

**27 January 2021**

Giulia Agnisola  
Case Manager  
Marine Scotland Licensing &  
Operations Team  
Marine Laboratory, 375  
Victoria Road  
Aberdeen, AB11 9DB

**Dear Giulia Agnisola,**

Inch Cape Offshore Wind Farm Limited (ICOL) is seeking to vary the Inch Cape Offshore Wind Farm Section 36 Consent (048/OW/RRP-10). The purpose of the application is to remove the maximum generation capacity of the Inch Cape Offshore Wind Farm (the Wind Farm) as stated within the Section 36 Consent.

Through discussions with leading WTG suppliers, and since applying (and receiving consent, to increase the overall generating capacity to 'up to 1000MW' ICOL has identified that further gains in maximum generating capacity may be possible utilising the consented project design envelope and within the project's timeframes. ICOL is committed to developing the project in as short a timeframe as possible, WTG technology is progressing rapidly and within the next two to four years, the market predicts higher rating models available. In line with these further advancements ICOL has recently been awarded an updated grid connection agreement of 1080MW and therefore, ICOL is seeking to remove the reference to the maximum generating capacity of 'up to 1000MW' from the current Section 36 Consent both to allow the additional grid capacity to be utilised, and avoid the potential need for further requests to increase the consented maximum generating capacity in the future.

An increase in generating capacity for the Inch Cape Wind Farm would be achieved through no change to the infrastructure than is already consented. Further to this it would contribute to the Scottish Government's targets for renewable energy generation with no increase in environmental impact.

This application seeks to remove the overall maximum generating capacity from the Section 36 Consent. ICOL currently has consent for a maximum generating capacity of 'up to 1000MW'.

As per ICOL's recent application (reference: ICO1-EC-OFC-003-RRP-RPT 001) to increase the overall generating capacity from 'around 700 MW' to 'up to 1GW' which received consent on the 16th of July, 2020, it was agreed that there was no pathway for additional

environmental impacts to exceed those assessed within the Inch Cape Offshore Wind Farm EIAR (ICOL 2018 EIAR). As ICOL is proposing to realise the increased generating capacity within the consented physical parameters outlined in the Section 36 Consent.

The Inch Cape Offshore Wind Farm EIAR (ICOL 2018) does not state the project will have a maximum generating capacity, however, a development of approximately 700MW was considered as a realistic scenario for the assessment of economic and social benefits. This scenario was based on the grid connection agreement at the time of submission, and that WTG rated to approximately 9.5MW would be available within the projected project timescales. It is now looking feasible that WTGs with ratings in excess of 15MW within the consented parameters may be available within project construction timescales, and ICOLs request would enable to ability to use of the latest WTGs models.

The maximum capacity of the wind farm has not been directly assessed in terms of Environmental Impact Assessment (EIA) and Habitats Regulations Appraisal (HRA) and has not underpinned assessments, which are based on physical parameters of the WTGs (as well as other infrastructure). Therefore, its removal from the Section 36 consent would still mean that ICOL could not install infrastructure larger than considered in the 2018 EIA and subsequently consented. Removal of the generating capacity would allow ICOL the flexibility to optimise renewable energy production, without resulting in an increase in impact than those assessed within the Environmental Impact Assessment Report (EIAR), HRA or used to inform the Appropriate Assessment which underpins the consent awarded.

The ability to generate greater output without increasing the environmental impact is a key driver for this request, and will help support Scottish and UK government climate change and renewable energy objectives.

### **Application to Vary**

Following the consent variation (048/0W/RRP-10, 16th July 2020)- S.36 Annex 1 'Description of the Development' of the decision notice now allows for the following:

*An offshore energy generating station, located in the outer Firth of Forth, approximately 15-22km east of the Angus coastline, as shown in Figure 1 below, with a maximum generating capacity of up to 1000 megawatts ("MW") comprising:*

*1. No more than 72 three-bladed horizontal axis Wind Turbine Generators ("WTGs"), each with:*

- a) A maximum height to blade tip of 291 metres (measured from Lowest Astronomical Tide ("LAT"));*
- b) A maximum rotor diameter of 250 metres;*
- c) A minimum blade tip clearance of 27.4 metres (measured from LAT);*
- d) A maximum blade width of 7.8 metres; and*
- e) A nominal turbine spacing of 1,278 metres.*

*2. No more than 72 substructures and foundations and ancillary equipment.*

*3. No more than 190km of inter-array cabling;*

*The total area within the Development site boundary is 150km<sup>2</sup>.*

ICOL requested, that references within Annex 1 of the current Section 36 consent are varied to remove reference to maximum generating capacity in its entirety.

The physical parameters of the turbine proposed will remain within the permitted turbine parameters granted within the Section 36 consents, and that assessed within the Environmental Impact Assessment (EIA) and Appropriate Assessment to inform the application. Therefore, the proposed variation does not result in any changes to these assessments for the consented development. As there are no significant adverse effects associated with the proposed change there is no requirement for a new EIA to be undertaken and the Section 36 consent can be varied with no further assessment required. Further information to support the variation request is provided in IC02-INT-EC-OFL-003-RRP-APP-002 Application Supporting Report.

Yours sincerely,

**Benjamin King**

**Offshore Consent Manager**

**[benjamin.king@inchcapewind.co.uk](mailto:benjamin.king@inchcapewind.co.uk)**