological Research Framework (ScARF): Panel Reports Chronology¹. The walkover survey did not identify Assets 45-47, with ground conditions at the time of the survey reported in the EIA Report to comprise tall vegetation, which may have in part obscured the remains. It is noted that these assets were directly observed 32 years ago (Asset 45²), 56 years ago (Asset 46³) and 44 years ago (Asset 47⁴) and thus their current condition and level of survival above ground is unknown. However, it is agreed that these assets should be assumed to exist until proven otherwise. As shown on Figure 9.8 of the EIA Report the Proposed Development was designed to avoid the previously recorded locations of these assets. Furthermore, as indicated in Table 9.1 of the EIA Report, the possibility that the extent of Asset 45 is larger than its previously recorded point has been acknowledged and mitigation has been proposed. The assumption that Assets 45-47 exist therefore does not change the conclusions of the EIA Report. Mitigation for these assets is detailed in the response to Recommendation 11.
4. Details of the manufacturer and model of sound level meter and microphone used for the background noise measurements should be provided within the Noise reporting along with calibration certificates.	The calibration certificates of the sound level meters and microphones used for the baseline noise survey are provided in the EIA Report at Appendix 10.3 Calibration Certificates. As set out within that appendix, the Rion NL-52 sound level meters fitted with Rion UC-59 microphones were used. The calibration details and equipment serial numbers are presented at Table 10.7 of the Chapter 10: Noise of the EIA Report. As described at paragraph 2.2 of EIA Report Appendix 10.2 Baseline Noise Measurement Details &

¹ ScARF 2012. Panel Reports Chronology and Downloads. Available online at: <https://scarf.scot/national/panel-report-chronology-and-downloads/> (Accessed 22/04/2026)

² Trove, 1994. Eday, War Ness. <https://www.trove.scot/place/3121#details> (Accessed 24/04/2026)

³ Trove, 1970. Eday, War Ness. <https://www.trove.scot/place/3123#details> (Accessed 24/04/2026)

⁴ Trove, 1982. Eday, War Ness. <https://www.trove.scot/place/3124#details> (Accessed 24/04/2026)



OIC Recommendation	Response
	Cumulative Assessment Methodology, the microphones were fitted with double skin wind shields that meet the requirements of the IOA GPG ⁵ .
5. Chapter 9: Cultural Heritage should be updated to provide an assessment of the potential effects on assets 45-47 during the construction phase of the Proposed Development.	See response to Recommendation 3.
6. Chapter 9: Cultural Heritage should clarify and update the cumulative assessment.	In line with guidance on Assessing the Cumulative Impact of Onshore Wind Energy Developments, and in accordance with the significance-led approach required under NPF4 Policy 7 (a), the assessment of cumulative effects presented in Chapter 9 of the EIA Report focussed on whether there would be any likely significant cumulative effects rather than an assessment of every potential cumulative effect. It is noted that Figure 6.2 of the EIA Report (rather than Figure 3.2 as incorrectly stated in EIA Report paragraph 9.5.31) illustrates the operational, consented, and proposed schemes, including those at scoping. The approach to cumulative assessment is set out in EIA Report paragraphs 9.5.28-9.5.31, summarised in EIA Report Section 9.11, and presented in detail in EIA Report Appendix 9.4. Operational wind farms are considered as the baseline and therefore the cumulative assessment considered impacts related to other proposals in the study area focussing on in-application and consented developments and in particular Faray, the closest cumulative development to the Proposed Development, which is shown on a cumulative ZTV in EIA Report Figure 6.12. The consented developments at Costa Head, Hammars Hill Extension and Quanterness are all located on Orkney Mainland at least 18 km from the Proposed Development and thus it was not considered necessary or useful to produce a cumulative ZTV for these developments. The only in planning development, Nisthill Wind Farm, is situated approximately 25 km to the west of the Site and not expected to result in any potential significant cumulative heritage effects.

