

ABERDEEN CITY COUNCIL

COMMITTEE	Planning Development Management Committee
DATE	14 July 2016
DIRECTOR	Pete Leonard
TITLE OF REPORT	Kincardine Offshore Windfarm Environmental Statement
REPORT NUMBER	CHI/16/125
CHECKLIST COMPLETED	Yes

1. PURPOSE OF REPORT

- 1.1 To describe the proposed development and summarise the findings of the Environmental Statement (ES) which are relevant to the Council's interests. The ES, including a non-technical summary, can be seen at: <http://www.gov.scot/Topics/marine/Licensing/marine/scoping/Kincardine/>
- 1.2 To present the views of officers on aspects of the ES which are relevant to the Council's interests.
- 1.3 To seek approval for officers to issue the Council's response, as a statutory consultee, to Marine Scotland. The response deadline is 8th August 2016.

2. RECOMMENDATION(S)

- 2.1 That the committee:
 - (a) Approves the response.
 - (b) Instructs officers to submit the response to Marine Scotland as detailed in Annex 1 of this report.
 - (c) Instructs officers to seek to work with the developer to promote local supply chain and employment opportunities.

3. FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications for the Council associated with this proposal, which is being funded by a private developer.

4. OTHER IMPLICATIONS

- 4.1 Resources from Communities Housing and Infrastructure will be required to process the separate application for planning consent for the land-based elements of the proposal. This is part of normal procedure and is achievable within existing resources.

5. BACKGROUND AND MAIN ISSUES

Proposal

- 5.1. Kincardine Offshore Windfarm is a proposed semi-submersible floating windfarm to be located approximately 8 miles (15 km) south east of the Aberdeen coastline. The location is shown in Figure 1-1 on page 26 of the ES. The project aims to demonstrate the commercial viability of floating offshore windfarm technology, including the ability to significantly reduce offshore construction periods.

- 5.2. The components of the proposal are:

- The windfarm, located in the Development Area, comprising:
 - a) Between 6 and 8 floating wind turbines generating up to 50 MegaWatt (MW), located in approximately 60 - 80 metres depth of water, spaced no less than 1km apart with a maximum height to blade tip of up to 176 metres. A turbine example is illustrated in Figure 2-3 on page 54 of the ES.
 - b) Inter-array cables.
- Offshore transmission works, located within the Offshore Export Cable Corridor. Up to two subsea export power cables for transmitting the power generated to land. The indicative corridor is indicated in Figure 2-7 on page 61 of the ES.
- Onshore transmission works located in the Onshore Area including underground cables connecting to an onshore substation at Redmoss, located within the Aberdeen City Council administrative boundary. Figure 16-1 on page 633 of the ES illustrates the alternative onshore cable routes and substation location.

- 5.3. Several factors influenced the selection of this site, including the suitability of water depth for floating foundation turbines, favourable sea and wind conditions, proximity to substations in Aberdeen for the grid connection, a location outwith the Dyce Airport radar area, the limited amount of fishing activity in the area, and the access to facilities at Aberdeen Harbour.

Consents

- 5.4. Offshore components require a licence under the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009, and require an Environmental Impact Assessment (EIA). Marine Scotland is the regularity authority and the Council is a statutory consultee.
- 5.5. Consent is also required from Marine Scotland under Section 36 of the Electricity Act 1989 for offshore windfarms generating more than 1MW.
- 5.6. The Onshore component will require planning permission under the Town and Country Planning (Scotland) Act 1997 for which this Council is the regulatory authority.
- 5.7. In addition to an EIA, the project requires an Appropriate Assessment under the Habitats Regulations (1994 as amended). A Habitats Regulations Appraisal (HRA) has been undertaken to assess the potential impacts on conservation sites of European importance and to inform the Appropriate Assessment.

