Representations (Batch One)

Angus Council

From:	**[Redacted**
To:	MD Marine Renewables
Subject:	00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date:	20 May 2026 10:02:45

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Generating Stations (Applications for Variation of Consent) (Scotland) Regulations 2013
MARINE AND COASTAL ACCESS ACT 2009
MARINE (SCOTLAND) ACT 2010
00013351 / 00013352 / 00013352 - Berwick Bank Wind Farm Limited - Berwick Bank Wind Farm – Section 36 Consent and Marine Licence Variations – Phasing Variation

I write in response to the above consultation and can confirm that Angus Council has no comments to make in relation to the requested variations

Regards,

[Redacted]

[Redacted] | Planning Officer (Development Standards) | Angus Council | 01307 492125 | **[R]** | www.angus.gov.uk

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Northern Lighthouse Board

Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: 0131 473 3100
Fax: 0131 220 2093

Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: Berwick Bank OWF – S36 & ML Variation
Our Ref: AL/OPS/ML/WIND_020_26

Licensing Operations Team – Marine Directorate
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

11 May 2026

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Ltd – Berwick Bank Wind Farm – Section 36 Consent & Marine Licence Variations – Phasing Variation

Thank you for your e-mail correspondence dated 7th May 2026 relating to the application submitted by **Berwick Bank Wind Farm Ltd** for a variation to the existing Section 36 Consent and Marine Licences for the construction and operation of the Berwick Bank Wind Farm.

Northern Lighthouse Board note that the main purpose of the variation is to allow for a phased approach to be adopted to the construction and operation of Berwick Bank Wind Farm, as opposed to the development as a single site.

It is recognised within the Covering Letter for the variation application that this phased approach to the development will require adaptation of Post-Consent Plans, such as the Lighting and Marking Plan (LMP) and Navigational Safety & Vessel Management Plan (NSVMP), and for flexibility to be included within these documents to allow the successful sequential build-out of the phases.

Northern Lighthouse Board have no objection to the proposed variation, and request that the applicant engages early with NLB with regard to the sequencing of the build-out, and also for the development of Post-Consent documentation that will be impacted by this phased approach such as the LMP.

Yours sincerely
[Redacted]

[Redacted]
Navigation Manager

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Northumberland County Council

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Wind farm - Section 36 Consent and Marine Licence Variations - Phasing Variation
Date: 20 May 2026 10:58:19

Dear Sir or Madam

Berwick Bank Wind farm - Section 36 Consent and Marine Licence Variations - Phasing Variation

Thank you for providing Northumberland County Council with an opportunity to comment on the above. I am writing to confirm that we have no comments to make.

Yours sincerely

[Redacted]

Senior Planning Officer
Planning Services - Policy Team
Northumberland County Council
County Hall
Morpeth
Northumberland
NE61 2EF

[Redact

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Northumberland
County Council

Marine Directorate - Licensing Operations Team
The Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

Planning Ref: 26/01631/CNA
Your Ref:
Contact: [Redacted]
Direct Line: [Redacted]
E-Mail: [Redacted]
Date: 21st May 2026

Dear Sir/Madam,

TOWN & COUNTRY PLANNING ACT 1990
Town and Country Planning (Development Management Procedure) (England) Order 2015

Proposal 00013351 / 00013352 / 00013352 - Section 36 Consent and Marine Licence Variations - Phasing Variation. Variation request to Allow for the discharge of conditions for each proposed phase of the Development of the Berwick Bank Wind Farm, as opposed to the development as a whole and; to correct discrepancies in the co-ordinates included in the offshore transmission infrastructure (part 1) and offshore transmission infrastructure (part 2) marine licences.

Location Berwick Bank Wind Farm

Applicant Marine Directorate - Licensing Operations Team The Scottish Government

I would confirm that Development Management have **No Objection** to the above consultation.

Yours Faithfully

[Redacted]

Planning Officer

From:	[Redacte
To:	MD Marine Renewables
Cc:	[Redacted]
Subject:	re: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date:	08 May 2026 16:12:54

The Environmental Protection Team at Northumberland County Council have no comments or recommendations to make in respect of these Section 36 Consent and Marine Licence Variations:

- Allow for the discharge of conditions for each proposed phase of the Development of the Berwick Bank Wind Farm, as opposed to the development as a whole and;
- To correct discrepancies in the co-ordinates included in the offshore transmission infrastructure (part 1) and offshore transmission infrastructure (part 2) marine licences.

Regards

[Redac
tedl

Northumberland County Council

[Redacted]

Environmental Protection Officer
Environmental Protection Team
Public Protection Service
Northumberland County Council
West Hartford Business Park
Cramlington
Northumberland
NE23 3JP

Mobile: [Redacted]
Fax: 01670 626059
E-mail: [Redacted]
Web: www.northumberland.gov.uk

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Historic Environment Scotland

From:	[Redacted]
To:	MD Marine Renewables
Subject:	RE: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date:	14 May 2026 09:49:55
Attachments:	image003.png image004.png image005.png image006.png image007.png image008.png

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Thank you for your consultation about the S36 Consent and Marine Licence Variations for the Berwick Bank Wind Farm.

We are content that these variations will not have any impacts on our interests and therefore have no comments to make.

Best wishes

[Redacted] **| Senior Planning, Consents and Advice Officer**
Historic Environment Scotland | Ã€rainneachd Eachdraidheil Alba
Longmore House, Salisbury Place, Edinburgh, EH9 1SH
[Redacted]

Pronouns: she/her
www.historicenvironment.scot
I am sending this email at a time that suits me - I do not expect a response outside normal working hours. I do not normally work on Wednesdays.

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

RYA

From: [Redacte
To: MD Marine Renewables
Subject: RE: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date: 13 May 2026 17:15:48
Attachments: image003.png
image004.png
image001.png

Hi,

I write to inform you that RYA Scotland has no objections to this application

Kind Regards

[Reda
d]
[Redacted]
Head of Business Support
RYA Scotland Safeguarding Lead

Royal Yachting Association Scotland
Mobile: [Redacted]
E: [Redacted]
Office number: 0131 202 4985

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Dundee City Council

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	RE: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date:	12 May 2026 15:02:08
Attachments:	image001.png image002.png

Good afternoon

I can confirm that Dundee City Council have no comments to make on the proposed variation.

Kind Regards

[Redacted]

[Redacted]

Principal Planning Officer (Planning & Economic Development) at Dundee City Council

E **[Redacted]**

P 01382 434457

W www.dundeecity.gov.uk

A Dundee House, 50 North Lindsay Street, DUNDEE, DD1 1QE

SEPA

From:	Planning South
To:	MD Marine Licensing
Subject:	PCS-20008773 SEPA Response to
Date:	20 May 2026 11:08:51
Attachments:	image.png

To Whom It May Concern,

Electricity Act 1989 - Section 36
Section 36 Consent and Marine Licence Variations - Phasing Variation
Berwick Bank Wind Farm

We have no objection to the proposed phasing variation.

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

Kind regards,

[Redacted]

Senior Planning Officer

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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk. Togalach Aonghais Mhic a' 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.

Representations
Batch Two

Member of the Public
1 - 79

From: [Redacted]
To: MD Marine Renewables
Cc: me
Subject: Berwick bank wind farm objection
Date: 25 May 2026 18:20:06

Dear Marine Directorate Licensing Team,

I am writing to formally object to the proposed variation of consent and marine licence conditions for the Berwick Bank Offshore Wind Farm.

I am extremely concerned by the proposal to allow discharge of seabird mitigation conditions in phases rather than requiring a complete and fully scrutinised mitigation strategy for the development as a whole before construction proceeds.

The original consent conditions were imposed for a clear reason: the Berwick Bank development presents potentially severe impacts on internationally important seabird populations in the Firth of Forth and along the east coast of Scotland. Species such as kittiwakes, puffins, razorbills, guillemots and gannets are already under significant environmental pressure and population decline. Weakening or fragmenting these protections risks undermining the integrity of the original consent process.

Allowing phased discharge of conditions appears to reduce transparency and accountability by enabling elements of the development to proceed before there is certainty that adequate mitigation exists for the project in its entirety. This creates the risk of cumulative environmental impacts being underestimated or inadequately addressed.

I am also concerned that changing the conditions after consent has been granted sets a troubling precedent whereby major infrastructure developers may seek to dilute environmental safeguards once approval has already been secured.

Given the scale of this development and the recognised ecological sensitivity of the area, precautionary principles should apply. No part of the development should proceed until:

- a complete seabird mitigation strategy has been independently assessed,
- cumulative impacts have been fully evaluated,
- and robust, enforceable protections are in place for the lifetime of the project.

I urge Scottish Ministers to reject this variation application unless and until comprehensive evidence demonstrates beyond reasonable doubt that internationally important seabird populations and marine ecosystems will not be adversely affected.

Yours faithfully,

[Redacted]

Sent from AOL on Android

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Off Shore Windfarm Phased in consent
Date: 28 May 2026 16:19:24
Attachments: Screenshot (337).png

Dear Sr/Madam.

Please find below the objections and request for a full public enquiry regarding SSE Developers plans for an Offshore Windfarm at Berwick Bank.

It appears that the above developer has no substantial and constructive plan for seabird and marine protection regarding the above development.
It now appears that they want to phase in various infrastructure.The Scottish Government was clear that no work,of any type can begin until this
protection order is substantiated.
It appears they never had a forward plan to begin with,or if they had it was taken on the assumption that they would be given approval regardless
of any consent by the Scottish Government.
However, the enviornmental impact assessment has changed since this was imposed originally.

The whole plan was consented on the whole site,not parts and the impact would be similar.
It appears that the original safeguards are being removed..

The project should be assessed as a whole development as the outcome and impact would have the same outcome.

Another thing which is disturbing is that when consent was given the Berwick Bank windfarm was discussed.However ther are now other major
problems which need assessed,these are below.

This developer has other ongoing developments and proposals in the North Sea which will have multiple impacs on marine life and seabird life.
The current map shows various windfarms stretching from north of Scotland right down the east coast,not to mention Nort England.

As can be imagined this will result in a huge if not near extinction level for some sea birds just recovering from avian flu.Foraging grounds are now
uner a greater impact and this was not investigated fully when consent was given and needs refusal.
Also the security and military threats have incresed since approval was given,a pause needs to be given until this is resolved.

Also the huge amount of jobs promised will not be forthcoming as the Government has paused production on security reasons in Scotland.

I would support a full public enquiry regarding the above as i feel conditions and situations have changed and now needs reassessing before any
final decisions are looked at,and the whole site be reavaluated or refused. Relocaton away from the original site is because this developer has so many sites
I feel this will start a dangerous precedent for future development and it all appears the location is easy for them,no one else.

I hope my above concerns will be looked at in due course,and along with many others a statement will be forthcoming. Many thanks for allowing me
to voice my concerns on this matter. **[Redacted]**

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Wind Farm
Date: 28 May 2026 18:44:38

I object to the proposed phasing variation for the Berwick Bank wind farm.

To whom it may concern

I am concerned that splitting this substantial project into smaller phases reduces proper scrutiny of the full environmental and cumulative impacts, especially for seabirds and the marine environment.

The project should continue to be assessed as a whole, scoping, construction and the operating of the turbines, not in separate stages.

How is it possible to mitigate for the destruction of so many seabirds? The Seabird Compensation Plan needs to be looked at in its entirety, not in piecemeal. The cumulative impact is important.

The Environmental Impact Assessment is no longer valid, and neither are the reports and data models that are being presented.

It would appear that the original safeguards have now been diluted and the amount of public consultation has been woeful.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made. The potential impact of this is too huge to ignore. It is an enormous area to destroy environmentally.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank
Date: 31 May 2026 15:04:07

Please consider this email as an objection to the proposed phasing variation for the Berwick Bank wind farm.

This appears to be an attempt to dilute the cumulative impact of the plan which may not be properly considered or controlled if phased. It is vital that the project should be assessed as a whole, not in separate stages.

I strongly believe that the request to vary application should be refused and that a public inquiry is held into the proposal

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Marine Licence Variation Application - Phasing – Berwick Bank Wind Farm - 00012119, 00012120, 00012121
Date: 30 May 2026 12:49:39

I am writing to object to the proposed phasing variation for the Berwick Bank wind farm.
I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.
The project should continue to be assessed as a whole, not in separate stages and conditions of planning need to be met prior to any construction or land based infrastructure taking place. The environmental impact of the land based infrastructure also needs to be taken into account when assessing the application.
Furthermore, I believe that the cumulative effect of the windfarms that are already being built in close proximity to this area has not been taken into consideration at any stage of the planning application process. The Seabird Compensation Plan needs to be looked at in its entirety - not in phases. The cumulative impact is important (to prevent displacement). NGOs such as the RSPB, National Trust for Scotland, Marine Conservation Society, Scottish Wildlife Trust and The Scottish Seabird Centre should all be part of the consultation process and also to ensure that the Seabird Compensation plan is met. The project was consented as an integrated whole - not in phases. The cumulative impacts may no longer be properly controlled, the impact on the seabirds and marine life must take priority. If this is approved it will weaken any safeguards already in place. The reports and data models are no longer valid. There has been next to know public consultations and this application notice was incredibly difficult to find and I feel this is deliberate by the applicants.
Berwick Bank will be an environmental disaster having a huge impact on biodiversity, particularly the already declining seabird population and endangered species such as kittiwakes, puffin, black backed gull, 70% of seabirds are already in decline. Even Nature Scot said the devastation it would cause is, "unacceptable". Berwick Bank would be near internationally important seabird colonies off Scotland’s east coast. If it is built, this development could become the single deadliest windfarm in the world for birds. Scientists predict it could kill tens of thousands of endangered seabirds over its lifetime. This could lead to the extinction of some of our seabird species.
I request that the variation application is refused, or that a full reassessment that includes all the cumulative impacts in consultation with the NGOs mentioned and a public inquiry is carried out before any decision is made.

Best wishes

[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: No to Berwick Bank - please relocate it away from sea birds
Date: 28 May 2026 20:29:56

To whom it may concern,

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe the location to be too close to sea birds around bass rock and beyond.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Best,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: NO to PHASING VARIATION OFPROPOSED WINDFARM AT BERWICK BANK
Date: 28 May 2026 13:49:52

Dear Sir/Madam

I have already lodged an objection to the proposed Berwick Bank windfarm. I am not opposed to windfarms as such. Years ago I invested in a windfarm [Redacted]
However I believe that a windfarm on Berwick Bank will be disastrous for seabirds.

I do not see how the proposed phasing variation will make this bad scheme any better.

I suspect that the developer has suggested phasing in the hope that objectors will lose interest in Berwick Bank and turn their attention to other matters.

Perhaps the developer thinks that if the awful scheme is phased, the public will forget about Berwick Bank.

I wish to have the variation application firmly refused. There is no need for a long and costly public inquiry. The arguments against siting a windfarm at Berwick Banks are already perfectly clear

There is plenty of water around Scotland. Just build the windfarm somewhere less dangerous for seabirds.

Yours faithfully

[Redacted]

From: [Redacted]
To: [Redacted]

Subject: Objection to Berwick Bank Phased Discharge of Conditions Application
Date: 27 May 2026 10:36:26

Dear MD-LOT

Further to the recently published variation application relating to phased discharge of conditions for the Berwick Bank Wind Farm project, I wish to submit the following formal objection from my own perspective as a fisherman establishing an independent fishing operation within the affected fishery.

While I do not object to offshore wind development in principle, I object to the proposed phased implementation and phased discharge of conditions on the basis that they are likely to create prolonged operational uncertainty, cumulative fisheries displacement and continuing disruption to the ability of fishing businesses to establish, maintain and operate viable long-term fishing operations within the Berwick Bank area and surrounding fishery.

