

MORAY EAST OFFSHORE WINDFARM

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BY EMAIL

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Dear Ms Bain

Telford Offshore Wind Farm - Section 36 Consent Variation Request
Stevenson Offshore Wind Farm - Section 36 Consent Variation Request
MacColl Offshore Wind Farm - Section 36 Consent Variation Request
Moray Offshore Windfarm (East) Limited ("Moray East")

I write on behalf of Telford Offshore Windfarm Limited, Stevenson Offshore Windfarm Limited and MacColl Offshore Windfarm Limited (together "the wind farm companies") to apply for a variation of the Section 36 consents awarded for the Telford, Stevenson and MacColl Offshore Wind Farms on 19 March 2014. Moray East owns 100% of the wind farm companies.

Background

Annex 1 of the Section 36 consents for the Telford, Stevenson and MacColl Wind Farms states the following:

"DESCRIPTION OF THE DEVELOPMENT

The Development, located as shown on Figure 1 below, shall have a permitted generating capacity not exceeding 372 MW and shall comprise a wind-powered electricity generating station in the Outer Moray Firth, including:

1. *not more than 62 three-bladed horizontal axis wind turbine generators each with:*
 - a. *a maximum blade tip height of 204 metres;*
 - b. *a rotor diameter of between 150 and 172 metres;*
 - c. *a minimum crosswind spacing of 1,050 metres; and*
 - d. *a minimum downwind spacing of 1,200 metres;*
2. *all foundations, substructures, fixtures, fittings, fixings, and protections;*
3. *inter array cabling and cables up to and onto the offshore substation platforms; and*
4. *transition pieces including access ladders / fences and landing platforms,*

all as specified in the Application and by the conditions imposed by the Scottish Ministers. References to "the Development" in this consent shall be construed accordingly."

MORAY EAST OFFSHORE WINDFARM

Condition 7 for each of the three consents also states the following:

“The Development must be constructed and operated in accordance with the terms of the Application and related documents, including the accompanying ES, the Additional Ornithological Information and Annex 1 of this letter, except in so far as amended by the terms of this section 36 consent.”

Although not specified in the Section 36 consents it is considered that the consent was awarded for turbines between 6 MW and 8 MW rated capacity as detailed in both the Environmental Statement which accompanied the Section 36 consent applications and as further set out in section 2.2 “Description of the Works” in the Marine Licence for each of the wind farms and used in the calculations supporting the Appropriate Assessment.

Application to vary

The wind farm companies now request that the respective Section 36 consents are varied to permit the use of higher rated wind turbines – up to 10 MW. It is proposed that Condition 7 of each of the Section 36 consents is varied to refer to the variation documentation. For the full details of the proposed variation reference is made to the “Offshore Consents Variations Application Report - Telford, Stevenson and MacColl Offshore Wind Farms” which accompanies this application (Application Report). Appendix 2 of the Application Report sets out the precise variations sought in respect of each of the Section 36 consents.

This change in turbine rated capacity results from an improvement in the wind turbine technology. Due to this improved efficiency of wind turbines which can capture more energy from the wind without changing any of the assessed physical parameter means that the maximum capacity per string within each wind farm (from 36 MW to up to 80 MW) will also increase. This is not a parameter used in any of the environmental assessments.

Finally, a variation of the maximum capacity from 372 MW to 500 MW for the MacColl Offshore Wind Farm as stated in Annex 1 of its Section 36 consent is sought. However, the Application Report confirms that the holder of the Section 36 consent in respect of the MacColl Offshore Wind farm is responsible for ensuring that the maximum installed capacity in MacColl can only exceed 372 MW where the overall maximum total installed capacity of the Telford, Stevenson and MacColl will not exceed 1,116 MW. The Application Report is expressly included within the proposed variation of condition 7 in respect of MacColl and through this mechanism the obligation outlined above would become binding on the holder of the MacColl Section 36 consent. The maximum number of turbines for each of the Telford, Stevenson and MacColl Offshore Wind Farms will remain within the consented parameters.