⁵ Institute of Acoustics, A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Noise from Wind Turbines, May 2013



OIC Recommendation	Response
	The assessment of cumulative effects presented in EIA Report Appendix 9.4 cross references cumulative development and visualisations as appropriate and considers the additive effect of cumulative developments in combination with the Proposed Development. Where the greater weight of the impact on the setting of the assets is considered to be from the Proposed Development this is noted in EIA Report Table 9.4.2. However, the effects identified in EIA Report Appendix 9.4 are cumulative effects and not operational effects and thus are distinguished from, and additional to, those from the Proposed Development alone. It is maintained that the cumulative assessment as presented in EIA Report Appendix 9.4 is proportionate and focussed on potential for significant effects.
7. Confirmation should be provided that the cumulative schemes for assessment in the EIA Report have been agreed with the planning authority.	Chapter 6 of the EIA Report, paragraph 6.5.18, notes the scope of the cumulative assessment having been agreed with OIC. There is no specific requirement or guidance requiring explicit agreement with the planning authority which cumulative schemes should be assessed. Relevant good practice guidance on cumulative assessment has been followed and reported in the EIA Report.
8. All technical chapters within the EIA Report should clarify any difficulties encountered compiling the required information.	Where there are material limitations to the technical assessments, the technical chapter within the EIA Report details these within the Assessment Methodology and Significance Criteria section of the chapter. EIA Report Chapter 7 Ecology details limitations in Section 7.8: Data gaps and uncertainties. EIA Report Chapter 14 Socio-economics, Tourism and Recreation details limitations in Section 14.7: Data gaps and uncertainties.
9. Chapter 15: Air Quality should be updated to include the CEMP as embedded mitigation.	The standard mitigation measures that have been incorporated into the design of the Proposed Development and will be included in the Construction Environment Management Plan (CEMP) have been detailed in the chapter as 'standard mitigation'. The way that the procedures are translated into the CEMP are part of the Dust Management Plan (DMP) which will be implemented according to best practice.



OIC Recommendation	Response
10. Chapter 7: Terrestrial and Coastal Ecology should state which mitigation measures are considered as additional for each development phase.	All proposed ecological mitigations (prefix 'TE') can be considered 'additional' mitigation measures. The only embedded mitigation is GM01 (Design Mitigation).
11. Chapter 9: Cultural Heritage should specify any mitigation measures (if required) to address any potential impacts on Assets 45-47 during construction and clarify the requirement for compensatory mitigation to offset the impacts of the Proposed Development on heritage assets during operation.	Assets 45-47 comprise the remains of a possible farmstead (Asset 45), 3-4 possible grave slabs and associated burials (Asset 46) and traces of a former bank or wall associated with a limpet mound (Asset 47). As per para 9.9.2 of the EIA Report, it is proposed to fence off known assets within 50m of proposed working areas and thus the previously recorded locations of these assets would be protected from inadvertent damage during construction. As noted in para 9.9.3 of the EIA Report, a geophysical survey targeting the Proposed Development footprint will be undertaken and will inform the potential micro-siting of infrastructure to avoid sub-surface archaeological remains and/or inform the requirement for a programme of archaeological investigation and recording in advance of construction. The OIC Islands Archaeologist response noted that <i>'the mitigations outlined should address these issues, but it would be better to identify specific mitigations to address these particular assets'</i>. In view of the uncertainty regarding the location, extent, and survival of these assets, the geophysical survey will be extended to include the location of these assets to assist with identification and allow for their asset extents and an appropriate buffer to be more accurately demarcated. If geophysical survey identifies anomalies of archaeological interest extending into the area proposed for groundworks for T1, an archaeological evaluation through a programme of trial trenching will be undertaken to target these anomalies. A watching brief will then be maintained on all remaining ground-breaking works associated with T1 to assess the potential for hitherto unrecorded buried archaeological remains to survive within the Site. Compensatory mitigation is outlined in Section 9.9: Additional Mitigation and Enhancement, specifically within paragraphs 9.9.8 and 9.9.9 of the submitted EIA Report. It is acknowledged that these paragraphs are under the subheading <i>'public benefit'</i> rather than under a specific <i>'compensatory mitigation'</i> subheading, nevertheless there is clear reference to a livestock management plan to both reduce damage and prevent access to the