Policy context

- 5.8. UK and Scottish government policies promote offshore renewable energy, including the National Renewable Action Plan for the UK and the Scottish Renewables Action Plan. The Scottish Government's 2020 Routemap for Renewable Energy in Scotland has set a challenging target for Scotland to meet an equivalent of 100% demand for electricity from renewable energy by 2020 and at least 30% overall energy from renewables, also by 2020. The Routemap recognises the importance of offshore wind in helping to achieve these targets and to make a significant contribution to the Scottish economy through the manufacturing and supply chain, job creation and training opportunities. The Electricity Generation Policy Statement (Scottish Government 2013) includes an expectation that offshore renewables will play a major role in meeting Scottish renewable energy targets for 2020 and beyond.
- 5.9. The Scottish National Marine Plan (2015) sets out strategic policies for the sustainable development of Scotland's marine resources, and guides decision making for offshore renewables. It sets out the requirement for assessment of environmental effects and the need to maximise community, social and economic benefits from offshore renewable energy developments.
- 5.10. Development and implementation of transformational renewable energy solutions at all scales, and their associated benefits, is also a key City Region ambition as articulated through a number of documents; City Region Deal; Regional Economic Strategy, Shaping Aberdeen and Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan (draft). This proposal feeds directly into the realisation of these ambitions.
- 5.11. Although planning policy does not regulate offshore wind energy decisions, both the National Planning Framework and Scottish Planning Policy (SPP) set out the Scottish Government's low carbon economy

national objectives, linking to the 2020 Routemap. The SPP requires the planning system to support the transformational change to a low carbon economy, consistent with national objectives and targets. The support for renewable energy projects is echoed in the Aberdeen City and Shire Strategic Development Plan (2014) and the Aberdeen City and Shire Structure Plan (2009). The Aberdeen Local Plan Policy R8 Renewable and Low Carbon Energy Developments supports the principle of renewable energy schemes if proposals do not cause significant harm to other interests, including the local environment, air quality, tourism and the amenity of dwelling houses.

- 5.12. Although not policy, Good Practice Principles for Community Benefits from Offshore Renewable Energy Developments (Scottish Government 2015) encourages offshore renewable energy developers to prepare voluntary community benefits packages so that communities near to these developments directly benefit.

Predicted impacts

- 5.13. The ES states that the effects of the proposal are as follows:
- 5.14. No significant residual adverse impacts (that is, after mitigation measures have been taken) are predicted for:
- The Physical Environment
 - Benthic (sea bed) Ecology
 - Fish and Shellfish Ecology
 - Marine Mammals
 - Birds
 - Underwater noise
 - Marine Navigation
 - Military Aviation
 - Marine Historic Environment
 - Socio-Economics (there would be temporary, beneficial effects, but not significant)
 - Commercial Fisheries
 - Other Marine Uses (including existing cables and scuba diving)
- 5.15. Significant residual adverse impacts are identified for:
- Landscape/seascape and Visual - visual impacts for some seascape, and at some viewpoints.
- 5.16. Onshore elements are not assessed as this is not within the scope of the EIA. A brief description of possible impacts is included in the ES and these are considered further in the draft response (Annex 1).

Scope of Aberdeen City Council response

- 5.17. Due to the marine location, the majority of the environmental matters considered in the ES are not relevant to Aberdeen City interests.

Scottish Natural Heritage has the appropriate expertise to assess marine impacts and has provided advice to Marine Scotland.

5.18. The issues of interest to the Council are set out in the attached response. These focus on:

- Socio-economic impacts and community benefits.
- Landscape and Visual impacts.
- Historic Environment and Archaeology impacts.
- Habitats Regulations Appraisal.
- Onshore proposals.

Evaluation

5.19. The project helps to deliver national, regional and local policies for renewable energy and sustainable development. This is a strategically important project and the presence of this development in waters off the Aberdeen coast would be significant and if successful should lead to access to greater opportunities for local companies in the future. Following on from onshore wind and fixed offshore wind, floating wind energy generation is the next prime diversification opportunity for the oil and gas industry.

5.20. Notwithstanding the potential for broader benefits, the effects on the local economy and communities have not been adequately assessed, and the information on job creation is unclear. Whilst there would be some beneficial local economic effects this would be small. The overall level of job creation is quite low and there is no information on skills requirements, so the opportunities for local employment may be limited. There are no identified or proposed community benefits.

