



Date: 14th September 2018

Ref: LF000009-ENV-MA-LTR-0001

Dr. Nicola Bain
Offshore Renewables Section Leader
Marine Scotland Licensing Operations Team
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Seagreen Wind Energy Limited
C/o SSE Renewables
1 Waterloo Street
Glasgow
G2 6AY

Dear Dr. Bain

Seagreen Wind Energy Limited
Project Alpha Offshore Wind Farm and Project Bravo Offshore Wind Farm
Applications for Marine Licences and Section 36 Consents

Seagreen Wind Energy Limited (Seagreen) is a joint venture between SSE Renewables Developments (UK) Limited and Fluor Limited, the UK operating arm of the Fluor Corporation.

Seagreen has been granted rights by The Crown Estate to develop offshore wind farms in the Firth of Forth Round 3 Zone. The Zone is being developed as a series of projects. The first projects to be developed are known as Project Alpha and Project Bravo (Seagreen Phase 1). Seagreen Alpha Wind Energy Limited (SAWEL) and Seagreen Bravo Wind Energy Limited (SBWEL) are the project companies for the two schemes. SAWEL and SBWEL are part of the Seagreen group of companies and wholly owned subsidiaries of Seagreen.

S36 and Marine Licences for Project Alpha and Project Bravo offshore wind farms were granted on 10 October 2014 and were varied on 28th August 2017 to remove the wind farm capacity limits. These consents are still extant. Seagreen is now seeking alternative consents for similar, but improved, designs of the offshore wind farm projects in the same sea area, termed 'the optimised Seagreen Project'. This allows Seagreen to take advantage of advances in turbine design and monopile construction since Project Alpha and Project Bravo were consented in 2014.

We enclose the following applications for the optimised Seagreen Project:

Applicant	Application	Project
SAWEL	Marine licence under s.20 of the Marine (Scotland) Act 2010 and ss. 65 and 66 of the Marine and Coastal Access Act 2009	Project Alpha
SBWEL	Marine licence under s.20 of the Marine (Scotland) Act 2010 and ss. 65 and 66 of the Marine and Coastal Access Act 2009	Project Bravo
SAWEL	Consent pursuant to s.36 of the Electricity Act 1989	Project Alpha
SBWEL	Consent pursuant to s.36 of the Electricity Act 1989	Project Bravo

The applications do not seek permission for dredging works. This will be applied for separately if required.

The Marine Licence for the Offshore Transmission Asset was granted on 10 October 2014 and is still extant. The Offshore Transmission Asset does not form part of the current applications for the optimised Seagreen Project.

The Onshore Transmission Connection is the subject of an extant planning permission under the Town and Country Planning (Scotland) Act 1997.

An Agreement for Lease with The Crown Estate (now Crown Estate Scotland) was secured on 12 October 2011, and later updated on 11 July 2014, for the seabed within the Project Alpha, Project Bravo and offshore Transmission Asset red line boundaries.

Subject of the Application

1. Wind Farms

The Project Alpha and Project Bravo offshore wind farm sites are located approximately 27km and 38km respectively from the Angus coastline.

These sites comprise:

- a) Up to 70 wind turbine generators in each, with a total number of 120 turbines across both projects;
- b) Subsea array cables;
- c) Up to three wave buoys each;
- d) Scour protection and cable protection (where appropriate);
- e) All foundations, substructures, fittings and cable crossings.

The projects will each exceed 50MW and therefore require consent under section 36 of the Electricity Act 1989. In accordance with discussions with MS-LOT no maximum capacity at either the project level or the WTG level is proposed. The expected total capacity for each project is approximately 750MW.

2. Section 36 Applications

The Generating Stations to which the Section 36 Consent applications relate comprise the wind turbine generators and inter-array cables forming part of the Project Alpha and Project Bravo Wind Farms. Section 36 consents are required for the operational life of the Wind Farms.

Offshore Transmission Asset Infrastructure

As noted, the proposed Offshore Transmission Asset received a Marine Licence dated 10 October 2014. The asset comprises a network of high voltage (circa 220 kilovolts ("kV") or above) subsea power cables providing inter connections between offshore substation platforms (OSPs), high voltage export cables from the offshore OSPs laid in up to six export cable trenches to a connection to the onshore infrastructure to Mean High Water Springs ("MHWS"), cable landfall at Carnoustie, and scour protection and cable protection where required. The Marine Licence includes all associated foundations, substructures, fixtures, fittings, fixings, protections and cable crossings.