OIC Recommendation	Response
	Scheduled Greentoft burnt mound (SM1287; Asset 34) and to upgrade works along the existing War Ness path and a heritage trail within the Site to improve accessibility and understanding of the known heritage resource. It is thus maintained that the EIA Report clearly identified the requirement for compensatory mitigation and that the mitigation proposed to offset operational impacts is proportionate and meaningful and should be considered in the planning balance.
12. The NTS should be reviewed and updated to reflect any updates to the EIA Report.	No updated Non-Technical Summary is proposed given that the information provided in this response to OIC's consultation comprises clarification and reiteration of information presented in the EIA Report. A Non-Technical Summary has been produced to support this SIR which summarises the additional environmental information provided but does not repeat the content of the submitted EIA Report where that content is unchanged.
13. The reference lists within the EIAR should be reviewed and updated to amend any inconsistencies.	Clarification and correct references are provided here. The correct reference in Chapter 5 of the EIA Report for the NPF is: <i>Scottish Government. (2023) National Planning Framework 4.</i> It is noted that the OIC Supplementary Planning Guidance: The Heart of Neolithic Orkney World Heritage Site (OIC 2010) was replaced in 2017 by Planning Policy Advice: Historic Environment (Topics and Themes) Section 3: Heart of Neolithic Orkney World Heritage Site Planning Policy. References to this document in Chapter 9, para 9.3.8 and 9.3.11 of the EIA Report should be replaced with the following: <i>Orkney Islands Council. (2017) Planning Policy Advice: Historic Environment (Topics and Themes) Section 3: Heart of Neolithic Orkney World Heritage Site Planning Policy.</i> Updated reference lists are not proposed as the corrections and clarifications made here are not considered to change the overall assessment of effects.



3.0 OIC Islands Archaeologist Response

Following review of consultation responses received from the OIC Islands Archaeologist, that there are some matters with regard to cultural heritage that require minor corrections and greater clarification. Where applicable, the comments from the OIC Islands Archaeologist have been addressed in **Section 2.0** above and thus are not considered further here. The majority of the remaining comments are advisory and relate to matters of scope, clarity, and presentation.

Development Boundary

The comment that future development within the Development Boundary would require a separate application is noted and agreed.

Guidance

It is noted that the OIC Supplementary Planning Guidance: The Heart of Neolithic Orkney World Heritage Site (OIC 2010) was replaced in 2017 by Planning Policy Advice: Historic Environment (Topics and Themes) Section 3: Heart of Neolithic Orkney World Heritage Site Planning Policy and that references to this document in Chapter 9, para 9.3.8 and 9.3.11 should be replaced with references to the 2017 guidance. As noted in **Section 2.0** of this report, this change does not affect the assessment of effects as presented in the EIA Report.

Assessment Methodology and Significance

The OIC Islands Archaeologist response notes that the criteria used for assessing sensitivity of heritage assets and for establishing an asset's relative sensitivity to changes to its setting are acceptable. However, queries are raised regarding the criteria used for classifying magnitude of impact as expressed in EIA Report Chapter 9, Table 9.4. The OIC Islands Archaeologist identifies what they consider to be a disparity between the levels of Medium and High effects and observes that a Medium impact would comprise no erosion of key characteristics but that there would be some loss of cultural significance and that only a High Impact would result in any loss of key characteristics.

It is maintained that the methodology used for assessing impact magnitude is clear and appropriate. The methodology used throughout the assessment has been formulated with specific reference to terms used in guidance and loss of 'key characteristics' is considered different to loss of 'cultural significance.' The methodology allows for some cultural significance of an asset to be lost without losing a key characteristic (i.e., not all cultural significance is directly tied to key characteristics of an asset).

The matrix set out in the assessment in EIA Report Chapter 9, Table 9.4 is based on clear sensitivity and magnitude of impact criteria, which in accordance with the EIA Handbook⁶ clearly articulate the relationship between cultural significance (value) and potential loss of cultural significance (based on magnitude of impact) and the overall significance matrix accurately reflects significance of effect based on potential reduction to cultural significance.

