

Agenda Item	<b>5.4</b>
Report No	<b>PLN/005/19</b>

## THE HIGHLAND COUNCIL

**Committee:** North Planning Applications Committee

**Date:** 22 January 2019

**Report Title:** 18/03309/S36: Moray Offshore Windfarm (West) Limited  
Moray Offshore Windfarm, Ulbster, Lybster

**Report By:** Area Planning Manager – North

### **Purpose/Executive Summary**

**Description:** Installation of 85 wind turbines with a maximum height to tip of 285m, rotor diameter of 250m

**Ward:** 03 – Wick and East Caithness

**Development category:** Major

**Reason referred to Committee:** Section 36 application

### **Recommendation**

Members are asked to agree the recommendation to **Raise no Objection** in section 7 of the report.

## 1. INTRODUCTION

- 1.1 At its last meeting on 27 November 2018 the North Area Planning Applications Committee considered a proposal for a potential 85 turbine offshore wind farm, known as Moray West, to be developed within the Moray Firth.
- 1.2 Members will recall that the recommendation made by officers was to raise an objection to the development on the basis that it was considered the development would have a significantly detrimental impact on the open and panoramic sea views along the coastline and result in a loss of uninterrupted views of the Moray coast. It was also considered that the proposal would not preserve the natural beauty of the area surrounding the application site.
- 1.3 Following considerable discussion Members agreed to raise no objection to the proposal. The reason for this decision, as provided for by the Chair, was as follows:

*Whilst it is acknowledged that the proposed development will sometimes, dependant on visibility, cause a detrimental impact on the open and panoramic sea views, recognised in the Council's Assessment of Highland Special Landscape Areas, the application needs to be assessed in its entirety. In support of the development are the likely positive effects on the local economy, in particular the amount of jobs that are to come to the Highlands; and the need to make Scotland self- sufficient in its energy generation, as supported by directives from the Scottish Government. It is considered, the economic benefits offered by this development outweigh the adverse impacts.*
- 1.4 The response to the consultation was provided to Marine Scotland on 30 November 2018. As advised at Committee, the applicant submitted an addendum to the original submission for our consideration. This was however submitted just days before the Committee meeting itself and discussion around that was not informed by a full assessment. The purpose of this Report is to assess the implications of that addendum with the intention to cover the main changes proposed to the scheme and any representations/consultation responses received relating to the addendum, in so far as they relate to the key interests of the Council.
- 1.5 The addendum contains an amended layout for the development along with the suggested removal of one option for turbine model (Model 4) within the Design Envelope presented in the original submission. The proposed amendment to the site boundary involves reducing the western extent of the site and increasing it to the south. It should be noted that the addendum does not propose to replace the scheme which the Council previously considered; instead it allows for the consideration of an alternative scheme.
- 1.6 For a detailed assessment of the proposals and full information on the development such as site description, history, an overview of the previous 'design envelope', consultation responses, detail on natural and cultural heritage within vicinity of the site, and an overview of national and local policy, please refer to the original committee report dated 27 November 2018 (Annex A).

## **2. PUBLIC PARTICIPATION**

- 2.1 The addendum was advertised on 23 November 2018 in the Press & Journal and Edinburgh Gazette and on 24 November 2018 in the Scotsman.

No further comments on the development have been made to the Council.

## **3. CONSULTATIONS**

### **Consultations undertaken by The Highland Council**

- 3.1 **Sinclair Bay Community Council:** No response received.
- 3.2 **Wick Community Council:** No response received.
- 3.3 **Tannich and District Community Council:** No response received.
- 3.4 **Latheron and Lybster Community Council:** No response received.
- 3.5 **Berriedale and District Community Council:** No response received.
- 3.6 **Helmsdale Community Council:** No response received.
- 3.7 **Brora Community Council:** No response received.
- 3.8 **Golspie Community Council:** No response received.
- 3.9 **Dornoch Community Council:** No response received.
- 3.10 **Tain Community Council:** No response received.
- 3.11 **Inver Community Council:** No response received.
- 3.12 **Tarbat Community Council:** No response received.

