

[REDACTED]

From: [REDACTED]
Sent: 13 September 2018 20:20
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Forthwind - Variation proposals - scale and character of development

Dear [REDACTED],

I refer to your email below. You refer to ECU guidance on variations – I apologise but I have not been able to find any guidance which looks like it might be that.

The consented scheme is for 2 x 2 bladed turbines each with a capacity of up to 9MW, with a maximum hub height of 121 above LAT, and a maximum height of 198.5, with foundations, subsea cable and transformer, and associated infrastructure. The proposal is to add as an alternative: not more than 1 x 3 bladed turbine, with either lattice or tower structure, a maximum blade tip height of 260m, maximum rotor diameter of 220 and maximum hub height of 160m. The period of consent period would also increase.

We do not have the expertise within the Council to comment on biodiversity issues at present, and note that you have sought the advice of SNH. They will comment on consideration of impacts on the birdlife of the Firth of Forth and Forth Islands SPA, which is our main interest in biodiversity impacts of this proposal.

In terms of landscape and visual impacts, the new turbine is at some 60m higher than the consented scheme and of a different design. In terms of design, from experience with smaller turbines, three-bladed ones can look more substantial than two bladed ones. The turbine would look more similar to the existing turbine at Methil; this similarity of design could make the turbines appear as one from some viewpoints, rather than different schemes, and this would give the proposal a somewhat different character.

In terms of scale, an increase in height of around 60m is a substantial increase in proportion to the original scheme, adding around a quarter again of its original height. If this was a planning application, this Council would not be accept this as a non-material variation and would require a new application. In terms of visual impact, although the difference in scale does not appear to increase the areas with visibility within East Lothian substantially, there is an increase. It is also likely that where there is visibility, the turbine would be more noticeable as it is larger – this is noticeable from the viewpoint at Gullane, where the 3 bladed turbine appears as higher than the existing one at Methil, where the existing consented turbines are more similar in height. This would make it appear more obviously as the highest turbine in the area; though of a different design. It is not clear whether the 3 bladed taller turbine would be a better fit for the area or not; but it does look different. A further difference is that this is a single turbine while the consented position is for up to 2 turbines. The reduction in number does not necessarily compensate for the increase in height though.

The turbine is in the same location, and other infrastructure remains the same. The development will remain as having the character of wind development which is of large turbine but limited number, in the sea and in East Lothian's case, at a distance. Whether the application is for a variation or a new application, there will still be a requirement for consideration of Environmental Impact Assessment, which leads to a requirement for publicity and consultation.

Our main reservation about considering this as a variation is the alteration to the scale, which is considerable, as well as both increased visual impact and altered landscape and visual impact. However, if Marine Scotland consider that this can be dealt with by a variation we would accept this.

[REDACTED]
Planning Service Manager

Tel: [REDACTED]
Website: www.eastlothian.gov.uk/ldp

From: [REDACTED]
Sent: 03 September 2018 15:28
To: [REDACTED] marineenergy@snh.gov.uk; [REDACTED]
[REDACTED] Policy & Projects <policy&projects@eastlothian.gov.uk>;
[REDACTED] localdevelopmentplan@edinburgh.gov.uk; [REDACTED]
development.central@fife.gov.uk
Cc: [REDACTED]
Subject: Forthwind - Variation proposals - scale and character of development

Dear Sir/Madam,

Please find attached a [link](#) to documents submitted by Forthwind Ltd describing their consenting strategy and proposed changes. Please do not share further at this stage as the information could be considered sensitive. I would be grateful if you could confirm that you can access the documents.

MS-LOT are currently considering whether the changes proposed by Forthwind are appropriate to be considered as a variation to their current consent when considering the ECU guidance, particularly in terms of whether the changes would result in a project which was fundamentally different in terms of scale, character and environmental impacts when compared with the existing consent.

MS-LOT would find it helpful to understand your view on this, particularly in terms of scale and character. Could a response please be provided by 17th September 2018.

Please note that Forthwind have also provided a Scoping request as part of the submitted documentation and your views on this will be sought in due course and as a separate request.

Kind regards

[REDACTED]
[REDACTED]
Marine Renewables Casework Officer
Marine Scotland – Marine Policy and Planning
Scottish Government | Marine Laboratory| 375 Victoria Road | Aberdeen AB11 9DB
[REDACTED]
w: www.gov.scot/topics/marine/Licensing/marine

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sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh agus fios a leigeil chun neach a sgaoil am post-d gun dàil. Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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[REDACTED]

From: [REDACTED]
Sent: 20 September 2018 17:25
To: [REDACTED]
Cc: [REDACTED]
Subject: [PROTECT] Re: [PROTECT] RE: [PROTECT] RE: [PROTECT] RE: Forthwind - Variation proposals - scale and character of development

[REDACTED]

I can advise that we are unable to offer an opinion as to whether the proposed variation would represent a significant change in terms of visual impact as seen from CEC's area. As noted in relation to the separate, earlier proposal for a wider array, we would need to see information depicting the scheme from Calton Hill to be able advise further.