Mitigation

The OIC Islands Archaeologist notes that the standard mitigations of avoidance, recording and offsetting are acceptable. It is further noted that more detail will be required when mitigations are applied. This is acknowledged and agreed as per the concluding sentence of

⁶ SNH and HES (2018). Environmental Impact Assessment Handbook. Version 5. Scottish Natural Heritage. Available at: <https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0> (Accessed 24/04/2026)



EIA Report Chapter 9, paragraph 9.9.4 which states: '*Details of mitigation will be agreed with OIC in consultation with the OIC Archaeologist through a Written Scheme of Investigation (WSI).*'

Construction effects

The OIC Islands Archaeologist notes that the Proposed Development has been designed to avoid or minimise direct impacts on known heritage assets, where possible, and agrees that the temporary effects on setting during the construction phase can be scoped out of detailed assessment.

Comments with regard to Assets 45-47 have been addressed in **Section 2.0** of this report.

Operational effects

The OIC Islands Archaeologist's response provides commentary on the assessment of operational effects on the following assets as presented in the EIA Report Chapter 9 and in Appendix 9.3:

- Greentoft Burnt Mound (SM1287; Asset 34);
- Southside Standing Stone (SM1381; Asset 10);
- Vinquoy Cairn (SM1410; Asset 32) and various mortuary sites;
- Stackelbrae Castle (SM5944; Asset 22);
- St Magnus Church, Egilsay (SM90137; Asset 24); and
- Ward Hill (Non-designated assets 257 and 258).

For assets discussed in EIA Report Appendix 9.3, the OIC Islands Archaeologist states that an assessment as to whether integrity is affected is needed to be able to relate the effects to NPF4 Policy 7h)ii. However, EIA Report Appendix 9.3 includes an assessment of those assets that were judged to not be subject to significant EIA effects. As per Chapter 9, para 9.5.22 of the EIA Report, it is considered that where no EIA significant effect is found there would be no significant impact upon the integrity of an asset's setting. This is because for many assets, setting may make a limited contribution to their significance and as such changes would not significantly impact the integrity of their settings. Additionally, as set out in EIA Report Table 9.3, lower ratings of magnitude of change relate to changes that would not obscure or erode key characteristics of setting. Therefore, it is maintained that a separate statement on integrity of setting is not required for assets assessed in EIA Report Appendix 9.3.

Greentoft Burnt Mound (SM1287; Asset 34)

As noted by the OIC Islands Archaeologist, the analysis of the setting of the Scheduled Greentoft Burnt Mound presented in the EIA Report states that "*the sole intervisible prehistoric asset comprises the Southside standing stone (Asset 10; 950 m to the north-east) and that there is no substantial evidence to suggest this is a significant visual relationship.*"

The OIC Islands Archaeologist observes that '*there is no substantial evidence to suggest this is not a significant relationship either.*' The analysis presented in the EIA Report is based on an assessment of the known and identifiable key characteristics of the monuments in their current settings and it was the reasoned judgement during assessment that there is no significant relationship between the two assets. This is not meant to imply that the visual relationship is non-existent but that, in the context of the Southside Standing Stone which is located adjacent to a former quarry and the fact that burnt mounds are generally sited due to proximity of water resource rather than for a specific view, the balance of evidence indicates that the visual relationship between the two assets is not a key characteristic of the current setting of either monument. The OIC Islands Archaeologist also notes that '*The analysis also*



omits the relationship with the Warness burnt mound only 300m to the south (AOC Asset 41, NRHE 3115)'. As recorded in EIA Report Appendix 9.1, Warness burnt mound is diminished in extent and stands perhaps 0.8-0.9m tall at its tallest point. At a distance of 300m to the south of the Greentoft Burnt Mound with an intervening drystone dyke there is no visibility of Warness Burnt Mound from Greentoft Burnt Mound.