### **Consultations undertaken by Scottish Ministers**

- 3.13 Ministers re-consulted all consultees on this proposal at the same time as the Council received this latest consultation. At the time of writing no further consultation responses have been uploaded to the project pages on Marine Scotland's website.

## **4. ASSESSMENT**

- 4.1 In the Addendum Report submitted to Marine Scotland on 23 November 2018 the developer acknowledges that there were a number of objections to the proposal. These were summarised in the previous committee Report (Annex A). The Addendum Report responds to, and presents further information in order to

address concerns of consultees. This assessment focuses on the information submitted specifically with regard to the seascape and landscape visual impact assessments which were, and remain, of concern to the Planning Authority.

- 4.2 It is now proposed to change the site boundary, layout and turbine height in order to address concerns raised by SNH and RSPB with regard to potential adverse impacts on the qualifying features (birds) of the East Caithness Cliffs SPA and North Caithness Cliffs SPA and therefore the integrity of these designated sites. The addendum also acknowledges the concerns expressed by officers over the extent to which adverse effects could be experienced along a large proportion of the East Caithness and Sutherland coast. The report proposes mitigation to address this concern.
- 4.3 Moray West now proposes to remove the Model 4 turbine from the Design Envelope. Model 4 is the largest of the turbines identified within the original submission, measuring a total height to blade tip of 285m. It is also proposed to reduce the western extent of the site. The supporting report argues that the proposed mitigation would:
- Reduce the horizontal extent of the development, reducing the total distance over which significant effects are likely to be experienced, and reduce the number of viewpoints by which there would be a loss of views to the open sea;
  - Extending the site boundary south would create a 'block' shaped site which would reduce the number of views where views to open sea are limited or blocked and;
  - Create a more uniformly shaped site with a more even distribution of turbines within a more clearly defined boundary which would help reduce the creation of outlying turbines (those which appear separate from the site) by changing the shape of the site.
- 4.4 The removal of the largest of the turbines in effect removes the worst case scenario in terms of the turbine height from the Design Envelope. It does not propose to reduce the number of turbines. The new worst-case scenario presented is therefore 72 of the Model 3 turbine which measure a total blade tip height from the base of 265m (20m shorter than Model 4). The maximum number of turbines which would be installed should Model 3 progress would be 72 according to the parameters of the Design Envelope. No change has been presented on the layout of and extent of the site should Models 1 and 2 (which would comprise up to 85 turbines) be progressed.
- 4.5 In addition to reducing the extent of the site, and removing the largest of the turbines, it is noted that the applicant requests a reduction of the duration of the windfarm operation from 50 years to 25 years – this would be a matter to be considered and controlled as a condition to any consent issued by the Energy Consents Unit.
- 4.6 A large proportion of the addendum provides information and clarity over ornithological matters; largely relating to a number of species of birds in response to an objection from SNH. SNH has drawn its own conclusions from the

information and respond directly to Marine Scotland. The latest consultation response maintains the objection to the proposal as it is considered that the proposal will continue to have an adverse effect on site integrity for kittiwake as the qualifying int4rst of the East and North Caithness Cliffs SPAs in combination with other adjacent consented development. The outstanding objection could still potentially influence the final design.

