

Assessing the impact of repowered wind farms on nature

Consultation analysis

January 2019

Introduction

We consulted on draft guidance on “Assessing the impact of repowered wind farms on nature” between June and August 2018. The guidance is focussed on how to assess the effects of repowered wind farms through the EIA process. We are producing guidance because we are advising on applications to repower wind farms and we want to have a consistent and proportionate approach to the assessment process. Although there have been few repowering proposals to date, we believe that it would be helpful to establish guidelines for assessment now so that these can be tested, and if necessary modified, before the rate of repowering accelerates in the early 2020’s.

Consultation process

The consultation draft was placed on the SNH website and links sent to relevant stakeholders. The consultation ran for 11 weeks, and included a consultation seminar hosted by Scottish Renewables.

Consultation responses

A total of 38 responses were received, including:

- 9 from members of the public
- 12 wind farm developers
- 4 NGOs
- 9 lawyers / consultancies who work for wind farm developers
- Scottish Renewables
- The Law Society
- 1 Planning Authority
- Heads of Planning Scotland

The responses are all available on our website [here](#). Note – 1 response (from a member of the public) has been withheld as the individual did not want the response published; and 1 response from a consultant is not included as this was not in a suitable format.

Key messages in consultation responses:

- There were mixed views on the approach to defining a baseline for the assessment, with an almost 50/50 split for / against the approach set out in the consultation draft. Industry and those working for developers have argued that the baseline should be the existing wind farm, whilst NGOs, regulators and members of the public have argued that the baseline should be the restored site.
- Most consultees supported having fewer visualisations than proposed
- A majority of consultees wanted more detail on bird survey

- A majority of consultees stated that bird survey work should be undertaken to inform the assessment
- 1 response mentioned noise impacts, but these lie beyond the scope of the guidance
- Several responses mentioned the need for more information on carbon emissions, peatland and hydrology
- Some responses questioned whether guidance on repowering is needed
- Several responses noted the importance of climate change and the policies in favour of renewable energy
- Some responses noted a tension between the draft guidance and the Guidelines for Landscape and Visual Impact Assessment.
- Some responses noted that new Wild Land assessments should be required
- Several responses referred to the scope to use digital visualisations

Next steps

- We are considering how the guidance should respond to the views expressed in the consultation.
- We will discuss the final version with Scottish Government before finalising it.
- We hope to publish the final version in Spring 2019
- In the meantime, SNH staff will use the consultation draft to inform our responses to applications and scoping requests.