On the basis of the above outlined queries regarding the setting of the Greentoft Burnt Mound, the OIC Islands Archaeologist notes that the conclusion that the Proposed Development would not significantly adversely affect the integrity of the asset's setting '*could be questioned.*'

As Greentoft Burnt Mound is a Scheduled Monument, Historic Environment Scotland (HES) is the statutory consultee with regard to setting integrity and extensive pre-application consultation regarding the setting of Greentoft was undertaken. Concerning the burnt mound, HES concluded in their consultation response dated 12 February 2025 that they were 'content that the impact would not be of a magnitude to warrant our objection' and thus it can be assumed that HES do not consider that the Proposed Development would be in conflict with NPF4 Policy 7h (ii) and thus would not significantly adversely affect the integrity of the asset's setting.

Southside Standing Stone (SM1381; Asset 10)

The OIC Islands Archaeologist identifies a number of issues with the analysis of the stone's setting as presented in the EIA Report and these principally focus on identification of key views and the subsequent identified Medium magnitude of impact, which have led the OIC Islands Archaeologist to state that the conclusion that the Proposed Development would not significantly adversely affect the integrity of the asset's setting '*could be questioned.*'

The Applicant acknowledges that there are open views from the stone to the east, south and to the west to Ward Hill. It is further acknowledged as per the assessment presented in the EIA Report that in conjunction with the quarry to the north of the asset, the Proposed Development would contribute to a sense of enclosure and change the way in which the asset is experienced and indeed a Moderate and EIA significant adverse effect on setting of the asset was identified. However, it is maintained that the key factors of the asset's setting, specifically the intervisibility with Greentoft burnt mound (SM1287; Asset 34) and the views south over the sea, would still be appreciable and the ability to understand, appreciate and experience those elements of setting that contribute to its cultural significance would be adequately retained. Accordingly, there would be no significant impact upon the integrity of the asset's setting in terms of Policy 7 of NPF4.

The setting of Southside Standing Stone was discussed with HES as part of pre-application consultation. HES did not object to the Proposed Development.

Vinquoy Cairn and various mortuary sites

It is noted and acknowledged that EIA Report Chapter 9, para 9.8.20 erroneously refers to the island of '*Farness*'. This is a typographical error and should be corrected to read '*Faray*.'

The assessment of Vinquoy Cairn (SM1410; Asset 32) found that the effect of the Proposed Development would be minor and thus not significant in EIA terms. As per paragraph 9.5.22 of Chapter 9 of the EIA Report, it is considered that where no EIA significant effect is found, there would be no significant impact upon the integrity of an asset's setting and thus there would be no conflict with NPF4 Policy 7h(ii). The addition of a further statement to this effect is not considered necessary.

Extensive pre-application consultation regarding the setting of Vinquoy Cairn was undertaken with HES and they concluded in their advice dated 7th April 2025 that: '*although the proposed development would be visible in important long-ranging views to the south*



from the monument, this impact to the scheduled monument's setting would be below the level that would raise issues of national interest. Therefore, based on the current information we are content that the impact would be unlikely to be of a magnitude that would warrant our objection for this asset.'

Stackelbrae Castle (SM5944; Asset 22)

The OIC Islands Archaeologist considered that the magnitude of setting impact for Stackelbrae (Asset 22) is underestimated and that the use of the intervening Maltbarn buildings (max 5m high) to state that the 180m high to tip turbines would be partially obstructed is not valid. This is not agreed. The Maltbarn buildings would not block views towards the Proposed Development, but they would partially obscure views of the turbines from part of the asset and thus this statement remains valid.

It is also not agreed that the view to the sea is over-emphasised. It is maintained that the coastal location of the asset is key to understanding the contribution that setting makes to the asset's cultural significance.

The Applicant maintains that it is possible for something to be peripheral within an open view; this statement was made within the context of analysis which had identified that the asset would have *'excellent 180-degree seaward views east-south-west'* and the development would be peripheral to that view. The suggestion that the visual link between Greentoft and Stackelbrae castle is not included is contradicted by Plate 2 of EIA Report Appendix 9.3, where the link between Stackelbrae castle and Greentoft farm is identified.