- 4.7 Considerable emphasis is placed on the reduction of the operational period from 50 to 25 years within the addendum. In its view the applicant considers that this results in a reduction in the magnitude of impacts on the seascape, landscape and visual receptors on the basis that the duration over which the turbines will be visible will be reduced. However, it is not considered that a reduction in the lifespan should be afforded significant weight when assessing the visual impacts. The same impact will still exist for a significant amount of time; the proposed turbines will be visible and thereby impact on views from coastal communities regardless.
- 4.8 It is argued within the Addendum that the 'Alternative Moray West Site' better coincides with rows of turbines set out within the Moray East layout. No changes have been submitted in the Addendum in respect of the layout of the 85 turbines for Models 1 and 2 which were originally assessed.
- 4.9 In the previous committee report, it was identified that there were significant visual impacts from ten viewpoints between Wick and Brora which included Wick (VP3), Sarclet (VP4), Lybster (VP7), Dunbeath (VP9a), Navidale (VP12) and Brora (VP13a). The addendum includes amended SLVIAs for each of the proposed turbine models at the above locations.
- 4.10 In the assessment of the original scheme, it was considered that while there was capacity for development on the site, the extent of development proposed was not acceptable as turbines would occupy a large proportion, or in some cases all, of the available horizon; particularly where the horizontal extent of sea view is limited i.e. where views out to sea being contained within headlands. Turbines would come to dominate the horizon.
- 4.11 The view taken was that the westward extent of the development needed to be reduced in order to retain some of the seascape from sensitive coastal areas and allow contained 'slot views' across to the Moray Coast. A suggestion was that any turbines to the west of a theoretical line drawn between Lybster on the Caithness coast and Portknockie on the Moray coast (effectively taking a line from the current Beatrice demonstrator turbines) should be removed. The revised boundary and layout does not extend that far, but does remove the most westerly turbines.
- 4.12 In the alternative site layout the turbines are of a more vertical layout, extending in a southerly direction toward Portknockie and Buckie on the Moray coast. This results in reduction of the horizontal view which would be experienced from the East Sutherland coast; minimising impact from viewpoints at Tarbatness and Brora and going some way to reduce the linear extent of turbines when viewed from Helmsdale and Lybster and Sarclet. Overall the extent of the development has

been reduced in length by 4km from 30km to 26km. A cluster of three turbines which appeared as outliers has been removed. SNH commented that the mitigation offered with regard to SLVIA impacts is welcomed.

- 4.13 While the use of Model 3 turbines would help further to reduce the extent of turbines across the horizon from the coast that scale of turbine will be at odds with those of the adjacent already consented schemes. It is therefore not considered that the same number of turbines or a reduction in turbine numbers through an increase in height goes far enough to address the concerns initially raised. Of all the assessed scenarios, the Model 2 turbine would be the preferred scale as any larger turbines may add further complication in relation to perception of scale when considered in relation to the existing consented development.
- 4.14 Limiting the extent of turbines westward does at least afford some views to open seas with uninterrupted horizon. This is beneficial for those coast to coast views that are a feature of the transition into the Inner Moray Firth. While the mitigation is welcomed it is not considered to go far enough to address the concerns over how visual receptors will appreciate views to open sea horizons and the eastern extent of visibility of the Moray Coast.
- 4.15 Having said that, the amended layout and site area is preferred over the original scheme. The 72 turbine layout with Model 2 turbine is considered the most appropriate scenario that which will read better with the neighbouring windfarms which are currently being developed. However, what is presented is 72 Model 3 turbines.

## **5. CONCLUSION**

- 5.1 The Development Plan and national planning policy support renewable energy development where projects can be located without undue environmental or amenity impact. The Highland Renewable Energy Strategy considers this part of the Moray Firth as a suitable site for offshore wind development. There is capacity for further off-shore wind development in this general location.
- 5.2 While it is still considered that the extent of the development should be reduced, the alternative scheme is an improvement over the original submission. Having said that the larger scale of turbine is not considered to be consistent with neighbouring consented development and the preference is therefore for this layout to be progressed with Models 1 or 2, rather than Model 3, in mind.
- 5.3 As this is not a planning application being handled by The Highland Council, the final layout and design will be agreed by Marine Scotland on behalf of Scottish Ministers. Given that the Council already agreed not to object to the original scheme, a Raise no Objection response to this latest consultation would appear appropriate but with a recommendation that the alternative scheme is progressed and on the basis of the 72, Model 2, turbine option.