I have extensive practical fishing experience within the Berwick Bank area through long-term fishing activity carried out on our family vessel over a significant period of time. More recently, I have acquired my own vessel with the intention of continuing to fish within the same grounds and

wider fishing areas which I have historically worked and relied upon operationally over many years.

Accordingly, I am concerned that phased offshore development and phased Fisheries Management and Mitigation Strategy (FMMS) processes may not properly reflect the practical realities faced by fishing businesses operating within an already heavily displaced and increasingly constrained fishery.

OPERATIONAL EFFECTS OF PHASED DEVELOPMENT

Phased development should not automatically be assumed to reduce operational impacts or improve outcomes for affected fisheries simply because construction activity is divided into sequential phases over time.

While the variation application presents phased implementation as offering operational flexibility and mitigation benefits, practical fishing experience indicates that phased construction may instead prolong uncertainty, extend cumulative displacement pressures, create repeated cycles of operational disruption and increase the duration over which fishing businesses remain subject to changing access arrangements, unresolved mitigation processes and continuing uncertainty regarding long-term viability.

Accordingly, the phased structure of offshore development may in some circumstances increase operational instability and long-term disruption for affected fisheries rather than reduce it in practice, particularly where robust independent mitigation and dispute resolution mechanisms are not clearly established from the outset.

Phased development structures may also transfer disproportionate operational uncertainty and cumulative disruption risk onto affected fishing businesses over extended periods of time while providing comparatively greater flexibility and operational control to the project developer.

In practice, phased development creates ongoing uncertainty regarding:

- where fishing activity can safely and productively operate;
- whether displaced fishing effort can realistically relocate between phases without wider operational impacts;
- how long disruption and displacement may continue; and
- whether fishing businesses operating within the wider fishery will be properly recognised and protected within mitigation processes.

WIDER FISHERIES DISPLACEMENT AND PRODUCTIVITY

Phased construction assumptions may rely too heavily upon the idea that fishing activity can simply relocate into adjacent phases or surrounding areas without significant operational consequences.

However, practical fishing experience indicates that displacement pressure, cumulative spatial squeeze, construction disturbance and redistribution of fishing effort can materially affect fishing conditions, operational productivity and viability across the wider fishery rather than solely within the immediate footprint of active construction works.

A fisher displaced from one phase of the development may therefore still experience continuing impacts within adjacent phases or surrounding fishing grounds due to wider construction-related disturbance across the overall windfarm area.

In practice, fish and shellfish behaviour, fishing conditions and operational productivity may be affected by monopiling, drilling activity, vibration, increased vessel activity and wider construction disturbance extending beyond the immediate footprint of individual construction

phases.

Concerns regarding the wider effects of construction activity upon fish and shellfish have also previously been identified within consultation responses relating to other Berwick Bank variation applications.

Accordingly, it is unrealistic to assume that operational impacts will occur solely within the immediate boundaries of the phase actively being worked at a particular point in time.

In practice, phased construction activity may continue to affect the wider windfarm area and surrounding fishery rather than only the individual phase subject to active works.

Similarly, fisheries mitigation processes associated with phased development may place excessive emphasis upon fishing gear physically located within defined construction or exclusion areas at particular points in time without adequately recognising wider operational impacts experienced across the surrounding fishery.

In practice, cumulative displacement, redistribution of fishing effort, increased fishing pressure and changing fishing conditions may affect fishing operations well beyond the

immediate footprint of active construction phases.

For fishing businesses attempting to establish and maintain stable operations within the fishery, the practical effects of phased displacement are therefore not confined solely to gear located directly within the development site itself.

Operational impacts may extend across wider fishing grounds through reduced productivity, increased competition for remaining grounds, changing fishing patterns and prolonged uncertainty regarding where viable long-term fishing activity can realistically continue.

Accordingly, fisheries mitigation frameworks should not rely solely upon narrow assessments of gear physically located within individual construction phases at isolated points in time, but should instead recognise the broader operational realities of cumulative displacement and wider fishery disruption over the operational lifetime of the project.

INVESTMENT, BUSINESS CONTINUITY AND OPERATIONAL VIABILITY

Phased fisheries mitigation frameworks may place excessive reliance upon static snapshots of deployed fishing gear or historic activity at

isolated points in time without adequately recognising the practical realities of ongoing investment, operational planning and business development within the fishing industry.

In practice, fishing businesses may commit substantial financial investment toward vessels, replacement gear, additional gear orders, vessel improvements and operational expansion well in advance of deployment within affected fishing grounds.

However, where phased construction activity, displacement processes or restrictive stakeholder recognition approaches arise before such investment can reasonably be deployed and established operationally, legitimate investment, operational intent and future fishing activity may not be properly recognised within mitigation processes.

This may be particularly significant for new entrants, next-generation fishermen, recently established operators and fishing businesses actively attempting to maintain, expand, modernise or transition operations over the operational lifetime of the project.

Accordingly, fisheries mitigation frameworks should not rely solely upon narrow static assessments of gear physically deployed within development areas at isolated points in time, but

should also be capable of recognising genuine operational intent, investment and ongoing operational development activity across the wider fishery.

Prolonged phased construction and cumulative displacement may in practice prevent fishing businesses from establishing, maintaining, modernising or developing stable and viable long-term fishing operations within the affected fishery.

While phased development may appear temporary on paper, repeated displacement, changing access arrangements, redistribution of fishing effort and ongoing construction activity across multiple phases may create continuing operational instability over extended periods of time.

In practice, this may result in fishing businesses, including new entrants and next-generation fishermen, being progressively displaced or effectively phased out of productive fishing grounds before they have had a realistic opportunity to establish, recover or maintain stable long-term operations within the fishery.

Assumptions regarding continued access between phases may also fail to reflect the practical realities of fishing conditions following prolonged construction activity and cumulative displacement.

The existence of nominal access alone does not necessarily mean that fishing conditions, productivity or operational viability have recovered in practice.

Where fishing activity becomes significantly less productive due to cumulative displacement, increased fishing pressure, disturbance or operational disruption across the wider fishery, fishing businesses attempting to establish and maintain operations may be disproportionately affected.

Accordingly, there can be no clear guarantee at the present time that fishing productivity or operational conditions within affected grounds will fully recover following prolonged phased construction activity.

Phased displacement assumptions may also fail to reflect the practical reality that fishing businesses cannot simply suspend operations indefinitely while prolonged phased construction, evidential processes or mitigation negotiations continue.

In practice, fishing businesses remain subject to continuing operational costs, vessel maintenance, gear replacement, insurance, harbour costs and wider financial commitments regardless of

whether productive fishing activity can continue normally within the affected fishery.

Accordingly, prolonged phased uncertainty and rolling operational disruption may create significant financial and operational instability even where nominal future access may theoretically remain available.

FMMS GOVERNANCE, EVIDENTIAL BURDENS AND INDEPENDENT DETERMINATION

Prolonged phased displacement and engagement-led mitigation processes may leave fishing businesses subject to continuing uncertainty, repeated evidential requirements and evolving operational positions over extended periods of time without any clear or independently enforceable route toward practical resolution.

In practice, fisheries mitigation frameworks which rely primarily upon ongoing engagement, voluntary negotiation or developer-led assessment processes may become increasingly difficult where agreement is not reached during active construction periods.

This may create circumstances in which fishing businesses remain subject to prolonged evidential

and operational uncertainty while construction activity and cumulative displacement continue.

Evidential requirements, qualifying criteria or mitigation positions may also change over time following reliance by fishing businesses upon earlier operational assumptions, stakeholder recognition or mitigation discussions.

In practice, fishing businesses require confidence that mitigation arrangements, stakeholder recognition processes and operational expectations will operate consistently, proportionately and fairly once significant operational and financial decisions have been made in reliance upon them.

There is also concern that Fisheries Management and Mitigation Strategy processes themselves should not become fragmented or effectively phased in a manner which weakens continuity, consistency or long-term operational protection for affected fishing businesses.

In practice, fisheries impacts arising from prolonged offshore construction activity, cumulative displacement and wider operational disruption do not necessarily occur in isolation within a single construction phase at a particular point in time.

Accordingly, fisheries mitigation frameworks should operate across the wider project area and over the full operational lifetime of the development rather than becoming narrowly compartmentalised according to individual construction phases.

A fishing business displaced or operationally affected during one phase of development may continue to experience wider operational impacts throughout adjacent phases and surrounding fishing grounds due to continuing construction disturbance, redistribution of fishing effort and cumulative displacement pressures across the overall windfarm area.

Accordingly, FMMS protections, stakeholder recognition and mitigation mechanisms should not be reduced, reset or narrowly limited solely by reference to individual construction phases where wider operational impacts continue to affect the surrounding fishery in practice.

Accordingly, phased mitigation frameworks should not rely solely upon prolonged engagement processes without access to sufficiently independent, timely and binding dispute resolution or determination mechanisms capable of bringing matters toward practical closure where prolonged disagreement or evidential deadlock arises.

This is particularly important where fishing businesses may otherwise remain exposed to continuing operational uncertainty, rolling phased displacement and repeated negotiation processes over extended periods of time without durable resolution.

Once phased development approvals are granted, there may also be limited practical mechanisms capable of independently reviewing whether mitigation frameworks are functioning effectively in practice where unresolved impacts, cumulative displacement or operational disputes continue over prolonged periods.

Accordingly, fisheries mitigation frameworks associated with phased offshore development should include sufficiently robust independent oversight, adaptive review and binding determination mechanisms capable of ensuring that mitigation continues to function fairly and effectively throughout the operational lifetime of the project.

LONG-TERM INDUSTRY SUSTAINABILITY

Prolonged phased uncertainty, cumulative displacement and the absence of sufficiently robust mitigation and dispute resolution mechanisms may progressively undermine

confidence, long-term investment and future participation within the fishing industry itself.

In practice, where fishing businesses and future operators cannot reasonably predict whether long-term operations, investment or fishing activity will remain viable over the operational lifetime of major phased offshore developments, this may have wider implications for succession, continuity and the long-term sustainability of fishing communities operating within affected areas.

Accordingly, phased fisheries mitigation frameworks should not merely exist procedurally on paper, but must also be demonstrably capable of functioning effectively, fairly and independently in practice throughout the operational lifetime of phased offshore development.

It is therefore important that fisheries mitigation frameworks properly recognise the practical realities of investment, succession and long-term operational establishment within the fishing industry rather than relying solely upon historic static assessments of existing activity at a single point in time.

Kind regards,

[Redacted]

From: [Redacted]

Subject: Objection to Berwick Bank phasing variation
Date: 26 May 2026 20:25:36

I object to the proposed phasing variation for the Berwick Bank wind farm for the following reasons.

- *The Environmental Impact Assessment is no longer valid*
- *The reports and data models are no longer valid*
- *The Seabird Compensation Plan needs to be looked at in its entirety - not in phases. The cumulative impact is important (to prevent displacement).*
- *The project was consented as an integrated whole - not in phases*
- *Conditions were imposed holistically - so needs to be readdressed*
- *Cumulative impacts may no longer be properly controlled.*
- *Seabird and marine ecology concerns*
- *Weakening of original safeguards*
- *Inadequate public consultation*

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages. That is known as salami slicing and is frowned upon for obvious reasons. It is deceitful.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Cc: [Redacted]
Subject: Objection to Proposal to Phase Berwick Bank Windfarm
Date: 30 May 2026 14:57:57

To whom it may concern:

I am writing to object to the proposed phasing variation for the Berwick Bank wind farm.
I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I have the following concerns:

- The Environmental Impact Assessment is no longer valid
- The reports and data models are no longer valid
- The Seabird Compensation Plan needs to be looked at in its entirety - not in phases. The cumulative impact is important (to prevent displacement)
- Insufficient public consultation has been carried out on this project and I full support any group that moves for a public inquiry

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Finally please note that - as part of a community group objecting to this proposal, I intend to ask for details on the objections under the Freedom of Information Act 2002 once the consultation has closed.

Thank you,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: RE: Berwick Bank Wind Farm
Date: 27 May 2026 14:23:32

Dear Sir/Madam,

I wish to formally **object** to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Best wishes

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Cc: [Redacted]
Subject: Re: Formal Objection Representation - Berwick Bank Phased Variation Application
Date: 27 May 2026 11:17:49

Original - amended to include contact details.

[Redacted]

[Redacted]

Dear MD-LOT Team

Further to the recently published variation application relating to phased discharge of conditions for the Berwick Bank Wind Farm project, we wish to make the following representation.

We are an active fishing and vertically integrated seafood processing business operating within the wider region affected by cumulative offshore wind development activity, and will be affected by the Berwick Bank project and associated fisheries displacement effects.

Our business has direct operational experience of fisheries displacement, cumulative spatial squeeze and engagement under existing Fisheries Management and Mitigation Strategy frameworks over an extended period of time. The observations set out below are therefore based on practical operational experience of how fisheries mitigation processes function within cumulative offshore development areas.

While we do not object to phased development in principle, we object to the variation application on the basis that practical operational experience indicates that phased implementation and phased discharge of conditions may create prolonged operational uncertainty, cumulative fisheries displacement and fisheries mitigation processes which are not currently supported by sufficiently robust, independently reviewable and practically operable mechanisms capable of functioning effectively throughout the phased construction and operational lifecycle of the project.

In particular, there appears to be insufficient clarity regarding how unresolved fisheries impacts are intended to progress where engagement and mediation fail to produce resolution during active construction phases, and insufficient independent oversight and escalation mechanisms to ensure that fisheries mitigation arrangements remain effective in practice over time.

General Observations on FMMS Operation

Given the reliance placed upon Fisheries Management and Mitigation Strategies

within the Environmental Impact Assessment and consent framework, the practical operation and effectiveness of such mitigation mechanisms is considered directly relevant to the adequacy of the wider assessment and mitigation process itself.

The consent conditions associated with the Berwick Bank project expressly require monitoring of the effectiveness of fisheries mitigation measures and provide for adaptation of the FMMS where mitigation effectiveness monitoring identifies the need for change. This is particularly important within phased offshore developments where mitigation frameworks, fisheries engagement processes and displacement effects may continue across multiple project phases and over extended periods of time.

Operational experience demonstrates that fisheries mitigation frameworks can become heavily dependent upon prolonged engagement, repeated evidential requests, mediation and ongoing process without any sufficiently clear mechanism capable of ensuring practical resolution where agreement between parties is not reached.

In practice, this can result in affected stakeholders being drawn into extended engagement processes for substantial periods of time, while impacts, uncertainty, and operational disruption continue.

There also appears to be increasing reliance within fisheries mitigation frameworks upon assumptions regarding future engagement, mitigation measures or operational processes which may not ultimately be secured, implemented or capable of functioning effectively in practice over the operational lifecycle of projects.

The existence of mitigation measures, engagement structures or procedural commitments within project documentation does not necessarily ensure that effective mitigation outcomes are achieved where unresolved impacts, cumulative displacement or prolonged operational disruption arise over extended periods of time.

Fisheries mitigation frameworks should therefore be assessed not only in principle or on paper, but in terms of whether they are capable of operating effectively and delivering practical outcomes in practice over time.

Engagement may support mitigation, but engagement in itself cannot be relied upon as effective mitigation unless it is capable of delivering practical outcomes and resolution in practice.

Dispute Resolution, Evidential Processes and Independent Oversight

Current FMMS structures appear heavily reliant upon voluntary engagement and non-binding mediation processes without sufficiently clear routes to binding resolution where disputes or unresolved impacts persist.