If you would like further input from CEC at this time, or would wish to discuss our response, please let me know.

Kind regards

[REDACTED]

Sent from my iPad

On 20 Sep 2018, at 15:57, [REDACTED] wrote:

Hi [REDACTED],

The advice from last year appears to relate to the proposed Forthwind Array, which involved installation of a further seven wind turbines in addition to the currently consented two.

The current proposals on which you have been consulted, and which Forthwind have given precedence over the Array, relate to proposed amendment of the current consent where Forthwind wish to retain the option of the two currently-consented turbines but include as an alternative installation option one larger three-bladed turbine.

Trusting this is of assistance.

Kind regards

[REDACTED]

From: [REDACTED]
Sent: 20 September 2018 14:54
To: [REDACTED]
Subject: [PROTECT] RE: [PROTECT] RE: [PROTECT] RE: Forthwind - Variation proposals - scale and character of development

[REDACTED]

We've checked the advice we gave to 2b Energy a year ago.

Is this for the same proposal?

Kind regards

[REDACTED]

From: [REDACTED]
Sent: 20 September 2018 13:28
To: [REDACTED]
Subject: RE: [PROTECT] RE: [PROTECT] RE: Forthwind - Variation proposals - scale and character of development

Hi [REDACTED],

Thanks for the update.

Kind regards
[REDACTED]

From: [REDACTED]
Sent: 20 September 2018 12:44
To: [REDACTED]
Cc: [REDACTED]
Subject: [PROTECT] RE: [PROTECT] RE: Forthwind - Variation proposals - scale and character of development

[REDACTED]
Apologies for delay in responding.

We're just checking any previous response made by CEC on this case. We're doing so today, and I hope to be able to reply today or tomorrow.

Kind regards

[REDACTED]
[REDACTED]
Development Plan Team | Place Directorate | The City of Edinburgh Council | Waverley Court, Level G:3, 4 East Market Street, Edinburgh, EH8 8BG | Tel. [REDACTED]

From: [REDACTED]
Sent: 19 September 2018 17:01
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: [PROTECT] RE: Forthwind - Variation proposals - scale and character of development

Dear [REDACTED]

As comments were requested by 17th September 2018 and having received an out of office reply from [REDACTED] could you advise if you are in a position to supply comments as per the request below?

Kind regards

[REDACTED]
Marine Renewables Casework Officer
Marine Scotland – Marine Policy and Planning
Scottish Government | Marine Laboratory| 375 Victoria Road | Aberdeen AB11 9DB
[REDACTED]

[Redacted]

w: www.gov.scot/Topics/marine/Licensing/marine

From: [Redacted]
Sent: 19 September 2018 16:53

To: [Redacted]
Cc: [Redacted]

Subject: RE: [PROTECT] RE: Forthwind - Variation proposals - scale and character of development

Dear [Redacted],

Further to the request below for Edinburgh City Council comments on Forthwind's proposals, can you advise if Edinburgh City Council will be submitting a response?

Kind regards
[Redacted]

[Redacted]
Marine Renewables Casework Officer
Marine Scotland – Marine Policy and Planning
Scottish Government | Marine Laboratory| 375 Victoria Road | Aberdeen AB11 9DB

[Redacted]

w: www.gov.scot/Topics/marine/Licensing/marine

From: [Redacted]
Sent: 03 September 2018 16:48

To: [Redacted]

Subject: [PROTECT] RE: Forthwind - Variation proposals - scale and character of development

Hi [Redacted]

I confirm receipt and have passed your email on to [Redacted]

Regards

[Redacted]

[Redacted] / Planning and Transport / Place Directorate / The City of
Edinburgh Council / Level G3 Waverley Court / 4 East Market Street / Edinburgh / EH8 8BG / [Redacted]
[Redacted] /
www.edinburgh.gov.uk

<image001.jpg>
The new home page for access to
eBuilding Standards and ePlanning services

From: [Redacted]
Sent: 03 September 2018 15:35
To: [Redacted]
Cc: [Redacted] Local Development Plan <LocalDevelopmentPlan@edinburgh.gov.uk>
Subject: FW: Forthwind - Variation proposals - scale and character of development

Good Afternoon [Redacted],

Please see as below as I received a bounce back from [REDACTED] . I would be grateful if you could confirm receipt.