5.21. Adverse impacts are predicted for landscape/seascape and the historic environment, although these are limited in nature due to the distance of the proposal offshore. However the cumulative effects on landscape and seascape with Aberdeen Offshore Windfarm and Nigg Harbour proposals have not been adequately addressed in the ES. In combination the three developments will result in significant change occurring over large areas of coastal landscapes and seascapes around Aberdeen.

5.22. In summary, it is recommended that the proposal be supported in principle due to the wider renewable energy and sustainable development objectives it helps to deliver. However the developer should be requested to submit additional information, commit to measures for local employment and community benefits, mitigation for landscape/seascape impacts, and work with the Council to promote local supply chain and employment opportunities, as set out in the consultation response (Annex 1).

6. IMPACT

Improving Customer Experience –

The proposal is from a private developer. Through our response to this consultation we have an opportunity to highlight opportunities for enhancing economic wellbeing and community benefits, in line with the aims of the Regional Economic Strategy and Community Planning.

Improving Staff Experience –

The proposal has provided an opportunity for the staff to engage with, and inform, leading edge developments on offshore windfarms which may affect Aberdeen.

Improving our use of Resources –

Not relevant. This is an external proposal which does not affect the Council's use of resources.

Corporate –

Not relevant. This is an external proposal.

Public –

This is an external proposal and an EHRIA is not needed. Upon completion of the 'screening questions' it is concluded that Privacy Impact Assessment (PIA) is not required.

There will be public interest in Kincardine Offshore Windfarm (KOW). It will add a second windfarm off the coast of Aberdeen, in addition to the consented Aberdeen Offshore Windfarm, albeit that the KOW proposal is 14-15km from shore and will be further out to the horizon. There is also potential for concerns about further development which will be visible from the Nigg Bay and Torry areas, with few, if any, direct benefits to the local community. The land-based elements of the proposal which may affect the public will be subject to a separate terrestrial planning process and associated consultation. There is potential interest in the long term benefits the proposal may provide in terms of economic diversification for Aberdeen.

7. MANAGEMENT OF RISK

There could be reputational risk if the Council does not support the proposal in principle, given the support for renewable energy expressed in Council policies and strategies, and the potential for delivering economic diversification. The Council's proposed response requests obligations to be placed upon the developer to maximise the opportunities for local economic and community benefit. Environmental risks are managed through the EIA process

8. BACKGROUND PAPERS

The Environmental Statement and accompanying documents can be viewed on line at:

<http://www.gov.scot/Topics/marine/Licensing/marine/scoping/Kincardine/>

A copy of the Environmental Statement, Visualisations, Non-Technical Summary, Pre-Application Consultation Report and Habitats Regulations Appraisal is available in the member's library (from p.m. on Monday 27 June 2016).

9. REPORT AUTHOR DETAILS

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Annex 1: Proposed response to Marine Scotland

Catarina Aires
Marine Scotland Licensing Operations Team
Scottish Government
Marine Laboratory
375 Victoria Road,
Aberdeen
AB11 9DB

Dear Catarina,

PROPOSAL: CONSENT TO CONSTRUCT AND OPERATE KINCARDINE OFFSHORE WINDFARM

SECTION 36 AND 36A OF THE ELECTRICITY ACT 1989

The Electricity Works (Environmental Impact Assessment) (Scotland)

Regulations 2000

The Electricity (Applications for Consent) Regulations 1990

MARINE (SCOTLAND) ACT 2010, PART 4: MARINE LICENCE

MARINE AND COASTAL ACCESS ACT 2009

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

Thank you for your consultation of 8 April 2016 on the proposed Kincardine Offshore Windfarm. We have considered the Environmental Statement (ES) and supporting documents and have the following comments:

1. We support the proposal in principle. It helps to deliver Scottish Government policy for renewable energy and sustainable development. Although the development is offshore, the proposal aligns with terrestrial planning policy, including Aberdeen City and Shire Strategic Development Plan targets for renewable energy generation and the objectives of Aberdeen Local Development Plan Policy R8 Renewables and Low Carbon Energy Development.
2. Development and implementation of transformational renewable energy solutions at all scales, and their associated benefits, is also a key City Region ambition as articulated through a number of documents; City Region Deal; Regional Economic Strategy, Shaping Aberdeen and Powering Aberdeen: Aberdeen's Sustainable Energy Action Plan (draft). This proposal feeds directly into the realisation of these ambitions.
3. The proposed windfarm is a demonstrator project which will explore technical issues for offshore wind energy. This strategically important project has the potential for creating access to greater economic opportunities in Aberdeen, including diversification for the oil and gas industry. When operational, the windfarm will help to deliver national objectives for sustainable energy supplies and will contribute to reductions in climate change emissions. One of the potential outcomes is a better

understanding of how windfarms could be deployed further offshore, helping to deliver renewable energy whilst reducing the impacts of such developments on the landscapes, seascapes and wildlife enjoyed at the coast by residents and visitors to Aberdeen.

4. However we consider that ES inadequately addresses some aspects of the social, economic and environmental effects. We advise that the ES should be expanded to include further information and mitigation measures as a condition of consent, and the developer should be encouraged to prepare a local community benefit package, as outlined below. The developer will also need to consider the environmental effects of the onshore works at the appropriate time through the terrestrial planning process.
5. Our comments are set out below. For further detail, see Appendix 1.

Socio-economic impacts and community benefits

6. Fixed offshore wind energy is a prime diversification opportunity for the oil and gas industry. Floating offshore wind energy is the next generation of technology and represents a further opportunity. The presence of this development in waters off the Aberdeen coast would be significant in terms of lessons that can be applied to other, bigger projects and if successful should lead to access to much greater opportunities for local companies in the future.
7. However, whilst there would be some direct beneficial local economic effect, this would be small scale. The ES contains little evidence about the characteristics of employment being created (e.g. skills group). The assessment suggests some economic benefits to the city and region, though these cannot be automatically translated into benefits to the local economy or communities of Altens and Cove.
8. Local socio-economic disruption, and the impacts on tourism are assessed as 'negligible' but there is no evaluation or measurement in the ES so this cannot be substantiated. The impact on fisheries is assessed as 'no impact/negligible/minor' but there is no quantification in economic terms so this cannot be substantiated.

Mitigation advised

9. The use of community benefit clauses in the procurement process to target local recruitment and training between the delivery of the project and neighbouring communities, including targeting the unemployed. It should be borne in mind however, that the overall level of job creation is quite small so the opportunities may be limited.
10. Information on local employment opportunities should be publicised whilst complying with acceptable recruitment practice, including:
 - Working with the Job Centre to deal with employment enquiries and applications during the construction process.

- Establishing a local training and employment committee with the aim of early matching of job opportunities, local supply and training provision.
11. Sponsor a set number of schoolchildren/school leavers from regeneration areas through secondary schools, with mentoring, work experience and apprenticeships, for example in construction/cabling trades.
 12. Advertise local suitable business opportunities associated with the construction and operation of the development.
 13. Work with Aberdeen City Council to identify opportunities to promote local supply chain and employment opportunities.
 14. Develop and deliver an educational programme about windfarms for schools which promotes an understanding of the wide range of career opportunities in this sector.

Landscape and visual

15. The Kincardine Offshore Windfarm (KOW) introduces a built element into an otherwise undeveloped seascape which is located off a largely undeveloped coastline. On its own, the small number of turbines in KOW and distance from shore limits the impact of this proposal. However the ES does not consider the impacts of lighting at night time, nor does it adequately address the cumulative effects with the Nigg harbour proposals and Aberdeen Offshore Windfarm (also known as European Offshore Windfarm Deployment Centre or EOWDC). In combination the three developments will result in significant change occurring over large areas of the coastal landscapes and seascapes around Aberdeen.

Information requested

16. The following additional information is requested to assess the effects of the proposal:
 - Night-time lighting assessment of the proposed windfarm.
 - A thorough and documented assessment, using appropriate baseline data, of the cumulative effects (including night-time lighting) with Nigg Harbour Extension and Aberdeen Offshore Windfarm
 - Recommendations for mitigating any identified adverse night-time lighting and cumulative effects.