The setting of Stackelbrae Castle was discussed with HES as part of pre-application consultation. HES did not object to the Proposed Development.

St Magnus Church, Egilsay (SM90137; Asset 24)

With regards to the setting of St Magnus Church (referred to as St Magnus Kirk in the OIC response), the OIC Islands Archaeologist criticises the assessment's apparent concentration on views from the kirk and suggests that there is no focus on whether there would be an effect on the dominance of the kirk and its tower from the sea and other islands and also states that wireframes/visualisations have not been provided. However this is not borne out by the analysis presented in EIA Report Appendix 9.3 which states *'its [St Magnus Church's] prominence in the landscape when viewed from elsewhere is considered a significant element of the asset's setting, more so than the views from the asset itself'*. Analysis of long-ranging views towards the Proposed Development featuring St Magnus Church from the nearby islands of Rousay and Wyre has also been undertaken, with cross reference to the visualisation LVIA VP 7d which shows St Magnus Church offset from the Proposed Development which is over 11km from the viewpoint at Faraclett, East Rousay and over 8.5km from St Magnus Church.

Ward Hill (Non-designated assets 257 and 258)

With regard to Ward Hill, the OIC Islands Archaeologist response appears to conflate the assets which sit atop the hill with the landform itself as exemplified by the statement that *'The potential for the turbines to remove the prominence of Ward Hill in the landscape and seascape is not really addressed.'* The prominence of the landform is a landscape and visual issue and not directly related to heritage assessment. The analyses presented in the EIA Report focussed on the extent to which the setting of each asset atop the hill, the cairn (Asset 257) and triangulation pillar (Asset 258), contributed to cultural significance and therefore whether that cultural significance would be lost.

The speculative beacon site, if this is indeed what the ephemeral structural remains underlying the more substantial and modern component of the cairn are (together these comprise Asset 257), is not visible from surrounding areas given its denuded and low-lying



nature. That this structure is a ward/beacon site is speculative, and as EIA Report paras 9.6.14 and 9.6.15 point out, the place-name may relate to the hill itself, and not the structure. The beacon would have comprised a large fire, potentially lit in warning and/or as a signal, visible to the surrounds and potentially others on further islands. The fire element is what would make the assets visible to one another and to the broader surrounds, and as it no longer burns, the strength of this visual relationship is diminished – this specific element of the asset is lost amongst broad heathland in any views towards it from afar. The hillform itself would not be obscured by the turbines, and so the landscape marker continues to serve as an aid to the beacon's broad whereabouts elsewhere in the landscape.

It is however acknowledged that the trig pillar derives some significance from its setting in so far as it was designed to be visible by surveyors from at least two other trig points. However, the Proposed Development would not prevent any such intervisibility and thus no impact on this aspect of the trig pillar's cultural significance is expected.

The Applicant maintains that the assessment of magnitude of impact on the Ward Hill assets as presented within the EIA Report is proportionate and in line with the significance-led approach of NPF4 Policy 7 (a).

Decommissioning

The Applicant agrees that potential for significant decommissioning effects should be mitigated using the same mitigations as for construction, such as avoidance, exclusion zones, and archaeological watching briefs.

Additional Mitigation and Enhancement

For the most part the OIC Islands Archaeologist agrees with the conclusions and proposals of the EIA Report regarding additional mitigation and enhancement. It is advised that appropriate public benefit strategies should be discussed and agreed with the local authority and with Eday residents and that public benefit should be considered separately from offsetting mitigations such as cattle management.

The OIC Islands Archaeologist requests that the statement that archaeological monitoring would result in beneficial effects for as yet unknown remains should be changed to reflect the fact that removal of the assets means that they no longer exist except in record. This is acknowledged and it is agreed that where assets are removed this would not be a beneficial outcome. It is maintained as per 9.10.1 of the EIA Report that archaeological mitigation has been designed to ensure that there would be minimal loss of information content and the residual effects would be negligible adverse and not significant. Mitigation would allow for the detailed recording of any remains encountered during the construction phase and the results would therefore enhance our understanding of the area's cultural heritage. The residual effect recorded in the summary table in relation to direct impacts to known heritage assets and unknown heritage assets should read 'Negligible adverse'.