Kind regards
[REDACTED]

From: [REDACTED]
Sent: 03 September 2018 15:28
To: [REDACTED]; marineenergy@snh.gov.uk; [REDACTED];
'policy&projects@eastlothian.gov.uk'
<policy&projects@eastlothian.gov.uk>; [REDACTED];
'localdevelopmentplan@edinburgh.gov.uk' <localdevelopmentplan@edinburgh.gov.uk>;
[REDACTED] development.central@fife.gov.uk
Cc: [REDACTED]
Subject: Forthwind - Variation proposals - scale and character of development

Dear Sir/Madam,

Please find attached a [link](#) to documents submitted by Forthwind Ltd describing their consenting strategy and proposed changes. Please do not share further at this stage as the information could be considered sensitive. I would be grateful if you could confirm that you can access the documents.

MS-LOT are currently considering whether the changes proposed by Forthwind are appropriate to be considered as a variation to their current consent when considering the ECU guidance, particularly in terms of whether the changes would result in a project which was fundamentally different in terms of scale, character and environmental impacts when compared with the existing consent.

MS-LOT would find it helpful to understand your view on this, particularly in terms of scale and character. Could a response please be provided by 17th September 2018.

Please note that Forthwind have also provided a Scoping request as part of the submitted documentation and your views on this will be sought in due course and as a separate request.

Kind regards
[REDACTED]

[REDACTED]
Marine Renewables Casework Officer
Marine Scotland – Marine Policy and Planning
Scottish Government | Marine Laboratory| 375 Victoria Road | Aberdeen AB11 9DB
[REDACTED]

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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[REDACTED]

From: [REDACTED]
Sent: 19 September 2018 12:33
To: [REDACTED]
Subject: 18/02600/PREAPP - Confidential Consultation on Potential Alteration to Forthwind Proposal, Leven Bay

[REDACTED],

Apologies for missing the 17th September deadline for comments.

Having consulted with colleagues, the consensus opinion is that, were this a planning application, the nature and scale of the potential alterations to the consented scheme would be such that a new planning application would be required.

You clearly have your own processes and framework for assessing proposals for Marine Licences however, so we await your decision and will carry out the usual consultations within Fife Council on any amended proposals that may emerge, whether that be as an amendment to the existing, or be a new, Marine Licence application.

Kind regards,

[REDACTED]

[REDACTED]

Development Management
Economy, Planning & Employability Services
Fife Council
Kingdom House
Kingdom Avenue
GLENROTHES
Fife
KY7 5LY

[REDACTED]

development.central@fife.gov.uk
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[REDACTED]
Licensing Operations Team
Marine Scotland
375 Victoria Road
Aberdeen
AB11 9DB

19 September 2018

FORTHWIND DEMONSTRATION PROJECT PHASE 1 - ECU GUIDANCE - ORNITHOLOGY REQUEST

Marine Scotland Science has reviewed the submitted documents and has provided the following comments.

Ornithology

The variation (two options) proposed are for a single WTG rather than the originally consented two. The single WTG would be placed at one of the two original locations, but would be larger and have three blades rather than two. Though the potential impact on ornithology receptor species of the single larger WTG would be expected to be greater than the original WTGs individually, the combined impact of the two consented WTGs would likely be greater than the variation designs. Thus, the variation is not expected to lead to greater impacts than previously assessed (in the 2016 AA). However, the age and quality of the data may need to be reviewed and a view taken on whether it is still adequate. If it were considered that a new application be required then this would provide an opportunity to update the ornithology assessment.

Hopefully these comments are helpful to you. If you wish to discuss any matters further contact the MSS Renewables in-box at MS_Renewables@gov.scot

Yours sincerely

[REDACTED]
[REDACTED]
Marine Scotland Science

[REDACTED]

From: [REDACTED]
Sent: 17 September 2018 12:06
To: [REDACTED]
Cc: [REDACTED] S Marine Renewables
Subject: Forthwind - Variation proposals - scale and character of development - SNH response
Attachments: 2018 09 17 - Forthwind variation - scale and character- SNH response.pdf

Dear [REDACTED]

Thank you for consulting SNH on the proposed changes to the Forthwind development. Please find our response attached.