Historic Environment

17. Several terrestrial historic assets will be visually impacted upon by the proposed development, including Torry Battery, Girdleness Lighthouse,

Dunnottar Castle, and Stonehaven War Memorial. These sites have been considered in the assessment and while the impact is acceptable in this instance, any future offshore development will have to take into consideration cumulative visual impact.

Habitats Regulations Appraisal (HRA)

18. The information provided in the HRA is sufficient to inform the Appropriate Assessment of the proposals as far as it affects the Council's interests on land. The Council defers to SNH's response to Marine Scotland in relation to the marine environment.

Onshore proposals

19. Onshore works are to be the subject of a separate application for planning permission and pre-application discussions have taken place. The application will need to follow due process. We are supportive of the overall project in light of its alignment with local, regional and national planning and energy policies, however consideration will be required of the land-based environmental effects of the proposal as set out in Appendix 1.

Yours sincerely,

Pete Leonard

Director of Communities, Housing and Infrastructure

Appendix 1: Detailed comments

Socio-economic impacts and community benefits

Assessment of economic impacts

1. While the positive economic impacts of the proposed project are noted, a major weakness of the socio-economic impact assessment is its treatment of the “local project zone” (LPZ) as being synonymous with the “construction daily commuting zone” (CDCZ) or the “wider impact zone” (WIZ). Impacts arising from any project are likely to affect surrounding geographical areas, starting from LPZ (Altens and Cove), CDCZ (Aberdeen, Aberdeenshire) and the WIZ (Scotland and UK). The overall benefits of the project to Aberdeen City or the region do not automatically translate into benefits for the communities in the LPZ (Altens and Cove). For example there are aspects of the project relating to onshore works (i.e. landfall, cable corridor and substation site) and these works have implications for the local community or LPZ.

Evidence of employment creation and local benefits

2. There is little evidence from the report of
 - Characteristics of employment (e.g. skills group) which benefits the local economy
 - Output, income and employment for the local community
 - local labour supply and training and potential wage levels
3. The figures in the ES are unclear. In terms of job creation they seem to be:
 - Fabrication of substructures - 40 over 2 years
 - Wind turbines – not counted as will be manufactured outside Scotland
 - Assembly and installation – 40 over 2 years at “installation port”
 - Cable laying – 20 over 3-6 months
 - Onshore substation – not stated, could be included in the cable laying figure
 - Operations and maintenance – 4 offshore engineers and 4 onshore personnel for 25 years
 - Plus some unquantified small numbers of jobs in offshore construction workers, vessel operators and engineers during construction
 - Decommissioning – no information
4. There seems to be some overlap in the way the figures are presented and there is lack of clarity about where the jobs will be created. Fabrication of the substructures for example is not likely to be carried out at either Aberdeen or Peterhead port. There is reference to the

“installation port” but it is not specified. The following is our understanding of the figures:

- Operations and maintenance - 4 offshore engineers and 4 onshore personnel for 25 years from either Aberdeen or Peterhead (the ES does say that the vessel and personnel may be shared with another windfarm so this might have to be discounted)
 - Unquantified small numbers of jobs in offshore construction workers, vessel operators and engineers, also either from Aberdeen or Peterhead.
5. It is highly possible but not guaranteed that because of the nature of the local industry that the cable laying work (20 jobs) could go to a local company. The value of the operations and maintenance should not be underestimated as over the life of the project because it usually equates to about the same as the construction costs.

Assessment of community effects

6. There is little evidence in the ES of how the project will affect:
- The demographics of the local community
 - Housing tenure, types and prices for the local people as the result of the new project
 - Social services like schools, health, social support, police, fire, recreation, transport, community stress, conflict, integration, cohesion and alienation because of workers in around the area.
7. There are no proposals to provide community benefits.