Where no accessible and proportionate route exists to independent determination,

adjudication, arbitration or other forms of binding resolution, unresolved matters may remain within prolonged engagement and evidential processes without any practical route to definitive resolution.

There also appears to be significant reliance upon developer-led engagement structures or discretionary agreement regarding whether matters progress beyond standard engagement and mediation processes.

In practice, where developers, developer-appointed representatives or standard Fisheries Liaison processes retain substantial influence over whether unresolved matters progress toward independent review or binding forms of resolution, affected stakeholders may have limited confidence that escalation mechanisms operate independently or proportionately in practice.

Routes to binding dispute resolution may also not be realistically accessible in practice for affected fishing stakeholders where the financial and professional costs associated with independent determination, adjudication, arbitration or litigation become disproportionate to the operational realities of small and medium-sized fishing businesses.

Operational experience further demonstrates that prolonged unresolved engagement can generate substantial professional and legal costs for affected fishing stakeholders simply seeking to engage with evolving displacement and mitigation issues across multiple offshore developments over time.

There also appears to be increasing potential for fisheries engagement and mitigation processes to become characterised by prolonged and repeated evidential requests without clearly defined proportionality, evidential thresholds or practical routes toward resolution.

In practice, affected fishing stakeholders may be required to repeatedly provide operational, spatial and commercial information over extended periods of time across multiple overlapping offshore development processes, creating the potential for prolonged evidential loops which increase uncertainty, operational burden and professional costs without necessarily progressing matters toward practical outcomes or resolution.

Evidential assessment and engagement processes may also become overly dependent upon unilateral or developer-led determinations regarding the adequacy, relevance or sufficiency of information provided by affected fishing stakeholders.

Where no sufficiently independent review or oversight mechanism exists in relation to evidential requirements and operational assessment, affected fisheries may have limited confidence that evidential processes operate proportionately, consistently or fairly over extended engagement periods.

Accordingly, fisheries mitigation frameworks should incorporate sufficiently transparent and independently reviewable evidential processes capable of ensuring procedural fairness and balanced consideration of operational fisheries evidence in practice.

Overlapping fisheries engagement structures operating across multiple offshore

developments may also reduce stakeholder confidence regarding the handling, circulation and use of operational fishing information across projects over extended periods of time.

Fisheries mitigation and engagement processes should therefore operate transparently, proportionately and with clear safeguards regarding evidential requirements, procedural fairness and the handling of stakeholder operational information.

It is also important that fisheries stakeholders retain access to independent escalation or review mechanisms outside standard Fisheries Liaison structures where concerns arise regarding proportionality, procedural fairness or operational assessment.

Delayed engagement, inconsistent engagement processes or disproportionate escalation pressures may further increase operational uncertainty and imbalance within fisheries mitigation processes over extended periods of time.

In practice, where affected fishing stakeholders remain dependent upon prolonged engagement structures without timely, proportionate and independently accessible routes toward review or resolution, this may place affected fisheries under continuing operational and financial pressure while unresolved impacts persist.

It is also important that fisheries stakeholders are able to rely upon agreed operational positions and mitigation arrangements without ongoing uncertainty arising from evolving or retractable engagement positions over extended phased construction periods.

Practical Experience from Live FMMS Operation

Practical experience from live Fisheries Management and Mitigation Strategy implementation demonstrates that engagement-led frameworks may become operationally ineffective where agreement between parties is not reached during active construction phases.

While current FMMS structures place significant emphasis upon liaison, communication, cooperation and mediation, experience in practice indicates that these mechanisms alone may not be sufficient to ensure impacts are meaningfully resolved or mitigated where disputes become prolonged or entrenched.

In particular, there appears to be limited clarity within current FMMS structures regarding:

- what operational mechanism applies once mediation and prolonged engagement fail to produce resolution;
- how unresolved impacts are intended to progress during ongoing construction activity;
- what safeguards exist to prevent prolonged evidential and engagement deadlock; and
- what adaptive review or escalation process applies where mitigation frameworks are not functioning effectively in practice.

Accordingly, it is considered important that future FMMS frameworks include:

- clearly defined escalation pathways beyond voluntary engagement and mediation;
- provision for independent adjudication, arbitration or binding determination where appropriate;
- anti-deadlock mechanisms and defined operational progression timelines;
- stronger adaptive review and Management of Change mechanisms where operational assumptions do not hold in practice; and
- independent oversight mechanisms capable of assessing whether mitigation is functioning effectively during active construction phases.

It is also important that ongoing engagement in itself is not automatically treated as evidence that mitigation is functioning effectively in practice where impacts remain unresolved during active construction activity.

Experience from operational implementation suggests that FMMS frameworks may operate effectively where parties remain aligned and cooperative, but become significantly more difficult where agreement fundamentally breaks down and no practical progression mechanism exists beyond continued voluntary engagement.

These considerations are particularly important within the context of large-scale phased offshore wind development and cumulative fisheries displacement, where unresolved impacts may persist over prolonged construction periods if robust operational escalation and adaptive review mechanisms are not incorporated from the outset.

Phased Development and Cumulative Displacement

The phased structure of the development also appears to rely upon an underlying assumption that displaced fishing activity can continue operating effectively through relocation into adjacent phases or surrounding areas as construction progresses.

However, practical operational experience indicates that fisheries displacement and construction impacts cannot necessarily be treated as geographically isolated or confined solely to the immediate footprint of an active construction phase.

In practice, offshore construction activity, piling, drilling, increased vessel movements, underwater noise, vibration and associated disturbance may affect fishing activity, fish and shellfish behaviour, operational productivity and wider fishing patterns across surrounding areas over extended periods of time.

Accordingly, the practical realities of cumulative displacement are considerably more complex than simply relocating fishing gear between adjacent phases while assuming equivalent operational conditions and fishing productivity continue uninterrupted.

This is particularly relevant where multiple offshore developments and cumulative

spatial squeeze already place substantial operational pressure upon the wider fishery.

Consultation responses submitted in relation to recent Berwick Bank variation applications also appear to demonstrate broader concern regarding uncertainty, cumulative effects, monitoring requirements and the practical effectiveness of mitigation measures over time. These themes further reinforce the importance of ensuring that fisheries mitigation frameworks remain capable of practical review, adaptation and independent oversight where operational experience indicates that assumptions made during assessment or consenting processes do not fully reflect practical impacts arising during live construction and operational phases.

Particular concern also arises where phased development and phased discharge of conditions create repeated cycles of uncertainty, displacement, changing access arrangements and operational disruption over extended periods of time.

In practice, fishing operations and associated processing activity require continuity, planning certainty and stable access to productive fishing grounds. Repeated “in/out” patterns of access and displacement determined through phased development processes may not represent a realistic or sustainable operational model for affected fisheries, particularly within areas already experiencing significant cumulative spatial squeeze arising from multiple offshore developments.

Practical displacement effects are not confined solely to the footprint of an individual development site. Where fishing effort is displaced from one area, pressure is redistributed across surrounding fishing grounds, increasing spatial competition, operational pressure and cumulative interaction across the wider fishery.

Impacts may therefore extend well beyond narrowly defined site boundaries, affecting fishing gear, fishing patterns and operational sustainability throughout the surrounding area.

Current fisheries engagement and mitigation processes also appear capable of becoming overly focused upon gear or activity physically located within the immediate development footprint, without adequately recognising the wider cumulative displacement effects experienced across the surrounding fishery.

Cumulative offshore development and spatial squeeze are increasingly altering fishing behaviour, fishing patterns and operational realities across the wider fishery over time.

In such circumstances, reliance solely upon historic fishing patterns, historic use of grounds or static baseline assumptions may fail to reflect the current operational realities of fishing activity and displacement in practice.

Displacement effects are likewise not confined solely to fishing gear physically located within the immediate development footprint at any one point in time.

In practice, displacement pressure, redistribution of fishing effort and cumulative spatial squeeze may affect fishing operations, surrounding gear deployment and wider operational sustainability across the broader fishery, including fishing

activity occurring outside narrowly defined development boundaries.

Stakeholder Identification and Fishing Continuity

It is also important that stakeholder identification and fisheries engagement processes are capable of recognising evolving fishing patterns, operational continuity and genuine succession within established fishing businesses operating across cumulative offshore development areas.

In practice, fishing businesses evolve over time through succession, operational restructuring and transition between vessels, skippers and family operators. Stakeholder recognition processes should therefore be capable of reflecting genuine operational continuity, practical fishing experience and established reliance upon affected fishing grounds, rather than relying solely upon narrow static ownership or historic vessel registration criteria.

Vertically Integrated Businesses and Wider Operational Impacts

The scope of environmental assessment and fisheries mitigation frameworks also does not always appear to fully reflect the realities of vertically integrated fishing businesses, where impacts extend beyond direct fishing activity itself and continue through associated processing operations, continuity of supply, workforce stability and wider operational sustainability.

The Berwick Bank consent conditions expressly reference assessment of impacts upon commercial fisheries in socio-economic terms, which is considered important in ensuring that wider operational impacts experienced by integrated fishing businesses are capable of being recognised within fisheries mitigation processes.

Approaches to assessing fisheries displacement and operational impacts may also become overly narrow in practice where assessment methodologies focus too heavily upon limited spatial footprints, static baseline assumptions or narrowly defined direct impacts without adequately recognising wider cumulative operational effects across the surrounding fishery.

In practice, cumulative displacement and spatial squeeze may increase operational pressures across the wider fishing operation, including impacts upon surrounding gear deployment, fishing patterns, steaming distances, fuel usage, operational efficiency and overall sustainability of fishing activity across cumulative offshore development areas.

Accordingly, fisheries mitigation and impact assessment processes should be capable of recognising the broader operational realities of cumulative displacement and the practical impacts experienced across the wider fishing operation, rather than focusing solely upon isolated gear interactions within narrowly defined development boundaries.

Long-Term Impacts, Recovery and Adaptive

Review

Restoration of access following construction activity also does not necessarily result in the recovery or normalisation of fishing activity in practice.

The restoration of physical access alone should not automatically be treated as evidence that fishing productivity, operational viability or fisheries conditions have recovered in practice.

Fishing behaviour, operational viability, productivity and continuity of operations may already have been materially altered by prolonged displacement, cumulative spatial squeeze and redistribution of fishing effort over extended periods of time.

Impacts upon fishing activity and associated processing operations may therefore continue well beyond the formal construction phase itself, including where fishing grounds remain less productive or operationally constrained following displacement and construction activity.

Given that the consent conditions expressly provide for monitoring of mitigation effectiveness and adaptation of the FMMS where required, practical operational experience and evolving cumulative impacts should remain capable of informing future mitigation review and adaptation processes over the operational lifecycle of the project.

The phased structure of the development further increases the importance of ensuring that fisheries mitigation frameworks remain capable of practical review, adaptation and effective operation over time where cumulative impacts, prolonged displacement or unresolved operational issues continue to arise in practice across successive project phases.

There also appears to be insufficient clarity regarding how mitigation frameworks are intended to respond where practical operational experience indicates that mitigation measures, engagement processes or fisheries management arrangements are not functioning effectively in practice over time.

Given the phased nature of the development and the potential for cumulative impacts, operational disruption and evolving circumstances across successive project phases, fisheries stakeholders require access to transparent and independently accessible review or escalation mechanisms capable of considering concerns relating to mitigation effectiveness, evidential proportionality, operational impacts and evolving fisheries circumstances over the operational lifecycle of the project.

Review, escalation and adaptation mechanisms should not be wholly dependent upon discretionary decisions by either developers or regulatory authorities once mitigation frameworks have been approved and implemented.

In practice, where unresolved operational issues, cumulative impacts or mitigation concerns continue to arise over extended periods of time, fisheries stakeholders require access to sufficiently independent, transparent and practically accessible mechanisms capable of reviewing whether fisheries mitigation arrangements are functioning effectively in practice and whether adaptation or escalation is required.

Accordingly, fisheries mitigation frameworks should incorporate clear and independently accessible oversight, review and escalation mechanisms capable of operating throughout the operational lifecycle of phased offshore developments.

It is further considered important that fisheries stakeholders are not left subject to prolonged operational uncertainty arising from repeated phased access changes, evolving engagement positions or ongoing phased displacement processes over extended periods of time.

In practice, fishing operations and associated processing activity require continuity, planning certainty and stable operational conditions. Fisheries mitigation arrangements should therefore be capable of providing clear and durable operational certainty for affected fisheries once displacement and mitigation arrangements are established, rather than prolonged rolling uncertainty dependent upon future phased processes or discretionary operational decisions over time.

Requested Considerations

Accordingly, it is requested that:

- fisheries mitigation frameworks are capable of functioning effectively in practice where disputes or unresolved impacts arise;
- cumulative displacement effects, wider spatial squeeze and restrictions upon fishing activity across the wider fishery are fully recognised within mitigation processes;
- stakeholder identification processes are capable of recognising evolving fishing patterns, cumulative displacement and practical operational realities over time;
- clear and proportionate triggers exist for escalation beyond mediation where engagement does not resolve impacts, including accessible routes to independent determination, adjudication, arbitration or other appropriate forms of dispute resolution;
- routes to binding resolution are realistically accessible in practice for affected fishing stakeholders;
- evidential requirements and information requests placed upon fishing stakeholders remain proportionate, transparent and capable of progressing matters toward practical outcomes and resolution;
- fisheries mitigation frameworks incorporate sufficiently transparent and independently reviewable evidential processes capable of ensuring procedural fairness and balanced consideration of operational fisheries evidence in practice;
- appropriate safeguards exist regarding the handling and circulation of stakeholder operational information within overlapping fisheries engagement structures;
- transparent and independently accessible mechanisms exist for review, escalation and adaptation where mitigation frameworks are not functioning effectively in practice over time;
- monitoring and review mechanisms are capable of assessing whether

fishing activity and productivity have genuinely recovered following displacement and construction activity;
- mitigation measures remain capable of operating where impacts continue beyond construction phases and through decommissioning and subsequent recovery periods; and
- mitigation frameworks are capable of providing practical certainty and stability for affected fisheries over the duration of the project, rather than prolonged rolling uncertainty dependent upon future phased engagement processes.

We would also request confirmation that we will be included as a formal fisheries stakeholder within the future Berwick Bank Fisheries Management and Mitigation Strategy consultation and engagement processes associated with the Berwick Bank project and phased variation application.

Given the reliance placed upon FMMS frameworks within the Environmental Impact Assessment and consent process, these matters are considered directly relevant to the practical effectiveness of fisheries mitigation over the lifecycle of the project.

Kind regards,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank
Date: 06 June 2026 11:51:15

The construction of Berwick Bank MUST BE STOPPED.

The killing of thousands of birds just should not be allowed.

What compensation can there be for the loss of so many birds.

Move the planned wind turbines far away from where the birds fly by.

It is inconceivable that anyone would think this is acceptable.

STOP THIS NOW.

From: [Redacted]
To: MD Marine Renewables
Subject: BERWICK BANK WIND FARM PROPOSAL
Date: 06 June 2026 11:49:32

Dear Marine Directorate,

I am writing to express my deep concerns about the proposed siting of a huge number of wind turbines at Berwick Bank, that is predicted to kill large numbers of our precious and beleagured seabirds.

I understand the system of 'compensation' but it is clear that no mitigating measures could compensate for the scale of deaths of adults birds and their young that this siting would cause. I beg you to halt plans and go back to the drawing board with a determination to find another site that will cause less destruction and needless death.

Thank you.

