

Your Ref:
Our Ref: 18/00274/S36

16 August 2018

Alan Keir
Marine Scotland
By email to: MS.MarineRenewables@gov.scot



PLACE
Strategic Director:
Alan McKeown

Dear Mr Keir,

The Electricity Act 1989
The Electricity Generating Stations (Applications for Variation of Consent) (Scotland) Regulations 2013
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000

Application for Consent Under Section 36 of The Electricity Act 1989 (As Amended) and Marine Licence Under Part 4 of The Marine (Scotland) Act 2010 to Construct and Operate Neart Na Gaoithe Offshore Windfarm (Revised Design), 15.5 Km East off Fife Ness

I write in response to your email of 10 April 2018 in respect the above noted application, requesting comments from Angus Council as a consultee.

Appendix 1 to this letter forms Angus Council's formal response to the consultation.

I trust that the above/enclosed are in order. Should you have any queries, however, please do not hesitate to contact my colleague Ruari Kelly on 01307 473306 or e-mail KellyR@angus.gov.uk. We look forward to hearing of progress with the application/consent in due course.

Yours sincerely

Kate Cowey
Service Leader – Planning & Communities

Appendix 1: Angus Council Response to Consultation

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Angus Council has previously provided responses for the original application and a variation to the consented project. The parameters of the consented and the project now proposed are:

Parameter	The Consented Project	The Proposed Project
Maximum Turbine Generating Capacity	450MW	450MW
Total Number of Turbines	75	54
Maximum Turbine Hub Height	115m above LAT	126m above LAT
Maximum Turbine Height	197m above LAT	208m above LAT
Maximum Rotor Diameter	154m	167m
Maximum Turbine Platform Height	21m	21m

As previously identified the proposed development will give rise to some potentially significant impacts on Angus Council's administrative area. The assessment for the purposes of the current consultation will focus on any changes arising from the proposed variations to the scheme for the material considerations identified by Angus Council in the original consultation, which are:

1. Seascape, Landscape and Visual Impacts;
2. Cumulative Seascape, Landscape and Visual impacts
3. Impact on Cultural Heritage.

Seascape, Landscape and Visual Impacts

Chapter 14 of the Environmental Impact Assessment Report assesses Seascape, Landscape and Visual Impacts (including cumulative effects). This undertakes an assessment of the 'worst case' design scenario and considers the effects of installing 54 turbines with a hub height of 126m above LAT, a maximum blade tip height of 208m above LAT and a maximum rotor diameter of 167m. It is considered that this assessment captures the potential effects associated with the proposed turbine specification sought when compared to the consented project, and the associated impact, would not be any greater than that predicted in the EIA Report.

Whilst the development proposes to reduce overall number of turbines the respective increase in tip height and rotor diameter will invariably make the individual turbines more visible. It is considered that there would be significant impacts upon landscape and seascape character however these are not considered to be unacceptable. In relation to visual impacts notwithstanding the separation distances from Angus to the proposed development the turbines will result in a significant visual impact. Notwithstanding this, the findings of the ES are considered to be accurate; the visual impact on Angus is not considered to be unacceptable.

This Authority previously highlighted concerns in its consultation to the original proposal regarding the lighting of the windfarm for both shipping navigation and aviation. It is evident that this matter has been assessed in greater detail in the EIA

Report although it is highlighted that there are limitations to this assessment. The night time viewpoints confirm that the lighting would be viewed in close association and at a similar height to the light on the Bell Rock Lighthouse. Such a scenario would result in significant impacts on the setting of the lighthouse. It is evident from the visualisations that lighting both aviation and navigation would have significant night seascape impacts. Further consideration requires to be given to this matter in order to ensure an appropriate technical solution is identified and if this is the case the associated effects would be unlikely to be unacceptable.

Cumulative Seascape, Landscape and Visual Impacts

In relation to cumulative impacts the EIA Report at Chapter 14 identifies the 'worst case' design scenario for the other offshore windfarm developments as those presented in the Scoping Reports submitted to Marine Scotland for the respective developments which assume a smaller number of larger turbines. Such an approach to the cumulative assessment appears logical as it seems unlikely the consented projects will now be constructed.

Our concerns in relation to cumulative impacts remain as previously expressed in our consultation to the original proposal. We would stress that a key cumulative consideration is the relative height and design of the three different off-shore windfarm developments. A level of consistency is important to prevent the collective view becoming visually inconsistent or distorting seascape perspective by for example having turbines of noticeably different sizes within the same view. The proposal for Neart Na Gaoithe proposes the use of 208m high turbines (blade tip). Despite their distance from Angus, their size gives rise to significant visual impacts. Although this proposal is not unacceptable, the replicating of turbines of this size or at a greater size much closer to Angus and the Bell Rock Lighthouse as part of future applications may not be considered acceptable and design options available may become limited if this application is approved at 208m. It is also considered that overly broad "Rochdale Envelopes" could lead to significant differences in size and proportion of turbines between different developments or within individual developments.

It is also relevant for consideration to be given to the cumulative impacts associated with the lighting of the proposed developments. The presence of three developments will result in them being viewed alongside or in front of each other typically extending the extent of horizon effected by aviation lighting. There will also be lights in front of lights along some parts of the horizon which will significantly increase night time impacts of the developments. The lighting will likely be visible in prominent views from long distances across Angus with navigation lighting likely to be visible from higher ground which will further increase the cumulative impacts of the developments. The Bell Rock Lighthouse would be typically viewed within the same part of the horizon which would contain the turbine lighting which would significantly erode the presence of this landmark in the seascape. Further consideration requires to be given to the lighting of the developments in order to ensure a consistent lighting solution is identified and to identify methods to mitigate adverse impacts.

Impact on Cultural Heritage

Chapter 13 of the EIA Report assesses the potential impacts on cultural heritage interests resulting from the construction and operation of the wind farm in a worst case scenario. Historic Environment Scotland notes the presence of nationally important designated cultural heritage assets within the vicinity of the development – such as Bell Rock Lighthouse and Ladyloan Signal Tower, Arbroath. They are content that the impact does not raise issues of national significance. However, we consider that this impact is likely to be higher than the 'minor' value assigned to it for both setting impacts and cumulative impacts.

Angus Council has previously expressed its concerns regarding the impact of the development on the Bell Rock Lighthouse and would concur with the assessment of Historic Environment Scotland but would highlight that the EIA Report does still have limitations in terms of assessing impacts of aviation and navigation lighting on the setting of the asset.

Conclusion

It is concluded that the impacts of the proposed Nearth Na Gaoithe offshore wind farm, in terms of material considerations relevant to Angus Council administrative area, do not raise any new or significant issues. The comments provided previously by Angus Council on the original Section 36 application and subsequent variation still, to some extent, remain relevant. Angus Council does not object to this application.

~~If calling or telephoning please ask for Ruari Kelly on 01307 473306 or e-mail KellyR@angus.gov.uk~~

~~Yours sincerely~~

~~Ruari Kelly
Planning Officer (Development Standards)~~