Seascape/landscape and visual impact assessment

8. Aberdeen City Council was consulted during the pre-application process and made recommendations for improving the standard and scope of visualisations. The majority of the comments were taken on board. We note a discrepancy in the scale of the windfarm which appears larger / closer to the shore in the wireline diagram for Viewpoint 7 at Doonies Farm (Figure D-3) when compared with the photomontage (Figure D-4). We have assumed that the photomontage is the correct image in the comments that follow.

Operational phase (lifespan 25 years) – landscape/seascape impacts

9. There are 27 Landscape Character Areas in Aberdeen. These exclude urban areas, but include coastal landscapes.
- Adverse impacts of moderate/major significance are identified for two Landscape Character Areas (LCAs), both of which are within Aberdeen, and coastally located (LCA 8 Aberdeen Links and LCA 23 Girdleness/Nigg Bay). This affects a large proportion of Aberdeen’s coastline.

- Moderate adverse impacts on seven LCAs, five of which are in Aberdeen (LCA 25 on the coast (Doonies/Cove) and LCAs 5, 6, 7 and 24 - located just inland of the coast)). This affects a large proportion of Aberdeen's coastline.
10. Adverse impacts of minor significance are noted for national Seascape Unit 4.

Operational phase - Visual impacts

11. The visual assessment considers impacts on 23 viewpoints. Of these, four (viewpoints 4, 5, 6 and 7) are located within Aberdeen, and one (viewpoint 3) is from ferry routes off the coast of Aberdeen Harbour.
- The ES identifies adverse impacts of moderate/major significance on viewpoints 8, 10 and 16, all in Aberdeenshire.
 - For viewpoints in Aberdeen City, there are no identified major impacts. Moderate effects are found on the walkers and visitors at VP4 (Eastern Boulevard) and the seascape of VP7 Doonies farm. Minor/moderate impacts are found for the remaining city viewpoints.

Night-time effects

12. Potential for night time impacts (that is, from any lighting of the development) is noted (Table 11-7) however this has not been assessed.

Cumulative effects

13. Although it is stated that cumulative effects with Aberdeen Offshore Windfarm are considered as part of the Landscape and Visual Impact Assessment this is not evident in the ES.
14. The assessment of cumulative impacts with Nigg Harbour is addressed in one sentence, and on the basis of information available appears inaccurate, stating that the windfarm will be significantly masked by the southern breakwater. The Nigg harbour EIA photomontage from the viewpoint at Girdleness, the (Nigg Harbour EIA Chapter 17, Figure 4(b)) illustrates that the horizon where the turbines would be located would be visible above the southern breakwater. There is at least an additive effect (the two developments being seen in the same views), resulting in increased impacts along this stretch of the coast.
15. Cumulative effects need to be considered from more than one viewpoint, for example there are sequential effects experienced by travelling (by foot e.g. along the coastal path, or by road and rail) along the coast and how the two development inter-relate. As both developments (harbour extension harbour and windfarm) will be visible from key viewpoints such as Girdleness and Gregness, there would be expected to be additional sequential impacts along the coast. Given the

current undeveloped nature of the seascape and coastal landscapes the combination of effects are expected to result in significant adverse effects on the seascape and visual characteristics of the Aberdeen coast in this area.

Assessment baseline and scope

16. Reference is made to SNH guidance 'Offshore Renewables – guidance on assessing the impact on coastal landscape and seascape'. However the baseline information used is dated (Aberdeen Landscape Character Assessment 1996) and at an inappropriate scale (An assessment of the sensitivity and capacity of the Scottish Seascape in relation to offshore windfarms (SNH 2005). The latter is a national scale assessment, not suitable as baseline assessment of the coast for detailed EIAs. The ES relies on a land-based landscape character assessment which is not focused on coastal and seascape character. No further coastal character or seascape assessment appears to have been carried out to inform the assessment.
17. There has been no assessment of impacts on routes, and movement corridors, including how the coast is experienced sequentially along the coastal path, national cycle route and roads.
18. A map is needed to illustrate the location of LCAs, identify which are within Aberdeen City and which are within Aberdeenshire, and showing the boundaries of seascape units to aid understanding of the assessment.
19. Page 521. A map of other windfarms in Table 11-15 should be provided to aid understanding of the assessment.