Yours sincerely,
[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank wind turbines
Date: 06 June 2026 10:32:09

I lived in Scotland when I was a young mum with my husband who was a doctor. Our quality family times were spent around these shores enjoying the wildlife and beaches. We have photos with Bass Rock in the background. It is a beautiful magical place full of wonder for children and adults alike to escape the realities and stresses of life.
We need these places to visit with our Grandchildren and to keep the legacy of this area for everyone to enjoy for many more generations.
I can't imagine why anyone would want to destroy this peaceful place and kill sea birds with wind turbines that are not appropriate for the area.
It's morally wrong we need nature, we already have sea birds and other marine life being destroyed by plastics in the ocean.
We can't endanger the needs of these birds to live and thrive as they have for many years. Place the turbines away from where they will do any damage. I can't believe anyone could even think of mitigating the loss of even one sea bird killed deliberately and it being alright!
I'm sorry to think that this is even being considered and I hope a sense of spirituality and Godliness will prevail in preserving this area in all its natural beauty that provides a sanctuary for so many visitors.
Kind Regards,
[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Windfarm
Date: 01 June 2026 09:26:21

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe generally the proposed location of the wind farm is wrong given the devastating impact it will have on bird life. As humans we have no right to drive species to extinction, particularly when other options to advance human energy creation are available

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Cc: Central Correspondence Unit; michael.shanks.mp@parliament.uk
Subject: Berwick Bank
Date: 06 June 2026 10:55:52

I wish to state my objection to the proposed Berwick Bank wind farm on the grounds of significant negative impact on the sea bird populations. Sea bird numbers are already under threat with large decreases in recent years. Siting the proposed wind farm close to established sea bird colonies will inevitably lead to the killing of large numbers of sea birds. This proposal is contrary to wildlife protection aims as espoused by the current government and if granted would be a dereliction of duty.

Yours faithfully

[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: BERWICK BANK
Date: 06 June 2026 10:43:01

Dear Sirs

I write to object most strongly against this proposed development , it is in the wrong place and will have devastating effects on birdlife, it MUST be reconsidered/relocated.

[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank
Date: 03 June 2026 12:09:32

Hi,

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Regards,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick bank
Date: 06 June 2026 12:18:14

I am appalled that Berwick bank wind farm is even being discussed. It is estimated to kill thousands of Protected! Sea birds. I am not opposed to wind farms, intact I think there should be wind and wave energy but to place a wind farm at Berwick bank is complete madness. SSE should reconsider the sighting of their wind farm where it will do considerably less harm.

[Redacted]

[Redacted]

From: [Redacted
To: [Redacted]

Subject: Berwick Banks.
Date: 06 June 2026 10:11:36

I understand that the developers of Berwick Banks are trying to change the terms of the planning permission given to this project in July 2025, specifically to split the project into 3 phases making it easier for them to achieve the required compensation for the loss of seabirds that will take place if these 307 turbines are built.
I realise that we need to create renewable energy but I object strongly to the location of Berwick Banks, so near to Bass Rock, an important base for many seabirds, who are already facing multiple threats to their existance and I object to SSE Renewables being allowed to manipulate the planning system.
Please will you only allow the wind farm to go ahead if it is sited in a better location, which does not threaten our already struggling seabirds population.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Banks
Date: 03 June 2026 08:29:36

Dear Marine Directorate

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, the cumulative impact on sea bird populations cannot be controlled or compensated for. The wider impact on marine ecology has not been addressed.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Regards

[Redacted]

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Mass Destruction of Seabirds
Date:	06 June 2026 10:49:39

Hello,

Berwick Bank is a huge 307-turbine wind farm planned off the East Lothian coast of Scotland, dangerously close to some of the most important seabird colonies in the world.

It is predicted to kill 2,808 Guillemots, 261 Gannets, 815 Kittiwakes, 66 Puffins and 154 Razorbills in its first year alone, according to the Scottish Government's case assessment. Over its 35-year lifespan, tens of thousands of protected seabirds would be killed.

For Pete's sake put it somewhere else.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Objection - Berwick Bank consent variation
Date: 02 June 2026 15:44:13

Good afternoon,

I am writing to object to the proposed variation of the consent for the Berwick Bank offshore wind farm.

I am seriously concerned that splitting the project into phases will reduce proper scrutiny of the full environmental and cumulative impacts of this development - particularly for internationally important, protected seabird populations.

The project should continue to be assessed as a whole, not in separate stages.

I request that this application to vary the consent is refused, or a full reassessment be carried out before any decision is made.

Thank you and best wishes,

[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: Objection to Berwick Bank Phasing Variation - 3rd June 2026
Date: 03 June 2026 10:03:47

I strongly object to the proposed phasing variation for the Berwick Bank wind farm.

This will reduce proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment. Additionally the original assessment, reports and data models are no longer valid, with the project consented as an integrated whole - not phased.

Assessment therefore, must continue as a whole, not in separate stages.

I would also suggest that consideration be given to an alternative to these massive windfarms I.e. tidal lagoon power plants - as in France. Much more environmentally friendly.

I therefore ask that the variation application is refused, and that a full reassessment and public inquiry is carried out before any decision is made.

Best regards

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Objection to the location of Berwick Bank wind farm
Date: 02 June 2026 13:43:10

Dear Marine directorate

I work as a volunteer at St Abbs Nature Reserve and object to the tactics of varying the phasing of the construction of the windfarm in order to get it approved.

The Berwick bank wind farm is extensive and its renewable nature is fantastic. However its location is the problem. It is located in an INTERNATIONALLY IMPORTANT SEABIRD HABITAT.

The birds cannot cope with such disruption to their breeding and feeding grounds. I'm a volunteer for The National Trust for Scotland and have helped the public see and appreciate these beautiful seabird places. Their importance cannot be ignored.

Both the RSPB and the Scottish Seabird Centre have raised concerns in their expert capacities. They are suggesting that up to 4000 birds could die in the first year alone. Thats equivalent to the human population of a small town.

Please visit the Stop Berwick Bank website for further information

https://www.stopberwickbank.co.uk/issue

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe this ecologically sensitive site is too important for the location of this wind farm. I am happy to have wind farms BUT NOT in this location.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made."

Yours sincerely,
[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Please stop Berwick Bank from destroying millions of seabirds
Date: 06 June 2026 10:00:32

Hello,

I am writing to urge you to oppose the proposed Berwick Bank offshore windfarm.

While I do not live in Scotland, I greatly value the natural environment and deeply care for Scotland's seabirds, which are of global importance. Most seabird species breeding in Scotland are already in decline, and this project threatens to exacerbate their plight.

Scotland is globally important for seabirds, with 5 million breeding on our shores, including 60% of the world's great skuas and around half of the world's northern gannets. Seabirds are key to the health and functioning of the marine environment, yet most seabird species in Scotland are in steep decline. Urgent action is needed to reverse this trend, ensuring the recovery of seabird populations and the resilience of marine ecosystems, as well as the coastal communities and economic sectors that depend on them. Berwick Bank offshore windfarm is to be located in a key foraging area for a huge range of species like puffins, gannets and kittiwakes. The developer's own impact assessment projects that the development could kill up to 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills a year. This would make it one of the deadliest windfarms in the world and would be a huge setback for Scotland's natural heritage. Its impacts are so severe, it could fast track species like Kittiwake to local extinction. Now, the developer wants to build this wind farm in phases, making it easier to find compensation for the seabirds that will be killed. That is not acceptable.

Scotland's seas offer vast renewable energy potential, and offshore wind is a key part of the Scottish Government's plan to reach net zero by 2045. However, it is essential that the location, scale, and technology of these developments avoid harming marine ecosystems, especially in the context of the nature crisis. Other projects such as Ossian demonstrate how floating turbine technology, sited further offshore and away from critical seabird habitats, can deliver similar energy benefits to proposals like Berwick Bank but with a lower environmental impact.

I am deeply concerned about the potentially devastating impact that Berwick Bank will have.

This is a key issue for me and many I am seeking your clear commitment to champion Scotland's seabirds, halt this devastating project and get behind nature positive offshore wind instead.

Yours sincerely,
[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Stop Berwick Bank
Date: 03 June 2026 14:50:17

Hello,

This is an email to say by going ahead with Berwick Bank, you are endangering the lives of hundreds of thousands of seabirds and wildlife.

It is completely the wrong location for a windfarm, what with the colonies of gannets, puffins, kittiwakes and more nearby, most of which are already endangered species.

They will get caught in the blades, their lifeless bodies washed up on shore as a reminder of the mistake that was made. It will be too late by then.

Is it really worth it? Sure, windfarms may be contributing to 'net zero' but is that really worth the cost? It seems as though the cons outweigh the pros.

Are we really going to put our Scottish wildlife at risk because of some human made idea? It shouldn't even be up for discussion. Animals will die, and their blood will be on the developer's hands. Where's humanity gone to?

That's the bottom line. End this now.

Sincerely,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Wind farm
Date: 06 June 2026 09:53:49

I agree with the Scottish Seabird Centre not to build wind turbines at Berwick Bank,
Why can't you build elsewhere, where it wouldn't cause so much damage to the wildlife?

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank -an objection.
Date: 07 June 2026 20:34:21

Dear Sir/Madam, these proposals cannot go ahead. The impact on our sea bird population is just too high. Many of these birds have never fully recovered from the avian flu out breaks, not to mention biodiversity loss, habitat destruction and climate change. Any compensation plans, can still never replace such a tragic loss of life. Please re consider and halt these destructive plans. Yours faithfully, [Redacted]
a supporter of RSPB.

Sent from Outlook for Android

From:	**[Redacted]**
To:	**[Redacted]**
Subject:	Berwick Bank development
Date:	06 June 2026 16:54:24

Sirs

I write to record my serious objection to the Berwick Bank project developers seeking to change the already agreed programme.

The UK is already one of the most "nature depleted" countries in the World, a situation that we should be seeking to rectify not to make worse. The Berwick Bank development already has been identified, by RSPB Scotland, as likely to become the deadliest wind farm in the world for seabirds in its currently proposed form. I append, below, their specific observations as a reminder

I have no doubt that the likely devastation of seabirds using nearby classic sites such as Bass Rock was taken into consideration by the authorities in granting planning permission in the first instance but that they sought to mitigate that risk by requiring the developers to provide compensation for the loss of seabirds caused by the development.

It is questionable whether any form of financial compensation would be capable of restoring the birds lost in light of their long-developed, habitual use of nearby nesting sites: accordingly, to allow the developers to change their plans so that, in effect, it will be easier to for them to minimise or even eliminate the penalty of required compensation would be a grave mistake.

Essentially, many nature lovers support offshore wind that works with nature, particularly where sited carefully in order to minimise potential seabird losses. Keeping such development away from the most important places is critical to avoid further loss of wildlife.

In recent years, we have all become more conscious of the mental health benefits found by the enjoyment of nature, whether it be companionable stroll in the park, bird and wildlife watching, walking in unspoilt natural green spaces, or enjoying companionship arising from a shared love of the outdoors. To agree to a plan that most likely will further threaten nature threatens the wellbeing of us all.

In the words of the RSPB "Berwick Bank is planned in the worst possible place, near iconic seabird sites like the Bass Rock. It should be stopped to make way for other, less damaging projects." To make it simpler for the developers to avoid responsibility, in whatever form, for likely further depletion of wildlife surely cannot be allowed and I sincerely hope that you will have that in mind when further considering the project.

Yours faithfully

[Redacted]

It is predicted to kill 2,808 Guillemots, 261 Gannets, 815 Kittiwakes, 66 Puffins and 154 Razorbills in its first year alone, according to the Scottish Government's case assessment. Over its 35-year lifespan, tens of thousands of protected seabirds would be killed.

The Scottish Government's scientific report into Berwick Bank said it estimates: "large and

wide scale impacts of [Berwick Bank] on seabird populations, the magnitude of which has not been recorded before in Scottish offshore wind assessment and is indicative of the large numbers of seabirds recorded at proposed site and their connectivity to designated sites."

RSPB Scotland is seriously concerned by the impacts this one development will have on already struggling populations of seabirds. We believe it could push species like Kittiwakes even closer to local and national extinction.

[Redacted]

Subject: Berwick Bank Objection
Date: 06 June 2026 18:24:31

Dear all,

As I am disabled, it is easier for me to email you all together rather than separately being unable to be on screen for long periods of time due to M.E. I lived in the Highlands of Scotland, I am now on the east coast of England in the Humber Estuary area and absolutely dismayed at the short sighted actions being taken on these wind farm developments with Berwick Bank the final straw.

First the considerations being made are irrelevant to the devastation this project is going to cause to marine life, migration routes and nesting sites for threatened seabirds, the resources from the earth to build these, and the ridiculous amount of energy and resources out of proportion to the amount of electricity they will supply.

In addition the vulnerability to our energy infrastructure being built in the North Sea when we are in the greatest danger from Russia we have ever been, will be an easy target to destroy and bring the nation to its knees on energy. On top of that, the destruction of all earth life, is the destruction of human life. At a time when mental health breakdown is returning humans to reconnect and remember we are nature, nature is part of us, and means that seabirds as part of our ecosystems and biodiversity are a critical element in that, this mass destruction is absolute madness and sickening.

Whilst no one is against renewables as the future, we are all against continued and blatant disregard and destruction of the natural world for commercial decision making with no vision of the consequences. The whole of the east coast downwards will be affected by this project, all the SSSI's and UNESCO status for the marshes as the birds will be killed before they get here. Once they are gone we cannot bring them back. A windfarm does not have longevity and does not contribute to the ecosystem of birdlife whatever bits of scrappy science you want to use to fight your corner.

I didn't want to write a boring statement of facts on this, I want you to search your hearts and souls, look at your families, the kids growing up who will never know these birds, the state of the nation and sterility

increasing as we destroy more and more of the natural world for short term commercial gain. This march on energy is not based on reality.

If we want renewables, we need to think with vision and guardianship of our nation and its land, ocean and airspace. We need to have solar panels on every roof before we wreck the oceans. We need to support the birds who make journeys that would cause humans to die in comparison, on their migratory routes. We learn from these creatures, birds are closer to humans in many ways than apes, the science is there to show you. Why are we killing and destroying everything for things that are transient? We need a stable future, we need nature to give us that stability, and we need to stop destructive projects and create ones that are sustainable and non destructive to the environment. Renewables are meant to support the environment and this project is a weapon of mass destruction to the natural world, namely the seabirds and our oceans.

The noise pollution under water is already causing harm to sonar and communication of whales, dolphins, porpoises and other marine life. What right do humans have to destroy the homes of ocean and air going creatures? We should be ashamed to call ourselves the intelligent species when we are so dumb! They have far superior intelligence, all we do is kill each other and life, torture each other and life, and destroy life sustaining gifts of the planet we live on, we don't have a good record!

Britain is being destroyed by these projects, birds and marine life are being destroyed, if our future is turbines in polluted oceans devoid of birds and wildlife, what a sick nation we will be and too late to restore it.

I don't care what your intellectual or commercial arguments are, this project is lethal and should be abandoned and re thought through. This is not the future, this is the death of our nation and its life sustaining waters, land and air. With human population decline as the climate crisis increases in severity, we need to look at energy supply in a different way. Even Trump has called us out on these, and I am not a fan of Trump! The death of birds to power a few thousand homes is not a business deal I would enter into, it is sealing the fate of ourselves into a downward spiral of death to the natural world and death to ourselves.

If you can look children in the eye and tell them you killed all the seabirds for a few megawatts of electricity and sleep at night, you have no heart and soul as well as denying the beauty and wonder for the health of our future generations.

Perhaps we should put you all in a balloon and send you through the turbines.....how will you navigate the blades?

