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9 April 2021

Dear Stephen

Further Information Submission on Aviation Lighting

SSE Generation Limited (hereafter referred to as 'the Applicant') has submitted Further Information to support the application to the Scottish Ministers under Section 36C ('the S36C application') of the Electricity Act 1989 ('the 1989 Act'). The S36C application was submitted in August 2020 and proposes the variation of the Section 36 consent granted by the Scottish Ministers on 27 April 2018 under the 1989 Act ('the 2018 Consent'), for the construction and operation of the Strathy South Wind Farm T39 Layout ('the Consented Scheme'). This Further Information submission has been prepared in accordance with the requirements of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended), ('the 2017 EIA Regulations'). The principal variation to the Consented Scheme being the increase to the tip height of the 39 turbines to up to 200 m. Detailed information regarding the proposed variations to the 2018 Consent is presented in Chapter 2: Description of Development of the Strathy South Wind Farm 2020 Section 36C Application EIA Report.

The purpose of this Further Information submission is to present additional Landscape and Visual Assessment in relation to aviation lighting requirements of the Civil Aviation Authority (CAA). The Lighting Assessment currently presented for the Proposed Varied Development is based on the requirements of the CAA Policy Statement¹, in that all 39 turbines would be lit. It was noted at the time of writing the Strathy South Wind Farm 2020 Section 36C Application EIA Report that the Applicant was in discussions with the CAA on a reduced lighting scheme, this Further Information submission presents the updated lighting assessment for the Proposed Varied Development.

¹ Lighting of Onshore Wind Turbine Generators in the United Kingdom with a maximum blade tip height at or in excess of 150 m Above Ground Level

The Applicant now has an agreement with the CAA to mark the north west, north east, south west and south east corners of the wind farm, plus the mid-points of the east and west sides of the development (T2, T15, 26, T35, T52 and T69), which would be fitted with both 2000 candela steady red visible lights (200 candela when visibility is greater than 5km) and infra-red lights on the nacelles. The remaining perimeter turbines would be fitted with infra-red lighting only. Lights at the intermediate level of half the nacelle height would not be fitted. This updated lighting assessment is to reflect the change to the agreed lighting scheme and to address concerns raised by NatureScot on the potential impacts of aviation lighting on East Halladale Flows Wildland Area 39 in their objection to the Proposed Varied Development (November 2020).

NatureScot was consulted ahead of submission and advised that in order to accurately assess the potential impacts they would require the following information²:

- 4 turbine hub height lighting ZTV showing coverage across WLA39;
- Cumulative hub height ZTV with the current proposed Strathy Wood lit turbines to allow us to understand how these proposals might appear together;
- Night time visualisation (Beinn Ratha is acceptable) illustrating the proposed lighting;
- Focussed assessment of the effects of lighting on the relevant wind land qualities.

The Further Information submission and other documents lodged in relation to the S36C application will be available to view on the Scottish Government's portal at www.energyconsents.scot. In accordance with Regulation 4(2)(a) of the 2013 Regulations, application documents, including the EIAR, will also be available to view on an application website: <https://www.sserenewables.com/onshore-wind/in-development/strathy-south>.

The Further Information submission will be advertised in accordance with the relevant legislative requirements under the 2013 Regulations and the 2017 EIA Regulations as follows:

- On the application website;
- The Press and Journal; and
- Edinburgh Gazette.

² Email from Alec MacDonald at NatureScot to Laurie Winter (SSE) dated 24/02/2021. Please note that the turbine hub height lighting ZTV showing coverage across WLA39 has been updated from 4 to 6 in line with the CAA agreement.

Copies of the Further Information submission may be obtained from SSE Generation Limited, for details, including costs, contact: SSE Generation, FAO Laurie Winter, Inveralmond House, 200 Dunkeld Road, PH1 3AQ or laurie.winter@sse.com.

Any representations in respect of the application may be submitted via the Energy Consents Unit (ECU) website at www.energyconsents.scot/Register.aspx; by email to The Scottish Government, Energy Consents Unit mailbox at representations@gov.scot or by post, to The Scottish Government, Energy Consents Unit, 4th Floor, 5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU, identifying the proposal and specifying the grounds of representation.

Written or emailed representations should be dated, clearly stating the name (in block capitals), full return email and postal address of those making representations. Only representations sent by email to representations@gov.scot will receive acknowledgement.

All representations should be received not later than the date falling 30 days from the date of the last published notice. Any subsequent additional information which is submitted by the Applicant will be subject to further public notice in this manner, and representations to such information will be accepted as per this notice.

Kind regards,

Laurie Winter
Consents Manager