Summary

The OIC Islands Archaeologist requests that the Executive Summary and the Summary of Effects require revision once corrections and clarifications to the EIA Report have been made.

The corrections and clarifications made here are not considered to change the overall assessment of effects. Clarifications regarding mitigation will be addressed within the suggested planning conditions appended to the OIC Islands Archaeologist response.



4.0 Other Noise Matters Raised by OIC

There are a number of additional matters raised by the Environmental Health (EH) department of OIC which were not included in the OIC formal request for additional information, but a response is provided here for completeness where not covered by the formal request response. The following responses are provided in the order raised in the EH department email dated 10 October 2025.

Blasting Noise

It is acknowledged that no detailed assessment of blasting noise was undertaken as the specific details of blasting required in borrow pits is unknown at this stage. It is agreed that noise from blasting can be covered by a suitably worded planning condition that requires blasting to be assessed and included within the CEMP.

Details of Personnel Undertaking the Assessment

The baseline noise measurement equipment was installed by Mike Craven, BSc, MIOA who was a Principal Consultant at the time of the installation of the equipment. Mr Craven has extensive experience in acoustics and specifically wind turbine acoustics and has been involved in all stages of wind turbine noise assessment including EIA, public inquiry and planning hearings, and complaints and compliance assessment.

The noise impact assessment, including the noise chapter and appendices, was undertaken by Rob Shepherd, MEng, MIOA, whose credentials were set out in Chapter 1, Table 1.1 of the EIA Report.

Planning Conditions

The EH response requests that a condition is attached to the consent that requires the noise impact assessment to be reassessed once the final selection of wind turbine type is selected. It is considered that the application of suitable noise limits within the planning conditions attached to the consent is sufficient to ensure that operational noise levels remain within allowable levels, and that therefore such an additional condition may not be necessary. However, the Applicant could agree to an additional condition that requires an updated assessment to be submitted to OIC following final turbine selection, although the wording would need to be agreed. The planning conditions on noise will include a clause that requires the operator of the site to carry out compliance measurements at the request of OIC following a valid complaint.

Turbine Sound Power Level Data

The sound power level data used in the operational wind turbine noise modelling is set out at Table 10.10 in Chapter 10 of the EIA Report and includes a statement on uncertainty.

A copy of the manufacturer's datasheet that the candidate turbine sound power levels were based on is included at **Appendix A** of this Supplementary Information Report.

Adoption of Daytime Lower Limiting Value

It is noted that the OIC EH department recommend the application of the lower daytime noise limit (i.e. applying a lower limiting value of 35 dB LA90). The rationale for justifying the application of a lower limiting value within the range 35-40 dB LA90 is set out within Chapter 10 of the EIA Report. Ultimately it is a planning consideration as to whether the application of a lower limiting value within the range of 35-40 dB is acceptable. Nevertheless, the EIA Report shows that the lower daytime noise limit can be met.



Construction Noise

A restriction on construction working hours is recommended by OIC EH which is usual practice and working hours will be set out within the CEMP. It is noted that the CEMP will consider noise and will take into account the proposed working methods and plant.

It is noted that OIC EH recommend that construction noise compliance monitoring is carried out during the construction phase. Their expectations in terms of compliance monitoring are not set out, i.e. the number of measurement locations, the frequency, location and duration of measurements. Measurements at locations outside of the control of the Applicant may not be possible.

The predicted construction noise levels are discussed at Chapter 10, paragraphs 10.9.4 to 10.9.7 of the EIA Report which confirms that worst case predicted construction noise levels will meet the relevant construction noise limits, and that for the majority of the time construction noise levels will be significantly below the relevant noise limits at noise sensitive receptors. It is therefore considered unnecessary to carry out routine construction noise monitoring. However, the CEMP will set out how local residents can make a complaint about construction noise, and how these complaints will be addressed, which may include carrying out noise measurements where appropriate.



