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10 October 2017

Andrew Blyth Red Rock Power By Email.

Dear Sir.

Consultation response from Aberdeenshire Council (ENQ/2017/1738): THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED); THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED).

SCOPING OPINION FOR THE PROPOSED SECTION 36 CONSENT AND ASSOCIATED MARINE LICENCE APPLICATION FOR THE REVISED INCH CAPE OFFSHORE WIND FARM AND REVISED INCH CAPE OFFSHORE TRANSMISSION WORKS.

I refer to your request for a consultation response for the above EIA Scoping request received on 22 September 2017. I appreciate that we were not consulted as part of the formal process which concluded with the issuing of a Scoping Opinion by The Scottish Ministers on 28 July 2017 (the Scoping Opinion), but Aberdeenshire Council do nonetheless appreciate the opportunity to comment even at this late stage.

The primary area of interest for which you have sought comment from Aberdeenshire Council relates to the Seascape and Landscape Impacts proposed by the development, taking into account in particular the altered or added impacts resultant from the current iteration and revised design parameters of the scheme when compared to the previously approved scheme (notwithstanding subsequent appeals). In this regard, I would offer the following comments:

The inclusion of a 50km study area for the Seascape and Landscape Visual Impact Assessment (SLVIA) has been accepted for other offshore wind developments for which Aberdeenshire Council have been consulted. The increased height and scale of turbines within this proposal is noted and the approach as set out in the Scoping Opinion where the 50km study area is to be supplemented by additional sensitive receptors within an increased study area is considered to be a sensible and appropriate approach.

Commentary on viewpoint selection and the reasoning behind the inclusion/exclusion of certain viewpoints would be welcomed, particularly for viewpoints within Aberdeenshire. Based on the ZTV information contained within the EIA Scoping Report (the Scoping Report), the 4 viewpoints



currently proposed from Aberdeenshire do appear to be representative of the main areas of visibility within the area.

In line with comments from other Stakeholders who also fed into the Scoping Opinion, the updating of photography where required is also considered to be necessary. Similarly, while not directly consulted it is noted that Aberdeenshire Council Guidance and Policy have been referenced within the Scoping Report, again these references should be checked and where any documents, Policy or Guidance have been updated or superseded, this should be incorporated into the assessment.

We would also endorse the comments from SNH with regard to following the extant SNH Guidance, particularly with regard to establishing a coherent site layout. The subsequent assessment of this layout should also be included. The layout of the site can have distinctive influence upon the significance of the overall visual impact. Care to reduce "stacking" and cluttered layouts within viewpoints should also be taken.

Within the Scoping Opinion, reference is made to the inclusion of the Kincardine Offshore Wind Farm within the Cumulative Impact Assessment (CIA). We would agree with this and would also highlight the proposed Fetteresso onshore Wind Farm as an additional project worthy of consideration. Reference could also be made to the following database of wind energy development in Aberdeenshire: http://www.aberdeenshire.gov.uk/planning/planning-applications/wind-turbine-applications/. Wider cumulative assessment of other offshore wind energy development within the area as referenced is also considered to be necessary and this should be included in any CIA.

The Scoping details contained within Tables 9-5, 9-6 and 9-8 are generally considered to be acceptable, subject to comments already offered from other Stakeholders and contained within the Scoping Opinion.

There are no additional matters aside from those raised above which we would highlight as being necessary for inclusion within the EIA Report and we are in agreement with the conclusions of the extant Scoping Opinion as offered by Scottish Ministers in terms of Aberdeenshire Council's interests.

Should you have any issues, concerns or questions regarding the above, please do not hesitate to contact me using the contact details provided at the top of this letter.

Kind Regards,



Stuart Murison Senior Planner