## **6. IMPLICATIONS**

- 6.1 Resource: Not applicable
- 6.2 Legal: Not applicable
- 6.3 Community (Equality, Poverty and Rural): Not applicable
- 6.4 Climate Change/Carbon Clever: Not applicable
- 6.5 Risk: Not applicable
- 6.6 Gaelic: Not applicable

## **7. RECOMMENDATION**

- 7.1 It is recommended that The Highland Council **Raise no Objection** to the addendum subject to:
  - A. A clear recommendation to Marine Scotland that the Council's preference is for the alternative scheme to be progressed but on the basis of the 72 turbine scheme being development with the Model 2 turbine.

### **AND**

- B. The following conditions:
  - 1. No development shall commence on any Phase of the development until the Council has been consulted, and given its considered opinion, on the design and layout options for that Phase having taken into consideration the design and layout of the neighbouring Phases of the Moray East windfarm development.
  - 2. No development shall commence on any Phase until the Council has been consulted, and given its considered opinion, on the lighting requirements for the chosen design and layout options for that Phase having taken into consideration the design and layout of the neighbouring Phases of the Moray East windfarm development.
  - 3. The applicant shall maximise the amount of GVA in terms of employment and associated economic activities that comes to the Highlands, as a result of the construction phase of the project.
  - 4. The applicant shall continue dialogue with the Highland's renewable energy supply chain and its ports and harbours, including Nigg and Port of Cromarty as a potential operation and maintenance facility.

5. The applicant shall continue to work with the relevant public and private sector bodies in the Highlands to ensure that the area achieves maximum socio-economic returns from the development.

Signature: Dafydd Jones

Designation: Area Planning Manager – North

Author: Laura Stewart

Background Papers: Documents referred to in report and in case file.