Please abandon this project before its too late.
As a disabled person who can no longer walk on the beach, I can at least still see these birds fly over my garden and hear their calls and songs, and know they are safe in their nests. You will take that away from me and all others like me.....its despicable. I don't want electricity from Berwick Bank, I want seabirds, ocean life and a change in how we create electricity that sustains that. Berwick Bank does not, stop it before its too late. Thank you.

Yours sincerely
[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank offshore windfarm
Date: 07 June 2026 11:36:49

I am writing to you as I oppose the proposed Berwick Bank offshore windfarm.

Scotland is globally important for seabirds, with 5 million breeding on our shores, including 60% of the world's great skuas and around half of the world's northern gannets. Seabirds are key to the health and functioning of the marine environment, yet most seabird species in Scotland are in steep decline. Urgent action is needed to reverse this trend, ensuring the recovery of seabird populations and the resilience of marine ecosystems, as well as the coastal communities and economic sectors that depend on them.

Berwick Bank offshore windfarm is to be located in a key foraging area for a huge range of species like puffins, gannets and kittiwakes. The developer's own impact assessment projects that the development could kill up to 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills a year. This would make it one of the deadliest windfarms in the world and would be a huge setback for Scotland's natural heritage. Its impacts are so severe, it could fast track species like Kittiwake to local extinction. Now, the developer wants to build this wind farm in phases, making it easier to find compensation for the seabirds that will be killed. That is not acceptable.

A strong renewable energy sector in Scotland is vital for our climate and economy, and offshore wind will be an important part of this. However, it's essential that offshore wind is delivered in harmony with nature. We know this is possible, but it requires windfarms to avoid the most important sites for nature. Ossian windfarm, for example, is a similar scale to Berwick Bank but further offshore and located in a less sensitive area. This means its projected impact is significantly smaller.

I have visited North Berwick since I was a child (I am now 73) and make a journey around the Bass Rock every year to wonder at the largest northern gannet colony in the world, sadly heavily impacted by bird flu in recent years but appearing to make a fragile recovery so I am deeply concerned about of the potentially devastating impact that Berwick Bank will have and the need to halt this devastating project and to get behind nature positive offshore wind instead.

Sincerely

[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank Wind Farm
Date: 07 June 2026 20:17:07

Dear sirs,

I would like to take this opportunity to raise concerns and objections to the proposed wind farm.

To scale is seabird deaths cannot justify the building of such a farm. No amount of “compensation” can mitigate such destruction.

Biodiversity and nature is just as important out even more important that clean air. This scale of bird deaths cannot be called “green energy”.

Not is the time we should be protecting seabirds and not killing them.

I hope that this project can be reconsidered.

The very best regards,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank wind farm planned off the East Lothian coast of Scotland
Date: 06 June 2026 13:49:47

Hello,

As a regular visitor to North Berwick for family, golfing and wildlife holidays, I write to express my extreme concern regarding the planned wind-farm development off the East Lothian coast.

Whilst I accept the 'green drive' toward climate-friendly energy production I seriously question the chosen location of this development, having witnessed the wonderful seabird colonies in this area during boat trips around the Bass Rock, Craigleith and Fidra islands.

I understand that the Scottish Government's own scientific report into Berwick Bank said it estimates: "large and wide scale impacts of [Berwick Bank] on seabird populations, the magnitude of which has not been recorded before in Scottish offshore wind assessment and is indicative of the large numbers of seabirds recorded at proposed site and their connectivity to designated sites."

Bearing the above in mind, how can this development continue to be approved knowing that any compensation measures are just a token gesture to acknowledge the serious long-term environmental damage to local flora, fauna and tourism ?

Please, please reconsider your approval of the location of these 307 wind-turbines and hopefully provide a more promising future for the East Lothian coastal region that I so dearly love and cherish as a frequent tourist.

Yours faithfully

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Wind Farm
Date: 06 June 2026 13:03:44

Dear Sir/Madam,

Whilst I fully support green energy, I sincerely believe that this development is in the wrong place. The UK has the unfortunate reputation for having the least amount of nature left of any Country in the World and this development will be detrimental to sea going birds, many of which are either on the yellow or red list, meaning in decline, or in danger of extinction. I urge the Government of Scotland to look at a different place, or, a different method of green energy.

With very best wishes,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank wind farm
Date: 07 June 2026 08:40:35

Whilst I fully support renewable energy, I am also a keen birdwatcher. Any offshore wind farms must avoid damaging key bird colonies such as the Bass Rock. Changing an existing planning application to further reduce your responsibility to mitigate the impact of this installation is unacceptable.
Yours in hope
[Redacted]

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Wind Farm
Date: 06 June 2026 12:51:02

Dear Sir/Madam,

This huge 307-turbine wind farm planned off the East Lothian coast of Scotland, dangerously close to some of the most important seabird colonies in the world is seriously, seriously concerning. I forward information from RSPB and various other organisations and ask you PLEASE to cease such an action.

'It is predicted to kill 2,808 Guillemots, 261 Gannets, 815 Kittiwakes, 66 Puffins and 154 Razorbills in its first year alone, according to the Scottish Government's case assessment. Over its 35-year lifespan, tens of thousands of protected seabirds would be killed.

The Scottish Government's scientific report into Berwick Bank said it estimates: "large and wide scale impacts of [Berwick Bank] on seabird populations, the magnitude of which has not been recorded before in Scottish offshore wind assessment and is indicative of the large numbers of seabirds recorded at proposed site and their connectivity to designated sites."

RSPB Scotland is seriously concerned by the impacts this one development will have on already struggling populations of seabirds. We believe it could push species like Kittiwakes even closer to local and national extinction.'

The developer of Berwick Bank offshore wind farm has applied to change its plans for a development forecast to kill thousands of seabirds.

Berwick Bank developer SSE Renewables has applied to change the original planning consent granted by Scottish Ministers in July 2025. The project was greenlit on the condition that sufficient compensation would be found for all the seabirds which would be killed.

But Berwick Bank is planned in the worst possible place, near iconic seabird sites like the Bass Rock. It should be stopped to make way for other, less damaging projects."

That's why we (RSPB) - alongside the Scottish Seabird Centre, National Trust for Scotland, Marine Conservation Society and Scottish Wildlife Trust - have refused to contribute to any compensation measures for Berwick Bank. We believe this scale of loss cannot be compensated for.

-

PLEASE give serious attention to discontinuing with this plan of work.

-

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank wind farm
Date: 06 June 2026 15:32:34

I am deeply concerned about the revised plan for the Berwick Band wind farm, greatly increasing the number of turbines. I this goes ahead, the effect on the gannet colony on Bass Rock, and for many other seabirds, looks to be catastrophic. Please do not let it happen.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank wind farms
Date: 06 June 2026 13:55:57

Please do not grant planning to build wind farms near to the Bass Rock which is home to a world class sanctuary for seabirds, particularly the Bass Rock. There must be a more suitable and environmentally friendly location in the north sea which can be used for generating wind energy. No amount of compensation - whatever that may be - can offset the killing of thousands of seabirds.

"It is predicted to kill 2,808 Guillemots, 261 Gannets, 815 Kittiwakes, 66 Puffins and 154 Razorbills in its first year alone, according to the Scottish Government's case assessment. Over its 35-year lifespan, tens of thousands of protected seabirds would be killed. "

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Windfarm
Date: 07 June 2026 14:36:48

I am writing to object in the strongest possible terms to the proposals for Berwick Bank Windfarm. I have spent many hours on the Bass Rock and the thought of a severe threat to the seabirds fills me up horror. I appreciate that wind power is necessary but is it not possible to build in a less sensitive site?
Yours
[Redacted]

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Berwick Bank Windfarm
Date:	06 June 2026 19:42:29

Dear sirs,

I object to this proposed development on the grounds that the turbines would kill an unacceptable number of birds.

Yours sincerely,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank
Date: 06 June 2026 13:47:15

Sent from my Galaxy

[Redacted]

[Redacted]

[Redacted]

Dear Marine Renewables

I am writing to you to ask that you oppose the proposed Berwick Bank offshore windfarm. The mitigations proposed are insufficient as a recent report has shown.

Scotland is globally important for seabirds, with 5 million breeding on our shores, including 60% of the world's great skuas and around half of the world's northern gannets. Seabirds are key to the health and functioning of the marine environment, yet most seabird species in Scotland are in steep decline. Urgent action is needed to reverse this trend, ensuring the recovery of seabird populations and the resilience of marine ecosystems, as well as the coastal communities and economic sectors that depend on them.

Berwick Bank offshore windfarm is to be located in a key foraging area for a huge range of species like puffins, gannets and kittiwakes. The developer's own impact assessment projects that the development could kill up to 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills a year. This would make it one of the deadliest windfarms in the world and would be a huge setback for Scotland's natural heritage. Its impacts are so severe, it could fast track species like Kittiwake to local extinction. Now, the developer wants to build this wind farm in phases, making it easier to find compensation for the seabirds that will be killed. That is not acceptable.

A strong renewable energy sector in Scotland is vital for our climate and economy, and offshore wind will be an important part of this. However, it's essential that offshore wind is delivered in harmony with nature. We know this is possible, but it requires windfarms to avoid the most important sites for nature. Ossian windfarm, for example, is a similar scale to Berwick Bank but further offshore and located in a less sensitive area. This means its projected impact is deadly. I am deeply concerned about of the potentially devastating impact that Berwick Bank will have. This is a key issue for me and many in my

community. I am seeking your clear commitment to champion Scotland's seabirds and ask that you call on Gillian Martin MSP, Cabinet Secretary for Climate Action and Rural Affairs to halt this devastating project and get behind nature positive offshore wind instead. The mitigations proposed are already being watered down making it even more deadly.

This is an issue affecting our children and grandchildren. Of course renewable energy is required but Scotland already produces enough and this development is not in keeping with other Scottish government nature commitments.

Yours sincerely,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank
Date: 06 June 2026 14:10:26

Please think again about the siting of the wind farm which can potentially kill many seabirds due to where it will be.
I'm not against wind power at all but this needs more careful consideration.
Thank you for reading this email

[Redacted]

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Berwick Bank
Date:	06 June 2026 17:09:36

Good afternoon,

I am writing to state my absolute objection to the Berwick Bank wind farm.

Offshore renewables can play a big role in tackling the climate crisis and building a clean, green industry in Scotland. But it must be developed in harmony with nature. The proposed site for Berwick Bank windfarm is off the East Lothian and Fife coast, in an area which is vital for globally important colonies of seabirds. This development threatens to kill tens of thousands of seabirds during its lifetime. It's simply the wrong place for an offshore wind farm.

Already more than half of Scotland's seabird species are in decline, and in recent years some populations have been hit hard by avian flu. The projected impact of Berwick Bank threatens to further fuel declines.

Documents published by the Scottish Government alongside their consent for Berwick Bank highlight some of the most concerning projected mortalities.

It is predicted to kill 2,808 Guillemots, 261 Gannets, 815 Kittiwakes, 66 Puffins and 154 Razorbills in its first year alone, according to the Scottish Government's case assessment. Over its 35-year lifespan, tens of thousands of protected seabirds would be killed. In addition to this many will be displaced, forced to forage elsewhere.

On 1 August 2025 the Scottish Government consented Berwick Bank windfarm. However, that consent is conditional on the developer, SSE, producing a "Seabird Compensation Plan". It is impossible to compensate effectively for the sheer scale of impact that Berwick Bank is expected to have. The Scottish Government needs to recognise that compensation for Berwick Bank is neither plausible not appropriate, and to ensure that the project does not progress. Instead, the Scottish Government should focus its support on the many offshore windfarm proposals that are coming forward in less environmentally sensitive areas. These could generate clean, green electricity in harmony with nature.

Please do not allow this development to go ahead.

[Redacted]

From:	**[Redacte**
To:	MD Marine Renewables
Subject:	Berwick Bank
Date:	06 June 2026 17:43:35

STOP Berwick Bank wind farm!

The damage to Scotland's seabird population will be totally unacceptable.

[Redacted]

From: [Redact
To: [Redacted]
Subject: Berwick Bank
Date: 07 June 2026 07:52:27

Good morning

I would like to raise my objection to The Berwick Bank Wind Farm decision. As I understand it, Berwick Bank has been awarded a Contract for Difference by the UK Government, meaning it will receive millions of pounds of public money if it goes ahead.

Going ahead with this project would be a huge further blow for marine wildlife in Scotland and beyond. When 62% of seabird species are in decline across the UK, it is an absolute disgrace that public money will be used to support what is predicted to be one of the world's most damaging wind farms for birds. It is shocking and hugely disturbing to think that both the UK government and Scottish Parliament could think it acceptable to end the lives of even a few our our precious seabirds for this project. Bit to read that these lives can simply be 'compensated' is just abhorrent to me and has no place in modern society. These birds do not deserve to have their lives ended by this project whatsoever.

We can meet our climate targets without doing irreplaceable harm to wildlife. There are many other alternative developments which would together deliver more energy than Berwick Bank without such catastrophic impacts on seabirds.

I hope you will listen to what the people whose money will be used to reconsider Berwick Bank. Action for climate and nature must go hand in hand. We must support offshore wind which works with nature, not against it.

I trust you care about nature, this planet and the importance of these birds to Scotland and the wider environment in doing the right thing.

Kind regards
[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank
Date: 07 June 2026 08:30:21

Good morning,

I am am ardent supporter of renewable energy, but not at the expense of wildlife, when not properly considered.

Please listen to the experts and reconsider this project.

Best regards
[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank
Date: 07 June 2026 12:22:03

After reading the RSPB article on the drastic consequences on seabirds that will be caused by the Berwick Bank wind project I now have huge reservations as to whether the project should go ahead.
The effects will be catastrophic.

Regards

[Redacted]

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Berwick Bank
Date:	07 June 2026 19:39:00

Dear Sir

I'm writing to plead with you to reconsider the placement of the Berwick Bank Off Shore Wind Farm. I am totally in favour of green renewable energy, I think it is the way forward for the UK to make us less dependent on gas-based energy. However, when we know that the seabird populations are falling dramatically from the pressures of human fishing, avian flu, climate change and other factors, it seems crazy to actively kill even more by erecting this offshore wind farm.

I really believe that the way forward for us as the human race is to live with and respect our neighbours, our wildlife. I do hope that you will take the RSPB's advice on this development.

Yours sincerely

[Redacted]

From: [Redacte
To: MD Marine Renewables
Subject: Berwick Bank
Date: 06 June 2026 13:29:59

Hello
I am emailing to express my deep concern regarding the developments on Berwick Bank. The proposal is completely unacceptable due to it's impact on irreplaceable globally threatened bird life. Berwick Bank is planned in the worst possible place, near iconic seabird sites like the Bass Rock. If wind farms must be sited in that area then It should be stopped to make way for other, less damaging projects.

Yours truly
[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick bank
Date: 06 June 2026 22:06:31

Yet again birdlife is not to be considered as extinction is a real issue here !!! But no one cares in the industry of wind farms it seems
Berwick bank is a disaster in motion ♂♂♂
Shame on you all
[Redacted]

From: [Redacted]
To: [Redacted]
Subject: Berwick Banks
Date: 06 June 2026 13:37:32

I support offshore wind farms that work with nature, sited carefully away from the most important places for wildlife. But Berwick Banks is predicted to kill 2,808 Guillemots, 261 Gannets, 815 Kittiwakes, 66 Puffins and 154 Razorbills in its first year alone, according to the Scottish Government's case assessment. Over its 35-year lifespan, tens of thousands of protected seabirds would be killed.