The physical parameters of the turbine proposed to be used remain within the permitted turbine parameters under the current Section 36 consents, i.e. there are no changes to the physical turbine parameters assessed as part of the original applications and the maximum number of turbines remains the same as consented. Therefore the proposed variation does not result in any changes to the environmental impacts assessed for the consented wind farms (see also Appendix 4 of the Application Report setting out the conclusions of Moray East’s Ecological Clerk of Works).

MORAY EAST OFFSHORE WINDFARM

Further information is provided below on how the variation requests would relate to the existing consents:

Parameter	Telford, Stevenson and MacColl Section 36 consents	Telford, Stevenson and MacColl Section 36 consents variations
Maximum wind farm capacity	Overall Moray East site (area of Telford, Stevenson and MacColl wind farms) – 1,116 MW <ul style="list-style-type: none"> • Telford Offshore Wind Farm - 372 MW; • Stevenson Offshore Wind Farm – 372 MW; • MacColl Offshore Wind Farm – 372 MW; 	Overall Moray East site (area of Telford, Stevenson and MacColl wind farms) – 1,116 MW – as consented <ul style="list-style-type: none"> • Telford Offshore Wind Farm - 372 MW – as consented; • Stevenson Offshore Wind Farm - 372 MW – as consented; • MacColl Offshore Wind Farm - 500 MW – Variation Required;
Wind turbine nominal rated capacity	6 to 8 MW	Up to 10 MW – Variation Required
Maximum number of turbines	<ul style="list-style-type: none"> • 6 MW turbines – 186 (62 per wind farm) • 7 & 8 MW turbines – 159 (53 per wind farm) 	159 (53 per wind farm) – as consented (as per 7/8 MW turbine parameters)
Maximum turbine tip height	204 m	204 m – as consented (as per 7/8 MW turbine parameters)
Maximum rotor diameter	172 m (7/8 MW turbines)	172 m – as consented (as per 7/8 MW turbine parameters)
Maximum blade width	5.8 m	5.8 m – as consented (as per 7/8 MW turbine parameters)
Rotor speed	4.25 to 12.8 rpm (7/8 MW turbines)	4.25 to 12.8 rpm – as consented (as per 7/8 W turbine parameters)
Minimum air draft (HAT)	22 m	22 m – as consented

If consent is granted for this application to vary the Section 36 consents then it is noted that the Scottish Ministers may consider exercising their discretion to vary the Marine Licences granted in respect of the wind farms to reflect the changes proposed by the variation application. Appendix 3 of the Application Report provides an overview of the potential implications of the changes to the Section 36 consents for the Marine Licences.

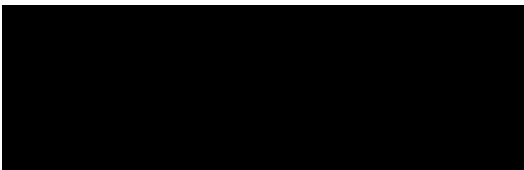
MORAY EAST OFFSHORE WINDFARM

Summary

The wind farm companies request the variations in the terms set out in the Appendix 2 of the enclosed Application Report are granted to allow higher rated capacity wind turbines to be installed within the Telford, Stevenson and MacColl offshore wind farm sites (see Appendix 1 of the Application Report), that the maximum capacity per string can be increased and that the maximum installed capacity at the MacColl Offshore Wind Farm is amended to up to 500 MW.

These variation requests are based on the fact that there are no proposed amendments to any of the assessed turbine physical parameters and therefore the predicted impacts remain as per consented wind farms and therefore the conclusions of the Environmental Impact Assessments (EIA) and Appropriate Assessment remain valid as highlighted within the attached "Offshore Consents Variations Application Report - Telford, Stevenson and MacColl Offshore Wind Farms". Therefore, the wind farm companies also request confirmation from Marine Scotland Licencing and Operations Team on behalf of the Scottish Ministers that in terms of Schedule 2 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 no significant adverse effects on the environment arise from the changes proposed and accordingly there is no requirement for a new EIA to be undertaken and that the Section 36 consents can be varied accordingly with no further assessment required.

Yours sincerely



Sarah Pirie
Head of Development

Enc. "Offshore Consents Variations Application Report - Telford, Stevenson and MacColl Offshore Wind Farms", December 2017