Historic Environment and Archaeology

20. Chapter 12 Marine Historic Environment. Currently responsibility for commenting on archaeological matters relating to offshore development lies with Historic Environment Scotland, with devolved comments being requested from the Council's Archaeology Service. Taking this into account, and having reviewed the chapter, we can confirm that the proposed mitigation methodology is acceptable and requires no additions or changes.
21. Chapter 16 Onshore (Section 16.5 Cultural Heritage). We agree with the assessment of the low potential direct impact upon archaeological remains, and that where appropriate, an archaeological watching-brief during topsoil stripping will be required. Where directional drilling is used no mitigation will be required.
22. Chapter 11 Seascape and Landscape Visual Impact Assessment. Several terrestrial historic assets will be visually impacted upon by the proposed development, including Torry Battery, Girdleness Light House,

Dunnottar Castle, and Stonehaven War Memorial. These sites have been considered in the assessment and while the impact is acceptable in this instance, any future offshore development will have to take into consideration cumulative visual impact.

Onshore proposals

23. Onshore works will be subject to a separate application for planning permission and pre-application discussions have taken place in regards to that element. The application will need to follow due process.
24. We are supportive of the overall project in light of Scottish Planning Policy for renewables and sustainable development, the structure plan targets for renewable energy generation and the objectives of local plan policy R8. The developer will need to consider the environmental effects of the proposal as set out in this consultation response.
25. Any disturbance to existing trees / vegetated areas resulting from the onshore works will require mitigatory planting to be agreed with the Council in accordance with the objectives of local plan policies NE1, NE2, NE5, NE7, NE8 and D6. Provision of Sustainable Urban Drainage Systems (SUDS) and screening to mitigate the impact of the compound will be required in accordance with policies NE6 and D6. The preferred cable routing and substation compound location is Route C, which is largely within an industrial area.

Ecology

26. As stated in the ES, the considerations for impacts to terrestrial ecology will be part of a separate planning application. Comments are provided below on the desk based assessment within the ES which will inform the forth coming planning application.
 - Local Natures Reserves (LNR's) are statutory designated sites as per the National Parks and Access to the Countryside Act 1949, and should be classed and assessed as such within the planning application. They are wrongly noted as non-statutory within the ES.
 - Include Kincorth Hill Local Nature Conservation Site (LNCS) in the list of non-statutory designated sites. The LNCS covers a larger area than the Kincorth Hill LNR and is designated for different reasons to the LNR. Potential impacts on both the Kincorth Hill LNR and LNCS should both be assessed in the planning application process.
 - The coastline LNCS is called the Balnagask to Cove LNCS and covers a larger area than that shown on the map (Figure 16-4).

- Section 16.4.3 – number 41. SSSI's are national designated sites, not international as stated in the ES, and should be assessed as such as part of the planning application process.
- From the information provided, direct impacts will likely be on the Balnagask to Cove LNCS and, we note that the Council's Environmental Policy team will be contacted during the planning application process to agree protection and mitigation measures. Other designated sites in the surrounding area should be assessed for potential indirect impacts.
- We agree that an ecological survey should be conducted at the appropriate time of year in advance of submitting the planning application. The scope and timing of surveys should be agreed with the Council and will include habitats and species associated with the designated sites as well as the wider area affected by the development, including protected species (bats, badger, otter and great crested newts). The surveys should be conducted at the correct time of year for that species, e.g. refer to the Bats and Development Supplementary Guidance. The surveys should be submitted as part of the planning application supporting information.
- We agree that SEPA Pollution Prevention Guidance should be followed at all times during construction to protect all water bodies identified/affected by the development.

Landscape

27. The proposed landfall is within Doonies to Cove Coast Landscape Character Area which is currently an undeveloped, open coastline identified as sensitive to development in the Aberdeen Landscape Character Assessment (1996). The ES states that the landfall and cable corridor works will be underground once operational, and that there will be a landfall marker, but no significant landscape and visual effects. Given the sensitivity of the site, a landscape and visual appraisal will be required to enable the landscape impacts of proposal to be assessed.