The Scottish Government's scientific report into Berwick Bank said it estimates: "large and wide scale impacts of [Berwick Bank] on seabird populations, the magnitude of which has not been recorded before in Scottish offshore wind assessment and is indicative of the large numbers of seabirds recorded at proposed site and their connectivity to designated sites."

RSPB Scotland is seriously concerned by the impacts this one development will have on already struggling populations of seabirds.

I believe it could push species like Kittiwakes even closer to local and national extinction.

I believe this scale of loss cannot be compensated for and the project should be refused on those grounds and a more suitable site should be found.

[Redacted]

From: [Redacted]
To: [Redacted]
Subject: Berwick Read Windfarm Development
Date: 06 June 2026 19:28:20

Dear Sirs, Madams,
I respectfully and very strongly suggest that the original Planning for this Development is rescinded immediately in full.
WE, as the 'dominant species' on this Planet need, desperately, to be totally mindful of ALL Natural Species that we share this Planet with.
To the point that reading of the prediction of the destruction of so many Protected Birds as a result of this development the entire plan should be completely abandoned immediately.
I realise that the thought of a wind farm at sea is an excellent idea BUT NOT TO THE DETRIMENT of Nature.
The suggested compensation will simply not be realistic as there only has to be the slightest problem with this Plan for it to be proven to be useless. If it were to be 'that easy' then far more wildlife restoration projects would be put into play!
A powerful suggestion is for this entire Project to be re-sited in an area that in no way represents any form of danger whatsoever to Nature and all it's elements.
This is SO IMPORTANT as 'WE' as a species have given Nature, without which we will not survive, grossly insufficient thought at almost every turn conceivable.
PLEASE heed this and take all steps to ensure there is never any danger of this ilk to these precious seabirds and other wildlife.
Many thanks for your time taken to read this.

[Redacted]

From: [Redacte
To: MD Marine Renewables
Subject: Don"t kill seabirds!
Date: 06 June 2026 16:06:16

Move the windfarm development elsewhere! It's disgusting behaviour!

We want wind farms but NOT at the expense of the wildlife we are trying to protect.

What is wrong with you???

As usual, greed plays a part..there's no other reason.

Please find your conscience abd do the morally correct thing.

Thank you.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Objection to Berwick Bank Wind Farm
Date: 07 June 2026 17:38:41

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the development into phases evades legitimate scrutiny of the full environmental impacts, particularly for sea birds and the marine environment.

It would be more honest if the project was assessed as a whole - not in separate stages.

Like many people who care about wildlife, I have read the RSPB's warnings about the devastating impact of Berwick Bank on seabirds, some species of which - such as kittiwakes - are already in danger.

I am not anti-wind farm - far from it. But the proposed location of Berwick Bank - so close to such important breeding sites - is cruel and wrong.

Please acknowledge receipt of my objection.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Cc: [Redacted]
Subject: Objection to Berwick Bank Wind Farm
Date: 07 June 2026 11:17:56

Dear Sirs

I strongly object to the proposals to construct what is said the be the world's biggest wind farm off the coast of Fife.
I particularly object to the proposed phasing variation for the project. I believe this approach disingenuous and designed to force the project through the various scrutiny gateways with minimum opportunity to assess the true impact of such a huge project on the East Neil of Fife.
I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe that the project will have a materially advise effect on Fife in terms of lost tourist income; lost marine mammals, especially Orcas; and will devastate the sea bird colonies of the Forth, especially May Isle.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

From: [Redacted]
To: [Redacted]
Subject: Objection to change plans for Berwick Bank windfarm
Date: 07 June 2026 09:44:02

We are writing to you to oppose the proposed change to the planning consent for the Berwick Bank offshore windfarm.

This is a way for them to get round having to find a way to compensate (which is not possible) for the many thousands of birds that will be killed if this development goes ahead.

Scotland is globally important for seabirds, with 5 million breeding on our shores, including 60% of the world's great skuas and around half of the world's northern gannets. Seabirds are key to the health and functioning of the marine environment, yet most seabird species in Scotland are in steep decline. Urgent action is needed to reverse this trend, ensuring the recovery of seabird populations and the resilience of marine ecosystems, as well as the coastal communities and economic sectors that depend on them.

Berwick Bank offshore windfarm is to be located in a key foraging area for a huge range of species like puffins, gannets and kittiwakes. The developer's own impact assessment projects that the development could kill up to 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills a year. This would make it one of the deadliest windfarms in the world and would be a huge setback for Scotland's natural heritage. Its impacts are so severe, it could fast track species like Kittiwake to local extinction. Now, the developer wants to build this wind farm in phases, making it easier to find compensation for the seabirds that will be killed. That is not acceptable.

A strong renewable energy sector in Scotland is vital for our climate and economy, and offshore wind will be an important part of this. However, it's essential that offshore wind is delivered in harmony with nature. We know this is possible, but it requires windfarms to avoid the most important sites for nature. Ossian windfarm, for example, is a similar scale to Berwick Bank but further offshore and located in a less sensitive area. This means its projected impact is significantly smaller.

We are deeply concerned about of the potentially devastating impact that Berwick Bank will have.

[Redacted]

From: [Re
To: MD Marine Renewables
Subject: Please Cancel the Berwick Bank Project
Date: 06 June 2026 23:47:13

I am writing to you to object to the planned Berwick Bank wind farm, which is estimated will kill thousands of seabirds per year.

Berwick Bank offshore windfarm is to be located in a key foraging area for a huge range of species like puffins, gannets and kittiwakes. The developer's own impact assessment projects that the development could kill up to 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills a year. This would make it one of the deadliest windfarms in the world and would be a huge setback for Scotland's natural heritage. Its impacts are so severe, it could fast track species like Kittiwake to local extinction.

Scotland is globally important for seabirds, with 5 million breeding on our shores, including 60% of the world's great skuas and around half of the world's northern gannets. Seabirds are key to the health and functioning of the marine environment, yet most seabird species in Scotland are in steep decline. Urgent action is needed to protect these vital birds, and a project that is this much of a threat to them is a step in the completely wrong direction.

Renewable energy development in Scotland is a necessary part of our future, and offshore wind has the potential to be a crucial part of this- but only if is delivered responsibly. We know this is possible, but it requires wind farms to avoid the most important sites for nature.

Many others have recognised these issues. The Berwick Bank project is opposed by the RSPB, the National Trust for Scotland, and the Scottish Seabird Centre. Please listen to the science and cancel this dangerous project.

Sent from Yahoo Mail. Get the app

From: [Redacted]
To: MD Marine Renewables
Subject: Stop Berwick Bank Plans now
Date: 06 June 2026 22:58:48

Sirs/madams

I wish to object in the strongest possible terms to the plans for offshore wind development in sea bird sensitive areas around Bass Rock. This is an incredibly precious and important, rare breeding colony. The UK should be preserving this.

You cannot offset these deaths of breeding seabird colonies. The risk to breeding Kittiwakes particularly that would result in local extinction is wholly unacceptable! Bird flu has already knocked out the population.

I urge you not to accept the proposal alterations as they would be shamefully catastrophic.

There are surely other less critical places to position wind farms. If they are more expensive for the developer this surely reflects the cost of our wildlife as a unique resource.

Sincerely

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Application
Date: 09 June 2026 10:54:38

I am deeply concerned about the location and scale of this proposal.
The Scottish Government Scientific Report on the application indicates the estimated destruction to already endangered sea birds.

Compensation is not an option in this case - seabirds are not trees and cannot be replaced.

A smaller scale project in a different location is the only acceptable option in this case.

I urge you to bear in mind mine and other people's similar views.
Yours sincerely
[Redacted]

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Offshore Wind Farm
Date: 09 June 2026 13:57:58

To Marine Directorate,

My name is [Redacted] , I am writing today to express my strong objection to the proposed Berwick Bank Wind Farm development, proposed by SSE Renewables.

I have been a long time supporter of all forms of renewable energy and I continue to be so however, I can not support this particular development, as it is currently proposed, due to the incalculable damage it will cause to the wild bird life in this area.

I understand that as part of this application, SSE Renewables will be required to provide "Compensation" measures for any demonstrable damage it's development may cause to the wildlife of this area however, given the unprecedented numbers of wild birds, many of which are already in severe decline from existing human created causes, that will be killed every year of this wind farms operation, I do not believe any amount of "Compensation" or, mitigation measures will outweigh the disastrous impacts this development will have.

Given the location of this proposed development and its proximity to world recognised wild bird nesting sites, as well as the access flight paths of annually migrating birds, I find it incredible that SSE Renewables would believe this to be a suitable location.

As I previously mentioned, I am a firm believer that all forms of renewable energy should be explored, developed and promoted where possible and appropriate, as we must move away from fossil fuel use as a matter of urgency but we must always also consider the wider effects of any renewable energy development and ensure that we don't cause greater wider environmental harm as a consequence of such developments.

I believe that this proposed development is in the wrong place and will indeed cause more harm than the potential it has to create good effects. I believe that SSE Renewables should be encouraged to continue to explore the principle of this renewable scheme but that it should look to site such a wind farm in a location that will not have such a devastating effect on the resident and migratory wildlife.

Thank you for reading my objections.

Yours Sincerely.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Offshore Windfarm
Date: 08 June 2026 17:02:40

Dear Sir/Madam

I am writing to object to the proposed Berwick Bank offshore windfarm.

While I do not live in Scotland, I greatly value the natural environment and deeply care for Scotland's seabirds, which are of global importance. Most seabird species breeding in Scotland are already in decline, and this project threatens to exacerbate their plight.

Scotland is globally important for seabirds, with 5 million breeding on our shores, including 60% of the world's great skuas and around half of the world's northern gannets. Seabirds are key to the health and functioning of the marine environment, yet most seabird species in Scotland are in steep decline. Urgent action is needed to reverse this trend, ensuring the recovery of seabird populations and the resilience of marine ecosystems, as well as the coastal communities and economic sectors that depend on them.

Berwick Bank offshore windfarm is to be located in a key foraging area for a huge range of species like puffins, gannets and kittiwakes. The developer's own impact assessment projects that the development could kill up to 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills a year. This would make it one of the deadliest windfarms in the world and would be a huge setback for Scotland's natural heritage. Its impacts are so severe, it could fast track species like Kittiwake to local extinction. Now, the developer wants to build this wind farm in phases, making it easier to find compensation for the seabirds that will be killed. That is not acceptable.

Scotland's seas offer vast renewable energy potential, and offshore wind is a key part of the Scottish Government's plan to reach net zero by 2045. However, it is essential that the location, scale, and technology of these developments avoid harming marine ecosystems, especially in the context of the nature crisis. Other projects such as Ossian demonstrate how floating turbine technology, sited further offshore and away from critical seabird habitats, can deliver similar energy benefits to proposals like Berwick Bank but with a lower environmental impact.

I am deeply concerned about the potentially devastating impact that Berwick Bank will have.

This is a key issue for me and many I am seeking your clear commitment to champion Scotland's seabirds, halt this devastating project and get behind nature positive offshore wind instead.

Yours sincerely

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Renewable Project
Date: 08 June 2026 08:53:16

Having recently read a piece about this project I object to the plans.
It is definitely in the wrong place and would impact on the global bird population. Sea birds are already in decline through numerous different human activities.
Please consider my objection.
[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank windfarm - seabird "compensation" scheme
Date: 10 June 2026 06:58:52

To whom it may concern

I urge you to reject the developer's recent application to phase down the very clear requirement for a comprehensive seabird compensation plan ***prior*** to the project receiving final permission.

Such an approval would be a further betrayal of those who care about Scotland's iconic seabirds and lead to further disillusionment with the way such decisions are made.

Even with the expected (as yet unseen) compensation scheme, the project should clearly be rejected for the damage it will do to Scotland's wildlife, and the government's international standing when it comes to nature protection. However, the developer trying to get out of its commitments by starting the development without the comprehensive scheme in place would only further demonstrate the scheme for what many fear it is - a sham to make the project sound marginally less objectionable than it is.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Cc: [Redacted]
Subject: Berwick Bank Windfarm project
Date: 10 June 2026 14:57:52

Dear Sir/Madam

While I am a supporter of green wind and solar energy projects, I strongly object to the siting of this windfarm as the Forth and Tay area is home to an abundance of wildlife. As you know the area includes the world's largest Northern Gannet colony at Bass Rock; Kittiwake colonies at Fowlsheugh to the north and St Abbs to the south; and Gannet, Kittiwake, Puffin, Guillemot, and Razorbill colonies on the Isle of May and other Forth Islands. The area projected for the project is a major foraging area for these colonies.

The Scottish government case assessment predicted operationally the project would kill 2,808 Guillemots, 261 Gannets, 815 Kittiwakes, 66 Puffins and 154 Razorbills in its first year alone and therefore over the anticipated 35-year lifespan, tens of thousands of protected seabirds would be killed. The approval of the project was passed on condition that the developer mitigated these deaths or if not had to compensate for the loss of these birds. A feat that I believe is impossible to achieve.

I now understand that the developer is asking to split the project into 3 stages with compensation applied to each stage and from a reply I had from Carol Mochan MSP one of first compensations would include measures to work with the fishing industry to increase the food sources for sea birds which if successful could lift species numbers before development begins, which is a start, however, I believe that by splitting the project in this way the developer also knows that they will not be able to compensate for the deaths when operational as piecemeal compensation will only increase the number of birds available to be killed.

I therefore object strongly to the application to split project into stages and that the developer should provide details of how they will fully compensate for loss of birds and indeed loss of other wildlife living and breeding in the surrounding sea both during development and **essentially after operational status is reached** before permission is granted to start the project.

[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank
Date: 09 June 2026 14:22:49

Dear Sir,

The appalling destruction of seabirds which this development would cause makes the project indefensible. I hope you will consider other possible sites which would not entail such potential carnage.

Yours,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank
Date: 09 June 2026 11:40:25

Dear Sir/Madam

Berwick Bank?
Berwick Bank is a huge 307-turbine wind farm planned off the East Lothian coast of Scotland, dangerously close to some of the most important seabird colonies in the world.

It is predicted to kill 2,808 Guillemots, 261 Gannets, 815 Kittiwakes, 66 Puffins and 154 Razorbills in its first year alone, according to the Scottish Government's case assessment. Over its 35-year lifespan, tens of thousands of protected seabirds would be killed.

The Scottish Government's scientific report into Berwick Bank said it estimates: "large and wide scale impacts of [Berwick Bank] on seabird populations, the magnitude of which has not been recorded before in Scottish offshore wind assessment and is indicative of the large numbers of seabirds recorded at proposed site and their connectivity to designated sites."

In addition to this SSE are proposing changing planning, to now under compensate for seabird loss.

I have no objection to renewable forms of energy but they need to be in the right place to protect wildlife populations that are struggling.

I challenge you to read this email several times and then convince me that the position of this wind farm is an acceptable addition to renewable energy in this country. Perhaps you could also try and convince me that the loss of precious wildlife is tradable against the corporate greed of power companies. I look forward to your reply.

Kind regards
[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick wind farm.
Date: 08 June 2026 23:22:22

At a time when our sea birds have been under threat from overfishing, sea bed damage from trawling, and bird flue.
I find it very disturbing that the Scottish government, having had from their own experts, reports saying that 3 to 4 thousand seabirds in the first year alone might die because of this development.
All this when we are needing to stop the very worrying decline in biodiversity.

Yours sincerely ,
[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Formal Objection: Berwick Bank Offshore Wind Farm and the new variation requests
Date: 08 June 2026 11:47:47

Dear Marine Directorate Licensing Operations Team,

I am writing as a resident of England to formally submit my views and register my objection to the Berwick Bank Offshore Wind Farm and the subsequent variation requests.