Relevant Plans: Plan 1 - Boundary Amendments

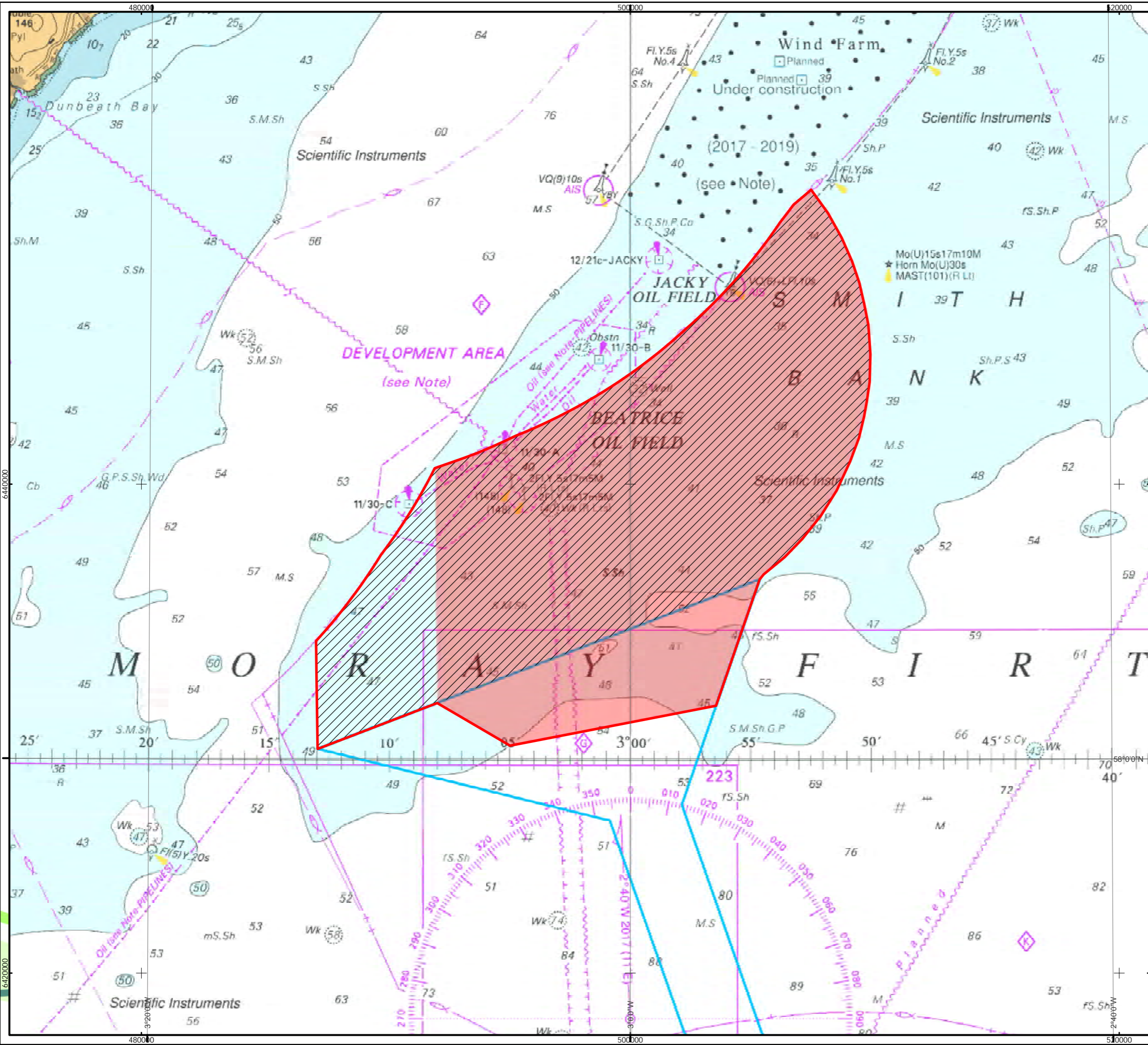
Plan 2 - Model 3 Amended Layout Plan

Appendix – Letters of Representation

None

ANNEX A – Committee Report – 27 November 2018.





# MORAY WEST OFFSHORE WINDFARM

## KEY

- Combined Boundary
- Current Moray West Site Area
- Alternative Moray West Site Area
- Offshore Export Cable Corridor

Horizontal Scale: 1:150,000 A3 Chart

Geodetic Parameters: WGS84 UTM Zone 30N

Produced: MG  
 Reviewed:  
 Approved:

Date: 26/11/2018 Revision: A  
 REF: 8460005-DBDC01-MWW-MAP-000004

Figure 1.2 (Updated):  
Boundary Amendments

Moray Offshore  
Windfarm (West) Ltd

## KEY

- Alternative Moray West Site
- Current Moray West Site
- Proposed Variation Area
- Proposed Mitigation Area
- Offshore Export Cable Corridor
- 50km Study Area Boundary
- 10km Distance Radii
- Local Authority Boundary
- Model 3 (Mitigated) Layout
- BOWL Turbines (Under Construction)
- Moray East (Consented, DSLLP Layout)
- Viewpoint Locations\*

## Zone of Theoretical Visibility No. of Turbines (265m) Visible

- 1 - 12
- 13 - 24
- 25 - 36
- 37 - 48
- 49 - 60
- 61 - 72

Blade tip height:	265m
Observer height:	2m
DTM:	OS T5
Surface features:	Excluded
Earth curvature:	Included

Note: \* Viewpoint locations listed in Figure 11.1b

Horizontal Scale: 1:500,000 A3 Chart N

Geodetic Parameters: WGS84 UTM Zone 30N  
 Produced: JM  
 Reviewed: LT  
 Approved: JG  
 Date: 22/11/2018  
 REF: 8460005-DBDD11C-OPN-MAP-000001  
 Revision: C

### Figure 11.1a Blade Tip ZTV with Viewpoints (Model 3)

Moray Offshore  
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