

East Lothian Council

Our Ref: CONS/GOV/Forthwind 2024
Your Ref: SCR-0072

Date: date as email

Monica Patterson
EXECUTIVE DIRECTOR
(SERVICES FOR COMMUNITIES)

Via email to ms.marinerenewables@gov.scot

John Muir House
Haddington
East Lothian
EH41 3HA
Tel 01620 827827
Fax 01620 824295

Dear Sir/Madam,

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (“the MW Regulations”)

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (“the EW Regulations”)

CONSULTATION UNDER PART 2, REGULATION 10(5) OF THE MW REGULATIONS AND PART 2, REGULATION 8(5) OF THE EW REGULATIONS.

I refer to your email of 16 February seeking our views on the above, and apologise for our delayed response.

The Screening Request concerns a proposed variation to a single turbine proposal given consent in March 2023. The consented application was subject to Environmental Impact Assessment. The variation applies only to the turbine itself, and seeks to change the parameters of the turbine as shown in Table 3.1 of the Screening Request, reproduced below.

Table 3.1 The proposed parameter changes, parameters in bold highlight the changes from the Consented Development

Change	Parameters	Consented turbine	Variation turbine
Increased size of rotor diameter and associated parameters	No. blades	3	3
	Rotor radius (m)	127.5	140
	Rotor diameter (m)	255	280
	Air gap (blade tip clearance; m)	25	25
	Height to blade tip (m)	280	305
	Hub height (m)	156	181

There will be an increase to rotor radius and diameter, and a resulting increase in the height to blade tip and hub of 25m in both cases. No other changes are sought through this Screening Request.

Landscape and visual

As noted in our response to consultation on the original proposal, although the proposed turbine will have some adverse impact on views to and from East Lothian, the council did not consider these to be significant. The variation will slightly increase the visual impact of the proposal from places where it could be seen previously and is also likely to increase places it can be seen from. No ZTV information showing which areas would now have visibility, of either blade tip or hub, but previously didn't, has been submitted. This would have been useful.

The effect of the proposal will also presumably be to raise the height of any installed aviation lighting, as this is usually installed on the hub. The council previously requested conditions on aviation lighting including setting a maximum candela level as well as a minimum; for 'dipping' the lighting when conditions allow, and for aviation lighting to be kept under review and removed if no longer needed.

The condition imposed on consent required a Lighting and Marking Plan to be submitted to Scottish Ministers for their approval, and the turbine to be lit thereafter in accordance with this. This was to have been copied to Fife and Edinburgh Councils, though not this council, and we do not have any information on what (if anything) has been agreed. However, given the increase in height is of only 25m, we expect the impact would not be significant in terms of requiring EIA, for interests in East Lothian. We would appreciate that the information on increased visibility of hubs (and therefore aviation lighting) being provided at the application stage however.

Biodiversity

The Council values its birdlife, including that of the Firth of Forth SPA, the Forth Islands SPA and offshore, and Outer Firth of Forth and St Andrews Bay Complex SPA. It also values the marine mammals which are visitors to the East Lothian coast, including those from the nearby Isle of May SAC and further afield Moray Firth SAC. There is legislative provision for the protection of such sites and some such species. The Council does not have expertise as to whether the proposal would have a significant effect on these interests, but would support the views of NatureScot on this matter.

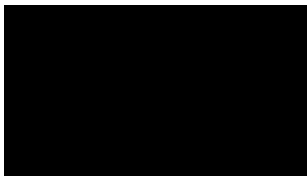
Climate

The Screening Report does not appear to give figures for proposed scheme in comparison with the original in terms of greenhouse gas emissions. As we noted in our response to the application, the IEMA approach is to compare projects of the same type. We therefore cannot comment on the significance of this aspect but would expect Marine Scotland to take it into consideration.

In conclusion we do not consider the variation to require EIA for interests in East Lothian, unless NatureScot advise that this is required for biodiversity interests within their remit which affect our area. If they do so, we would also request EIA in line with their advice.

If you would like to discuss the contents of this letter further, please contact J Squires on 01620 827370, or via email to jsquires@eastlothian.gov.uk

Yours sincerely,



Keith Dingwall
Planning Service Manager

Fife Council

From: [Martin McGroarty](#)
To: [MD Marine Renewables](#)
Cc: [Development Central](#); [Mary J Stewart](#)
Subject: Re: 24/00416/CON - FW: SCR-0072 - Forthwind Demonstration Project - S36 consent variation - Methil, Fife
Date: 18 March 2024 16:49:36
Attachments: [Outlook-A picture .png](#)
[Outlook-A picture .png](#)

FAO Kate

Consultation on request for a screening opinion

Good afternoon.

I refer to your email dated 11th March 2024 regarding the above, and apologise for missing the deadline date for responses of 8th March 2024.

The Planning Service workload is extremely high at present and I regret, therefore, that I am unable to give you a formal screening opinion on the proposed variation to the Section 36 consent.

However, as the Planning case officer most closely associated with the progress of the Forthwind Demonstrator project through the years, I can offer the following comments.

Fife Council has been clear throughout the development of this project that the key environmental impact likely to be raised by this development was the visual impact of the turbine, as stated in our previous responses to Marine Scotland and the developer. We therefore welcomed the initial decisions to change the project from 2, two-bladed, turbines to 1, three-bladed, turbine (even though the single turbine was larger) on the basis that it would read much better in the landscape/seascape.