While I do not live in Scotland, I greatly value the natural environment, and care about the Scottish seabirds, which are of global importance, and it must not come at the expense of fragile marine eco systems. Most seabird species breeding in Scotland are already in decline, suffering from climate change and avian flu, this project threatens to make the situation worse.

Scotland is globally important for seabirds, with 5 million breeding there, including 60% of the world's great skuas, and around half of the world's northern gannets. Seabirds are key to a healthy marine environment, but most seabirds are in decline in Scotland, which needs action to halt this trend to ensure the population recovery, to ensure a thriving marine ecosystem, as well as coastal communities and economic sectors which depend on them.

Berwick Bank offshore wind farm is to be located in a key foraging area, for these sea birds, for example puffins, gannets and kittiwakes. The developers own impact assessment concludes that the project could kill up to 261 Gannets, 2808 Guillemots. 815 Kittiwakes, 66 Puffins, and 154 Razorbills a year. This would make it one of the deadliest windfarms in the world, and would have a devastating impact on the population of these sea birds, and fast track species like Kittiwake to local extinction. Now the developer wants to build this wind farm in phases, making it easier to find compensation for the sea birds which will be killed, this is totally unacceptable.

Scotland's seas offer vast potential for offshore wind, but it is essential that the location, scale and technology of these developments don't come at a cost and avoid harming marine eco systems, especially with the nature crisis. For example another project Ossian uses floating turbine technology, sited further offshore and away from critical seabird habitats, and can deliver similar outcomes to proposals like Berwick bank but with a lower environmental impact.

I am deeply concerned of the devastating impact that this development would have on the Scottish seabirds, and a commitment to help the seabirds which live in Scotland, halt the project for a more nature positive offshore wind project instead.

Please formally record this objection and keep me updated on the progress of the application

Yours faithfully

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Fw: Objections to Berwick Bank offshore windfarm
Date: 08 June 2026 16:20:54

Dear Sir/Madam

I am writing to you to raise my objections to the proposed Berwick Bank offshore windfarm.

Offshore renewables could play a big role in tackling the climate crisis and building a clean, green industry in Scotland. But it must be developed in harmony with nature. The proposed site for Berwick Bank windfarm is off the East Lothian and Fife coast, in an area which is vital for globally important colonies of seabirds. This development threatens to kill tens of thousands of seabirds during it's lifetime. It is completely the wrong place for an offshore wind farm. Already more than half of Scotland's seabird species are in decline, and in recent years some populations have been hit hard by avian flu. The projected impact of Berwick Bank threatens to further fuel declines. Over the lifetime of the project Berwick Bank is projected to kill tens of thousands of seabirds. In addition to this many will be displaced, forced to forage elsewhere.

The developer's own impact assessment projects that this development could kill 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills in the first year alone, and tens of thousands more over its lifetime. This is against a backdrop of 70% of our seabird species being in decline. Building Berwick Bank as planned would be a huge setback for Scotland's natural heritage. Its impacts are so severe, it could fast track species like Kittiwake to local extinction. Berwick Bank has the potential to be one of the deadliest windfarms for birds anywhere in the world. I understand that consent for the project is conditional on these impacts being compensated for, but do not consider this to be either realistic or acceptable, especially since we are still waiting for SSE to publish a "seabird compensation Plan". This is not the kind of global leadership any of us would wish Scotland to be known for, and as well as doing irreversible damage to wildlife, it will undermine the good reputation of both Scotland and SSE around the world.

As a nature lover & someone who is extremely concerned about biodiversity loss, this is a key issue for me. The Scottish Government must halt this devastating project and get behind nature positive offshore wind in less environmentally areas instead that could generate clean, green electricity in harmony with nature.

Kind Regards,
[Redacted]

From: [Redacted]
To: MD Marine Renewables
Date: 08 June 2026 10:33:28

Dear Surs

I write about the proposed changes to your wind farm development plan. I urge you to think about the impact upon sea birds. Innocent creatures who face suffering. I am a proponents of green energy, but this has to be tempered with compassion. I urge you not to change the plan and stick to minimal pain to wildlife. They are precious too.

Thank you

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: North Berwick Bank
Date: 09 June 2026 22:21:37

Good evening i am contacting you in regards to the proposed North Berwick Bank windfarm.
I strongly object to the proposed phasing variation for the Berwick Bank Wind Farm.
I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts,particularly for sea birds and the marine environment.
The project should continue to be assessed as a whole not in seperate stages.
Further more i believe thousands of seabirds will be killed,which is absolutely disgusting behaviour from human beings and i do not know how people sleep at night knowing the devastation this project will have also to the marine wildlife,all for human greed.
I request that the variation application is refused or that a full reassessment public enquiry is carried out before harsh,devastating decisions are made.
Regards
[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Objection to the Proposed Berwick Bank Phasing Variation
Date: 09 June 2026 11:44:11

Dear Sir/Madam,

I object to the proposed phasing variation for the Berwick Bank offshore wind farm.

As a resident of East Lothian, I feel very fortunate to live close to a coastline that supports such an incredible variety of wildlife. Seeing seabirds such as gannets, kittiwakes, puffins and guillemots is part of what makes this area special. These species are already facing many pressures, and I am concerned that a development with such significant predicted impacts could cause further declines.

I support renewable energy and believe Scotland should continue to invest in offshore wind. However, I do not believe that tackling climate change should come at the expense of some of our most important wildlife. Renewable energy projects should be located and designed in a way that works with nature rather than causing avoidable harm.

I am concerned that dividing the project into phases makes it harder to properly assess its true environmental impact. A development of this size should be considered as a whole, so that the full effects on seabirds and the marine environment can be clearly understood. I also worry that allowing this approach could set a precedent for future large developments to avoid the same level of scrutiny.

For these reasons, I request that the variation application is refused, or that a full reassessment and public inquiry is carried out before any decision is made.

Yours faithfully,

[Redacted]

Maritime and Coastguard Agency

From:	**[Redacted]**
To:	MD Marine Renewables
Cc:	**[Redacted]**
Subject:	RE: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date:	11 June 2026 11:25:43
Attachments:	image003.png image004.png image005.png image006.png image007.png image008.png image009.png image002.png

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Good morning.

Thank you for the opportunity to comment on the application from Berwick Bank Wind Farm Limited (BBWFL) regarding Section 36 Consent and Marine Licence variations for the Berwick Bank Wind Farm (BBWF). The Marine Safety and PNT Services team of the Maritime and Coastguard Agency has reviewed the information provided and would like to comment as follows:

It is our understanding that BBWFL are seeking variations to the consent to allow for a phased approach to construction. BBWFL intends to construct BBWF on a phased basis, comprising Phases A, B and C. In addition, corrections to the co-ordinates included in the offshore transmission infrastructure (part 1) and offshore transmission infrastructure (part 2) marine licences are being sought. The applicant has been in contact with the MCA and Northern Lighthouse Board (NLB) in relation to these proposals.

As the project describes: '*The Phasing Variation is proposed to allow for a change to the operation of the above-referenced S36 Consent and Marine Licences to allow for discharge of conditions for each proposed Phase of development of Berwick Bank Wind Farm, rather than in relation to the development as a whole, as is required by the existing consent and licence condition wording'.*

BBWFL go on to state regarding stakeholders: *'While it is acknowledged that the relevant conditions cannot be fully discharged until the information relating to all phases has been provided, amending the conditions to make provision for partial or phased discharge would provide certainty to all parties (including statutory and other consultees) that BBWFL remains compliant with the S36 Consent and Marine Licences prior to entering, or upon completion of each phase.'*

MCA are content with the approach suggested regarding the variations at this stage and have no objections to the variations being granted. We would advise BBWFL to continue stakeholder engagement where appropriate and consult MCA and NLB regarding any further modifications to lighting, marking or layouts.

Finally, just a quick reminder on the change of email address from over the new year. This would be a good opportunity to inform the applicant to update their documents. His Majesty's Coastguard (HMCG) has stopped using the email addresses oilandgas@hmcg.gov.uk and renewables@hmcg.gov.uk These have now been replaced by a single email

address: **offshoreenergy.notifications@mcga.gov.uk**.

We will now include conditions and mitigations in our marine licensing and exemption responses which include the new email address; offshoreenergy.notifications@mcga.gov.uk. Please note that Marine Emergency Action Cards (MEACs) should continue to be sent to: oelo@mcga.gov.uk. The navigationsafety@mcga.gov.uk e-mail address remains valid for notifications and general queries as before.

If you have any questions on this response then please do get in touch,

Kind regards,

[Redacted]

[Redacted]

[Redacted]

Maritime & Coastguard Agency

Maritime & Coastguard Agency
Bay 2/25, Spring Place
105 Commercial Road,
Southampton SO15 1EG

Safer Lives, Safer Ships, Cleaner Seas
www.gov.uk/mca

Transport Scotland

From:	**[Redacted]**
To:	MD Marine Renewables
Cc:	**[Redacted]**
Subject:	RE: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response 3 June 2026
Date:	03 June 2026 21:42:17
Attachments:	image001.png

FAO: Marine Directorate - Licensing Operations Team

Thank you for the opportunity for Transport Scotland to comment on the proposed variation to the Berwick Bank Wind Farm Section 36 Consent and Marine Licence as granted on 31 July 2025. Having reviewed the supporting documents, I understand the purpose of the proposed variation is to allow for a change to the operation of the Consent and License to allow for discharge of conditions for proposed phases of the development, rather than as a whole. The document also states that the proposed variation does not alter the parameters of the development.

I also note that Transport Scotland is specifically mentioned within Condition 30 of the Consent, which relates to the production of a Construction Traffic Management Plan. I can confirm that Transport Scotland is satisfied with the proposed wording change to this Condition and has no objection to the proposed variation as a whole.

Kind regards

[Redacted]

[Redacted]

transport.gov.scot

Transport Scotland 5th Floor 177 Bothwell Street Glasgow G2 7ER

TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

Northumberland Inshore Fisheries and Conservation Authority

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	Re: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date:	10 June 2026 10:28:13
Attachments:	Outlook-A picture .png

Dear Sir/ Madam

Thank you for giving us the opportunity to review the Marine License variation for Berwick Bank Windfarm and keeping us updated.

We have noted the requests and have no further comments.

Best wishes

[Redacted]

BT

From:	radionetworkprotection@bt.com
To:	MD Marine Renewables
Cc:	radionetworkprotection@bt.com
Subject:	RE: WID14335 - 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date:	02 June 2026 11:31:37
Attachments:	image001.png image003.png

General

OUR REF: WID14335

Thank you for your email.

We have restudied this proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

We concluded that the proposed should not cause interference to BT's current or planned radio network. Our original response stands to the offshore structures and there appears to be no new structures at height onshore we need to be aware of. If there are any we have missed please confirm and we will reassess the proposal.

BT requires 100m minimum clearance from any structure at height to the radio link path. It should be noted that this decision is for the date of its issue, includes no micro-siting, as the use of the spectrum is dynamic and can change on an ongoing basis. Therefore, please reconsult us if there are any changes during the planning process with heights and locations of any structures, and its finalisation, as we may have new links assigned by Ofcom over its duration.

Please note this refers to BT Radio Links only, you will need to contact other providers separately for information relating to other supplier links / equipment.

Please direct all queries to radionetworkprotection@bt.com

Kind Regards

[Redacted]

National Radio Planner
Radio & Satellite Platforms
Specialist Platforms, BT Networks

Representations (Batch 3)

RSPB

[Redacted]
Licensing Operations Team – Marine Directorate
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Sent by email only MD.MarineRenewables@gov.scot

2 July 2026

Dear [Redacted]

APPLICATION TO VARY CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 FOR BERWICK BANK OFFSHORE WIND FARM

Thank you for consulting RSPB Scotland on this application to vary the Berwick Bank Offshore Windfarm consent, granted on 31 July 2025, to allow for phasing of conditions and to correct discrepancies on co-ordinates for part of the infrastructure. We also appreciate you agreeing to an extension of time in which to submit our response.

Our primary objection to the now consent development proposal is contained within our letter of 31 March 2023. We subsequently maintained our objection, as set out in out letter dated 27 October 2023, following the submission of Additional Environmental Information by the Applicant. The reason for our objection to the proposal is because the impacts from the proposed development are widespread, significant and of an unprecedented scale. Potential for Adverse Effect on Site Integrity (AEoSI) cannot be excluded for kittiwake, gannet, razorbill, guillemot, and puffin at four Special Protected Areas (SPAs). In combination with other North Sea windfarms, potential for AEoSI cannot be excluded for twelve SPAs.

RSPB Scotland recognises that climate change is the greatest long-term threat to nature, and we support the transition to renewable energy. We support the principle of offshore wind and recognise the part it can play in tackling the climate crisis; however, this must be done in a way which minimises impacts on nature.

Since the Application to Vary the Consent does not contain any significant change to the overall project and therefore is not a significant reduction in harm to nature, RSPB Scotland reiterates our extant objection because of such devastating impacts upon birds

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The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

Patron: His Majesty The King **President:** Dr Amir Khan **Director, RSPB Scotland:** Anne McCall.
The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654. Registered address: The Lodge, Potton Road, Sandy, Bedfordshire, SG19 2DL

especially as this important feeding area would qualify as an SPA in itself for a number of seabird species that breed in SPA sites around the Scottish Coast (as recognised by NatureScot in its objection to Berwick Bank Offshore Wind Farm, submitted to the Scottish Government on 31 March 2023).

The Application does not constitute sustainable development and so is contrary to the National Marine Plan and the Sectoral Marine Plan, the foundation upon which decisions for development in the marine environment should be made, neither of which support this development. The requirements of the Habitats Regulations have also not been met since the decision to grant was made despite no effective compensation being included in the consented proposal. The predicted AEoSI are significant and unprecedented in scale, subsequently the compensation required should this development be constructed will be significant and unprecedented in scale. We have significant and well founded concerns as to whether the provision of sufficient levels of compensation is possible.As the decision documentation and points raised by NatureScot and the Scottish Government make clear sufficient compensation is required, but will be challenging to obtain, supporting and strengthening our view. We acknowledge Condition No 32 (Compensation for adverse effects on Special Protection Areas) within the Section 36 consent is intended to address this by requiring a full seabird compensation plan to be submitted prior to any development being commenced.

However, the normal principle test for conditions in relation to development are that development applications should be refused if there is a lack of evidence confirming compensation will be possible legally, financially and ecologically. Whilst we acknowledge the creation of strategic compensation – that too is not fully formed or functioning. In addition, the amount of compensation required for Berwick Bank would almost certainly use all of the few "worked up", most effective and more direct measures currently being proposed for strategic compensation potentially leaving no measures for less harmful applications.

The condition is clear that a full seabird compensation plan is required before any development can start with no reference to a phased approach, meaning the Applicant must submit, as a whole, not in a piecemeal manner. But the Application to Vary requests a change to this Condition. Without prejudice to the fact that we do not think the extant consent should have been granted, the condition attached was at least all encompassing, being clear on the stringency of the requirement for compensation for impacts from the whole project, due to the significance and widespread scale of the AEoSI. Consequently, we are very concerned in terms of the ecological implications (as discussed further below) but also do not see any possible justification for the Scottish Government to agree a phased approach for compensation. Many possible seabird compensation measures will take time to become effective, and some may need years to become so. Therefore, at the very least, no change should be allowed to the Condition ensuring development can only start when there is a comprehensive and effective full compensation plan with NatureScot and Scottish Ministers approval and having gone through a consultation process with key stakeholders such as RSPB Scotland. If, however, a change to the Condition is made, it would seem vital that there should be a further assessment done of the proposed sequencing of the compensation measures, with priority given to those that require time to be established (as covered in more detail below).