Documentation Enclosed and Application Fee

Seagreen has been in correspondence with Marine Scotland since March 2018 regarding compliance with Marine Scotland's checklist for submission. The below list is understood to be a complete list of all required submission documents supporting the applications for the optimised Seagreen Project:

- a) EIA Report Non-Technical Summary (NTS);
- b) EIA Report Volume 1: Main text (including the Habitats Regulations Assessment (Chapter 16));
- c) EIA Report Volume II: Figures;

- d) EIA Report Volume III: Technical Appendices;
- e) Marine Licence application form for Project Alpha (Reference LF000009-ENV-MA-FRM-0002);
- f) Marine Licence application form for Project Bravo (Reference LF000009-ENV-MA-FRM-0001);
- g) Project location plan for Project Alpha (as per Section 6 of Marine Licence application form) and list of coordinates (Reference LF000009-ENV-MA-FGR-0002);
- h) Project location plan for Project Bravo (as per Section 6 of the Licence application form) and list of coordinates (Reference LF000009-ENV-MA-FGR -0004);
- i) Project location plan for Project Alpha in support of the s.36 application (Reference LF000009-ENV-MA-FGR-0001)
- j) Project location plan for Project Bravo in support of the s.36 application (Reference LF000009-ENV-MA-FGR-0003)
- k) Seagreen Phase 1 Offshore Applications List of Acronyms (Reference LF000009-ENV-MA-LST - 0001);
- l) Seagreen Phase 1 Offshore Applications List of Consultees (Reference LF000009-ENV-MA-LST- 0002);
- m) Seagreen Gap Analysis Spreadsheet (Reference LF000009-ENV-MA-ASS -0001); and
- n) Public Notice (Reference LF000009-ENV-MA-NTC -0001).

Application fees to the total of £211,220 covering the Section 36 Consent application and applications for the Marine Licenses for Project Alpha and Project Bravo will be paid to MS-LOT by BACS transfer.

Application Requirements

Navigational Risk Assessment

Chapter 12 of the EIA Report provides the information needed to enable the Scottish Ministers to undertake the process contained in s.36B of the 1989 Act regarding potential danger to navigation or impact on international shipping lanes.

Amenity Duties under the Electricity Act 1989

Prior to granting consent under Section 36 of the 1989 Act the Scottish Ministers must have regard to preserving natural beauty, conserving flora, fauna and geological and physiographical features of special interest.

The EIA Report contains the information required to enable the Scottish Ministers to have regard to these features and to allow them to comply with their statutory obligations.

Other Consents

Consents that may be required to support the development of the optimised Seagreen Project include a European Protected Species (EPS) Licence to permit the temporary disturbance of marine mammals, a dredging licence and unexploded ordnance (UXO) licence.

The EIA Report accompanying this application refers to the S36 consents and Marine Licences awarded in 2014 and the accompanying Environmental Statement. These extant consents are listed in the table below.

Applicant	Application	Project	Reference and/ or issue date
SAWEL	Marine licence under s.20 of the Marine (Scotland) Act 2010 and s. 65 and 66 of the Marine and Coastal Access Act 2009	Project Alpha	04676/14/0 10 October 2014 Varied 28 August 2018 04676/18/0

SBWEL	Marine licence under s.20 of the Marine (Scotland) Act 2010 and s.65 and 66 of the Marine and Coastal Access Act 2009	Project Bravo	04677/14/0 10 October 2014 Varied 28 August 2018 04677/18/0
SAWEL	Consent pursuant to s.36 of the Electricity Act 1989	Project Alpha	10 October 2014 Varied 28 August 2018
SBWEL	Consent pursuant to s.36 of the Electricity Act 1989	Project Bravo	10 October 2014 Varied 28 August 2018
SAWEL and SBWEL	Marine licence under s.20 of the Marine (Scotland) Act 2010 and s.65 and 66 of the Marine and Coastal Access Act 2009	Transmission Asset	04678/14/0 10 October 2014

Consultation

The consultations carried out with both statutory and non-statutory consultees are summarised in Chapter 6 'EIA Process', and are listed in more detail in each of the technical chapters (chapters 8 to 15) of the EIA Report.

The consent applications for the optimised Seagreen Project are not subject to a formal Pre-Application Consultation (PAC) process as the proposed wind farms lie wholly outside of the 12 nautical mile limit. Seagreen Wind Energy Limited has however carried out pre-application consultation as good practice. Accompanying this application is the Public Consultation Report which summarises the public consultations completed in 2018.

Optimised design and comparison with original scheme

The applications hereby submitted are for an optimised offshore wind farm design, which allows Seagreen to take advantage of advances in turbine design and monopile construction since Seagreen Alpha and Seagreen Bravo were consented in 2014.

Seagreen's aim has been to ensure that, wherever possible, the optimised design delivers wind farm projects that have effects which are no greater than those identified in the original design consented in October 2014. Chapter 17 'Summary of Impacts' of the EIA Report summarises the impacts from the Environmental Impact Assessments completed for the optimised Seagreen Project, as well as those from the originally consented projects.

Seagreen would request that proposed conditions for the potential consents for the optimised Project Alpha and Project Bravo projects are the subject of prior discussion before any consents are issued.

We look forward to receiving your formal acceptance of the Applications. If we can be of any further assistance in that regard, please do not hesitate to contact us.

Yours sincerely,

Heather Donald
Lead Consents Manager For and on behalf of
Seagreen Wind Energy Limited