5.0 Noise Assessment for BESS

OIC has requested completion of a Noise Assessment for the BESS element of the Proposed Development (in line with the methodology set out in BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'). OIC noted that consideration of the cumulative impact of the wind turbines and noise from the BESS facility should also be made as appropriate.

The noise assessment is provided in **Appendix B**, which confirms that it was appropriate to scope out operational noise from the BESS and substation as the predicted noise effects are negligible both in isolation and cumulatively with the rest of the Proposed Development.



6.0 Revised Peregrine Population Modelling

NatureScot's response (dated 12 September 2025) to the Proposed Development requested further information to enable them to carry out an assessment on the appraisal of the impacts on the regional (NHZ2) population of Peregrine.

A revised peregrine NHZ2 population model using an avoidance rate of 98%, and clarification on the estimated collision rates is provided in **Appendix C**.

7.0 Aviation

Instrument Flight Procedure Assessment

Following Highlands and Islands Airports Limited's (HIAL) holding objection, the Applicant has commissioned and submitted to HIAL an Instrument Flight Procedures (IFP) Assessment for Kirkwall Airport, in relation to the Proposed Development. The IFP Assessment is provided in **Appendix D**.

Subsequent to submission of the IFP assessment, HIAL confirmed that the proposed development has the potential to affect the safeguarding criteria associated with Kirkwall Airport. However, an appropriate mitigation solution has since been identified and can be secured by planning condition, as confirmed within HIAL's updated consultation response dated 14 May 2026. Therefore, no further actions are currently required.

Microlight Aircraft

An assessment of potential microlight activity within the surrounding area has not been carried out. It is understood that the field in question is used for private use and does not benefit from planning permission as a microlight airstrip and is therefore limited to a maximum of 28 days' use per calendar year under permitted development rights. Such rights are not unique to this location and could apply elsewhere for a range of temporary uses around the proposed development. As such, this has not been included within the environmental baseline and has not been considered further within the EIA. However, for completeness and in response to a request from the landowner, an appraisal of potential turbulence effects in relation to the understood use of the microlight has been undertaken and is presented for information only. The appraisal is provided in **Appendix E**.

The appraisal should not be interpreted as establishing the microlight use as an environmental baseline receptor for the purposes of the EIA.

8.0 Bat Surveys and Preliminary Roost Assessment 2025 Results

As set out in Chapter 7 of the EIA Report, a preliminary roost assessment (PRA) at Greentoft Farm and bat activity surveys were undertaken during the 2025 bat activity season. The bat report, detailing the results of the PRA and bat activity surveys is provided in **Appendix F**.

Overall, low levels of bat activity were identified in the site. No bats were recorded during the Night-time Bat Walkover (NBW) survey and bat were only detected on two nights out of the 32-night static detector survey period. Due to the lack of bat activity recorded during the NBW surveys, and the timings of the bat records on the statics detectors being outside the usual emergence period for the bat species (*Nathusius' pipistrelle* or common pipistrelle), and based on the data gathered, it is considered that there are likely no bats roosting in the buildings within the Site.



9.0 Indicative Grid Connection Corridor Assessment

Following the Raeshaw Farms Ltd vs Scottish Ministers (2026) CSIH 10 decision, and consistent with current Planning and EIA practice, **Appendix G** provides a proportionate assessment of the indicative grid connection corridor associated with the Proposed Development based on information available at this stage. The assessment reviews the potential for likely significant environmental effects associated with either an underground cable or overhead line connection and concludes that significant effects are unlikely, subject to detailed design, route refinement and standard mitigation measures.

10.0 Access Upgrade Works Assessment

In addition to the Proposed Development, minor road upgrade works along Veness Road have been identified as works that may be required to facilitate abnormal load deliveries for the Proposed Development. An assessment has been undertaken to ensure that their potential environmental effects alone and in combination with the Project, have been appropriately considered. This is provided in **Appendix H**.