In terms of the proposed variation to the dimensions of the turbine, and given the distance out from the Methil shore and the general lack of reference points in the seascape against which to judge it, it is considered that a 25m increase in rotor diameter, nacelle height, and blade tip height is relatively modest, and is likely to have very little impact on the level of visual impact arising from the Forthwind Demonstrator turbine.

My initial view is that the proposed variation would be unlikely to require an EIA in its own right.

I trust that these comments are helpful.

Kind regards,
Martin

Martin McGroarty
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Historic Environment Scotland



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By email to:

MD.MarineRenewables@gov.scot

Marine Directorate (Marine Renewables)
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300024638
Your ref: SCR-0072

15 March 2024

Dear Marine Directorate

[The Marine Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017 SCR-0072 - Forthwind Demonstration Project - Section 36 consent variation - Methil, Fife Request for Screening Opinion](#)

Thank you for your consultation which we received on 16 February 2024 seeking our comments on an Environmental Impact Assessment (EIA) screening opinion for the above proposed development. This letter contains our comments for our historic environment interests. That is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, gardens and designed landscapes and battlefields on their respective Inventories.

Your archaeological and conservation advisors will also be able to offer advice for their interests. This may include unscheduled archaeology, category B- and C-listed buildings and conservation areas.

Our Screening opinion

We understand that the screening relates to a proposed variation to the current S.36 Electricity Act consent for a demonstration Offshore Wind Farm in the Firth of Forth. The proposed variation will increase the height of the demonstration turbine by 25m from 255m to 280m.

From the information provided we are content that the proposed variation would not result in significant impacts on our interests. We therefore have no further comments in relation the proposals.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Sam Fox and they can be contacted by phone on 0131 668 6890 or by email on samuel.fox@hes.scot.

Yours faithfully

Historic Environment Scotland

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**

NatureScot

From: [Malcolm Fraser](#)
To: [MD Marine Renewables](#)
Subject: RE: SCR-0072 - Forthwind Demonstration Project - Section 36 consent variation - Methil, Fife - Consultation on request for a screening opinion - Response required by 08 March 2024
Date: 07 March 2024 09:33:03
Attachments: [image001.png](#)
[image002.png](#)

Kate –

Thank you for consulting us on this Request for an EIA Screening Opinion, relating to a variation to the previously consented Forthwind Demonstration Project.

Proposal

We have reviewed the document supplied by the applicant:

- Forthwind Offshore Demonstration Site, Methil, Fife – Section 36C Consent and Marine Licence – Variation Screening Request (dated January 2024)

The Variation Screening Request states the following:

- The variation will "Increase rotor diameter by 25m, to 280m, which also affects rotor radius, blade tip height, and hub height parameters";
- "All other turbine parameters and other offshore project elements remain the same as for the Consented Development";
- "An assessment ... has been undertaken in respect of seascape, landscape, and visual impacts, as well as shadow flicker"; and
- "For all other receptors ... the proposed variation does not result in any change to the conclusions on impact significance either under environmental Impact Assessment (EIA) or Habitats Regulations Appraisal (HRA)."

NatureScot advice - SLVIA

The proposed increase in height may lead to an intensification of effects [compared to the consented development], and there may be changes to the cumulative baseline. However, we advise that we are content this does not trigger the need for an accompanying EIAR for the variation application in this instance.

NatureScot advice – offshore ornithology, marine mammals, fish and shellfish, benthic ecology

For each receptor, Table 4.1 of the Variation Screening Report reviews:

- the impacts assessed for the consented development;
- the effects predicted in the Consented Development (in other words - the previous conclusion reached on significance); and
- implication of the proposed design refinements (i.e. any changes arising from the proposed variation).

For each of these receptors the previous conclusions were that impacts are not significant. Similarly, for each receptor the changes arising from the proposed variation do not change the previous conclusions.

NatureScot advice – EIA Screening

We do not consider there is a requirement for this variation to be accompanied by an EIA, and

we accept the considerations put forward by the applicant. We request that the information provided as part of this consultation i.e. the SLVIA and shadow flicker assessments are provided as part of the variation application.

We also note that the applicant remains committed to the mitigation and monitoring requirements that were secured for the consented development, specifically including post-consent monitoring of seaduck and diver displacement. We take this opportunity to enquire whether any pre-construction ornithological monitoring has been planned or has commenced?

We hope this advice is clear.

--

Malcolm Fraser (he/ him) | **Marine Sustainability Adviser**

NatureScot | malcolm.fraser@nature.scot | 0131 316 2629

nature.scot | [@naturescot](https://twitter.com/naturescot) | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

**Scottish Environment Protection
Agency**

From: [Planning South](#)
To: [MD Marine Renewables](#)
Subject: PCS-20000551 SEPA Response to SCR-0072
Date: 19 February 2024 08:38:07
Attachments: [image.png](#)

To Whom It May Concern,

Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Forthwind Demonstration Project - Section 36 consent variation, Methil, Fife

Thank you for the above consultation. Based on the information provided, it appears that this application falls below the thresholds for which SEPA provide site specific advice. Please refer to our standing advice and other guidance which is available on our [website](#). In addition, please refer to our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations available [here](#) (which also covers EIA consultations).

I trust these comments are of assistance - please do not hesitate to contact me if you require any further information.

Kind regards,

Simon Watt
Senior Planning Officer



For the future of our environment

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Ghobhainn, 6 Craobhraid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1 4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghlèidheadh agus airson adhbharan laghail eile.