Further to our comments within the response, we wish to highlight some concerns about the potential validity of the proposal as a demonstration project. The purpose of the Forthwind Offshore Demonstration Project as described in the original application and Environment Statement was to provide a facility *“to demonstrate a new model of offshore wind turbine, which will be used to generate clean electricity from a renewable source of energy, the wind”*. The technology demonstration character of the project is also reinforced by the limitations of the Forthwind seabed Agreement for Lease granted by the Crown Estate Scotland specifically for technology demonstration. This restricts Forthwind to only deploying offshore wind technology for demonstration purposes as defined within the lease.

Within the design envelope, the proposed changes include a more conventional large 3 bladed turbine with a standard tower design as an alternative to a lattice tower. This design is consistent with design / parameters for turbines currently being deployed in commercial offshore wind farm schemes. Should this design option be deployed, we would not consider that the proposed Forthwind project includes any particularly innovative approaches that may accord with its current status as a demonstration project.

We would find it useful to understand the current view of MS LOT and Crown Estate Scotland on the implications of the proposed changes for the Forthwind development to continue to be considered a demonstrator project, should a 3 bladed standard tower design be selected.

Please get in touch if you have any queries about our advice.

Regards,

[REDACTED]

[REDACTED] | **Marine energy and seaweed harvesting**
Scottish Natural Heritage | Battleby | Redgorton | Perth | PH1 3EW [REDACTED] | marineenergy@nature.scot
Dualchas Nàdair na h-Alba | Battleby | Ràth a Ghoirtein | Peairt | PH1 3EW
nature.scot – Connecting People and Nature in Scotland – [@nature_scot](https://twitter.com/nature_scot)

My email address has recently changed to: [REDACTED]

From: [REDACTED]
Sent: 03 September 2018 15:28
To: [REDACTED] MARINEENERGY; [REDACTED] policy&projects@eastlothian.gov.uk;
[REDACTED] ocaldevelopmentplan@edinburgh.gov.uk; [REDACTED]
[REDACTED] development.central@fife.gov.uk

Cc: [REDACTED]
Subject: Forthwind - Variation proposals - scale and character of development

Dear Sir/Madam,

Please find attached a [link](#) to documents submitted by Forthwind Ltd describing their consenting strategy and proposed changes. Please do not share further at this stage as the information could be considered sensitive. I would be grateful if you could confirm that you can access the documents.

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MS-LOT would find it helpful to understand your view on this, particularly in terms of scale and character. Could a response please be provided by **17th September 2018**.

Please note that Forthwind have also provided a Scoping request as part of the submitted documentation and your views on this will be sought in due course and as a separate request.

Kind regards

[REDACTED]
[REDACTED]
Marine Renewables Casework Officer
Marine Scotland – Marine Policy and Planning
Scottish Government | Marine Laboratory| 375 Victoria Road | Aberdeen AB11 9DB

[REDACTED]
w: www.gov.scot/Topics/marine/Licensing/marine

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Marine Scotland
Marine Laboratory
PO Box 101
375 Victoria Road
Aberdeen
AB11 9DB

Our ref: CNS/REN/OFFSHORE
WIND/FORTHWIND/GEN152374

Your ref:

Date: 17 September 2018

By email only:

ms.marinerenewables@gov.scot

Dear Sir/Madam,

FORTHWIND OFFSHORE WIND FARM VARIATION - 3 BLADED SINGLE TURBINE

Thank you for your consultation on the 3 September 2018 for the proposed variation for the Forthwind Offshore Wind Farm off the coast of Methil, Fife. You have sought our view on the whether the changes proposed by Forthwind are appropriate to be considered as a variation to their current consent or require a new consent application.

Our view is that the proposed changes are fundamentally different in terms of character and scale from what is currently consented. We consider that a new application should be required as a result of the proposed changes to the Forthwind development. Key changes include:

- Increase in scale; potential increase in turbine height in excess of 60m;
- Design change from 2 bladed lattice potentially to 3 bladed standard tower design;
- Increase in development duration from 20 to 25 years.

The recently consented variation to extend the operational life of the nearby onshore Levenmouth Demonstration Turbine from 5 years to 15 years is also a material consideration that has informed our advice. This development variation should be considered in cumulative / in-combination impacts for future Forthwind consent applications.

We have also recently provided advice in respect of ornithological impact assessment requirements and with the proposed changes to the development we consider that the ornithological impact assessment requires to be reconsidered. Our concerns relate to changes in assessment methods, age of data and differences in wind turbine parameters.

We hope this response is helpful. If you wish to clarify any of the points raised then please contact me [REDACTED].

Yours sincerely

[REDACTED]
[REDACTED]

Scottish Natural Heritage, Battleby, Redgorton, Perth, PH1 3EW.

[REDACTED]

[REDACTED]
www.nature.scot