Within the ornithological addendum submitted with this application, the Applicant makes the case that the IROPI case has been strengthened by an updated policy framework, reinforced by recent geo-political instability altering global energy markets. We would

point out that the policy framework for nature (and specifically seabirds) has also been strengthened significantly with the Scottish Government's adoption of the Scottish Seabird Conservation Action Plan, Scotland's Biodiversity Strategy to 2045 and the recent commitment to statutory nature targets. In addition, several alternative offshore wind farms are advancing through the consenting process which would result in less need for this particularly damaging proposal to address climate change concerns.

Detailed comments on methodology

The Applicant is proposing to build out in three discrete phases from phase B to A to C, all within the original 8-year construction window. We have significant concerns relating to how mortality has been apportioned between phases. At present the method simply takes Phase B's share of total array area and applied a correction factor for observed bird density. This assumes birds are evenly distributed across the site, which the available distribution data does not support.

RSPB Scotland's view is that the Applicant should be required to re-run both their collision risk modelling and their SeabORD displacement modelling for each phase individually and for phase combinations using the bird distribution data applicable to each phase. The relative outputs would provide a much more logical and defensible basis for setting compensation levels under each phasing scenario based upon more accurate impacts.

Without a revised estimate of the mortality caused by each phase, it is difficult to determine with any confidence whether the proposed compensation for Phases B and A would represent appropriate measures relative to the actual mortality likely caused by those two phases of the development.

Finally, the underlying survey data is now quite old. Other wind farms have been built in the region since those surveys were conducted, which is likely to have displaced birds into the Berwick Bank area. Basing assessments on the original data could now underestimate the current usage of the site. We have significant concerns as to whether the original data remains sufficiently representative to underpin decisions about phasing and compensation for what will be a 35-year operational development.

Conclusion

RSPB Scotland **objects** to the proposal being of the view that the quantum of compensation required by this development is not practicably feasible at the scale required. We have significant concerns that an emphasis continues to be placed upon the sand eel closure measure for compensation when the intention of this was to improve the resilience of the wider marine ecosystem in the long term[1] and not as a retrospective compensation measure for an incredibly damaging project that did not even have consent when the sand eel closure was implemented. We are deeply concerned that in reality, if the condition is allowed to be phased, if and when the first phase can be compensated for and development commences, this will lead to investment decisions and a momentum that may make the remaining phases extremely difficult to prevent, even if there is no confidence that effective and adequate compensation can be provided. The prospect of any adequate and realistic prospects of compensation is further eroded by the fact that the data and calculations used to justify this change is old, with new wind farms being

[1] As the Governments within the relevant legislation and during the EU Arbitration this is to contribution to meeting the UK Marine Strategy and the Arbitration decision reflects this.

constructed in the Forth area likely to be displacing seabirds to the Berwick Bank array area, in turn undermining any conclusions that can be drawn from it.

Should you require any clarification or further information please do not hesitate to get in contact.

Yours sincerely

[Redacted]

[Redacted]
Senior Conservation Planner, RSPB Scotland

West Barns Community Council

MD.MarineRenewables@gov.Scot

Marine Directorate – Licensing Operations Team

Scottish Government

375 Victoria Road

ABERDEEN

AB11 9DB

ELECTRICITY ACT 1989 THE ELECTRICITY GENERATING STATIONS)APPLICATIONS FOR VARIATIONS OF CONSENT (SCOTLAND) REGULATIONS 2913 MARINE (SCOTLAND) ACT 2010 MARINE AND COASTAL ACCESS ACT 2009

00013351/00013352/00013352 – Berwick Bank Windfarm Ltd, Berwick Bank Windfarm S36 Consent and Marine Licence Variations- Phasing Variation- Consultation

West Barns Community Council (WBCC) acknowledge correspondence from the Marine Directorate on 7th May 2026 regarding the above.

WBCC note the request by the Developer to vary the conditions of the Marine Licence granted on 31st July 2025 to Berwick Bank Windfarm Ltd.

WBCC have discussed the request at their meetings and by e mail.

WBCC make the following Comments

a)Request to correct discrepancies in the co-ordinates included in the offshore transmission infrastructure (part 1)and offshore transmission infrastructure (Part 2) Marine Licenses.

WBCC do not object to this request.

b)Request to allow for the discharge of conditions for each proposed phase of the Development of Berwick Bank Wind Farm as opposed to the development of the whole project.

WBCC object to this request.

i)The original consent was for the whole project and not for sections of it. It is essential that the development continues to be determined as a whole and not in separate stages.

ii)WBCC are aware that the developers, SSE, were required to submit a “suitable” Seabird Compensation Plan (SCP) to compensate for any seabird deaths. WBCC are concerned that any division of the Project into phases will salami slice the impact on globally important seabird colonies. The SCP and the cumulative impact on seabirds in the area of the Project must be considered as a whole.

iii)Division into phases will render the current Environmental Impact Assessment for the Project invalid. Again, consideration of the overall environmental impact is essential.

iv)The current reports and data modelling will no longer be valid if the development is considered in phases as they were again provided for the entire project. They will need to be rewritten to allow for any changes.

v)Splitting the project into slices may reduce proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds but also for the wider marine environment including food sources like sand eels and for fish and nephrod stocks vital to the Dunbar fishing fleet.

Therefore, WBCC request that the variation request is refused or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

Planning Link West Barns Community Council

[Redacted]

[Redacted]

17/6/2026

Dunbar Community Council

The Community Council of the Royal Burgh of Dunbar

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Marine Directorate – Licensing Operations Team
Scottish Government
375 Victoria Road
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ELECTRICITY ACT 1989 THE ELECTRICITY GENERATING STATIONS)APPLICATIONS FOR VARIATIONS OF CONSENT (SCOTLAND) REGULATIONS 2913 MARINE (SCOTLAND) ACT 2010 MARINE AND COASTAL ACCESS ACT 2009

00013351/00013352/00013352 – Berwick Bank Windfarm ltd, Berwick Bank Windfarm S36 Consent and Marine Licence Variations- Phasing Variation- Consultation

Dunbar Community Council (DCC) are aware of the request to vary the conditions of the Marine Licence granted on 31st July 2025.

DCC make the following Comments

a)Request to correct discrepancies in the co-ordinates included in the offshore transmission infrastructure (part 1)and offshore transmission infrastructure (Part 2) Marine Licenses.
DCC do not object to this request.

b)Request to allow for the discharge of conditions for each proposed phase of the Development of Berwick Bank Wind Farm as opposed to the development of the whole project.

DCC object to this request.

i)The original consent was for the whole project and not for sections of it. It is essential that the development continues to be determined as a whole and not in separate stages.

ii)DCC are aware that the developers, SSE, were required to submit a "suitable" Seabird Compensation Plan (SCP) to compensate for any seabird deaths. DCC are concerned that any division of the Project into phases will salami slice the impact on globally important seabird colonies. The SCP and the cumulative impact on seabirds in the area of the Project must be considered as a whole.

iii)Division into phases will render the current Environmental Impact Assessment for the Project invalid. Again, consideration of the overall environmental impact is essential.

iv)The current reports and data modelling will no longer be valid if the development is considered in phases as they were again provided for the entire project. They will need to be rewritten to allow for any changes.

v)Splitting the project into slices may reduce proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds but also for the wider marine environment including food sources like sand eels and for fish and nephrod stocks vital to the Dunbar fishing fleet.

Therefore, DCC request that the variation request is refused or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

[Redacted]

Fife Council

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	26/01326/CON - Consultation Response Regarding Proposed Variation to Section 36 Consent and Marine Licences (00013351/ 00013352/00013352) for Berwick Bank Off-Shore Wind Farm
Date:	17 June 2026 16:46:27
Attachments:	image.png

Dear Marine Directorate

Thank you for the consultation regarding the above application.

Fife Council, as Planning Authority, has no comments to make.

Kind regards

[Redacted]
Lead Professional
Major Business and Customer Service
Planning, Climate and Sustainability Service
Fife House
North Street
Glenrothes
KY7 5LT

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All other enquiries should be directed to - development.central@fife.gov.uk. This will help us to respond to your enquiry as quickly and efficiently as possible.

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Fife Council
****

Dee District Salmon Fishery
Board

Dee District Salmon Fishery Board

Marine Directorate
Marine Licensing and Consenting
Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

By email to MD.MarineRenewables@gov.scot
16th June 2026

Dear MD Team,

Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation

On behalf of the Dee District Salmon Fishery Board (Dee DSFB) we welcome the opportunity to respond to the Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation Request.

Designations & Conservation Status - Atlantic Salmon

As a statutory body charged with the protection of Atlantic salmon and sea trout stocks within its district, (which includes the catchments of the River Dee, Cowie Water and Carron Water and adjacent coastline in Aberdeenshire) the Dee DSFB has a duty to ensure that there are no significant adverse impacts upon the populations of these species.

The Dee has been designated as a Special Area of Conservation under the EC Habitats Directive 92/43 EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna for Atlantic salmon (the principal species for which it receives this designation).

The International Union for Conservation of Nature's (IUCN) latest Red List of Threatened Species (December 2023) reclassified Atlantic salmon from 'Least Concern' to 'Endangered' in Great Britain because of a 30-50% decline in British populations since 2006 and 50-80% projected between 2010-2025. The Scottish Government has released a Scottish Wild Salmon Strategy which calls on government agencies, as well as the private sector, to prioritise the protection and recovery of Scotland's wild Atlantic salmon populations.

Salmon and many other key species of diadromous fish have also been identified as Priority Marine Features and UKBAP Priority Species.

Designations & Conservation Status - Other Species

The Dee District also supports populations of trout, eels and brook, river and sea lampreys.

Sea trout, common to all the rivers within the Dee District, are a priority species under the United Kingdom's Biodiversity Action Plan (UKBAP).

All lamprey species are protected under the EC Habitats Directive whilst river and sea lampreys are additionally protected under the UKBAP priority list.

Eels are a UKBAP priority species, critically endangered under the IUCN red list and protected under CITES.

Comments

Based on the location of this development and the content of the Marine Licence variation for the Berwick Bank Windfarm, the Dee DSFB have no comment on this consultation.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

[Redacted]

[Redacted]

River Operations Manager, Dee District Salmon Fishery Board

Forth Ports

From:	**[Redacte**
To:	MD Marine Renewables
Subject:	FW: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date:	17 June 2026 07:43:23
Attachments:	image001 png image003 png

Hi there

As per below, we have no comments.

[Redacted]

[Redacted] PA to the Chief Legal and Property Officer | Forth Ports Limited

Head Office | 1 Prince of Wales Dock | Edinburgh | EH6 7DX

T: 0131 555 8709 | **[Redacted]** | https://forthports.co.uk

Ministry of Defence

Defence Infrastructure Organisation

Wendy Talbot
Assistant Safeguarding Manager
Ministry of Defence
Safeguarding
Defence Infrastructure Organisation
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United Kingdom

Application Ref: 00013351 / 00013352 / 00013352

Our Reference: DIO10049075

E-mail: DIO-Safeguarding-Wind@mod.gov.uk

Scottish Government
Licensing Operations Team
Marine Directorate
Marine Laboratory
ABERDEEN
AB11 9DB

18 June 2026

Dear Sir / Madam

ELECTRICITY ACT 1989
The Electricity Generating Stations (Applications for Variation of Consent) (Scotland) Regulations 2013

MARINE AND COASTAL ACCESS ACT 2009

MARINE (SCOTLAND) ACT 2010

00013351 / 00013352 / 00013352 - Berwick Bank Wind Farm Limited - Berwick Bank Wind Farm – Section 36 Consent and Marine Licence Variations – Phasing Variation

Thank you for consulting the Ministry of Defence (MOD) on the above Section 36C and Marine Licence application to vary the consent granted to construct and operate the Berwick Bank Offshore Wind Farm received by this office on 7 May 2026.

I write to confirm the safeguarding position of the MOD regarding this variation of consent application.

The consented development consists of up to 307 Wind Turbine Generators (WTGs) with a maximum blade tip height of 335 metres (m) above Lowest Astronomical Tide (LAT) and maximum rotor diameter of 310m.

The MOD responded to the original consultation on 21 February 2023 with an objection on the grounds the proposed development would cause unacceptable interference to the performance of Air Defence (AD) radars sited at Remote Radar Head (RRH) Buchan and RRH Brizlee Wood, and an Air Traffic Control (ATC) radar sited at Leuchars Station. Following this the applicant entered into discussions with the MOD on how the impact of the development on the Radars could be mitigated and agreement was reached on mitigation which enabled the MOD to remove its outstanding objections to the proposed development. On 12 June 2025 the MOD provided an updated response confirming that it was in a position to remove the AD and ATC objections subject to conditional requirements.

Conditional requirements to provide radar mitigation were attached to the Section 36 Consent granted 31 July 2025 at conditions 22 (AD) and 24 (ATC). In addition conditions covering the MOD's requirement for the WTGs to be installed with aviation warning lighting and charted were also applied to the consent – conditions 21 (Aviation Lighting) and 34 (Aviation Charting and Safety Management).

Through the Section 36C and Marine Licence Variation of Consent applications it is proposed to allow the development of the Berwick Bank Wind Farm to be delivered through a phased approach. Variations are requested to:-

- allow for the discharge of conditions for each proposed phase, as opposed to the Development as a whole
- correct discrepancies in the co-ordinates in the offshore transmission infrastructure (part 1) and offshore transmission infrastructure (part 2) marine licences.

The MOD has assessed the proposed changes to conditions 21 and 34 and can confirm that the MOD has no objections to the proposed varied condition wording. The MOD's radar mitigation conditions (22 and 24) are not proposed to be varied as part of this application, and their wording remains unchanged. Provided these conditions are carried over to any new consent granted as a result of this consultation the MOD have no objection to this application to vary the s36C and Marine Licences.

With regards to the correction of the co-ordinate discrepancies; the MOD has checked the corrected co-ordinates and these do not change the MOD's position to this development

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours faithfully

[Redacted]

Assistant Safeguarding Manager

Scottish Fishermen's Federation

From:	**[Redacted]**
To:	MD Marine Renewables
Cc:	Mohammad Fahim Hashimi
Subject:	Re: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026
Date:	18 June 2026 14:49:15
Attachments:	image.png Outlook-A picture .png

To the Licencing Officer for this case:

The Scottish Fishermen's Federation (SFF) welcomes the opportunity to comment on the proposed variation to the Section 36 consent and associated marine licences for Berwick Bank Wind Farm. While SFF recognises that phased development can be appropriate for projects of this scale, the proposed variation represents a substantive shift from a project wide framework to a phase by phase approach to the discharge of conditions, including those central to fisheries management and impact mitigation. This approach is reflected consistently across the Section 36 consent and associated marine licences indicating a fundamental change in how the development is controlled and implemented. SFF is concerned that this approach reduces clarity on the overall development and makes it more difficult to assess impacts on commercial fisheries in the round. In particular, key elements of the project including cable routing, infrastructure layout and construction sequencing will be determined at later stages through phase specific approvals. This creates uncertainty around the location, timing and duration of works and limits the ability of fisheries stakeholders to understand how the development will interact with fishing activity over its full lifetime. The application does not include a fisheries specific assessment of phasing related effects and therefore does not demonstrate that impacts associated with extended construction periods, overlapping phases or rolling spatial displacement will remain consistent with those previously assessed, despite the introduction of phasing as a new pathway of impact.

SFF is also concerned that the proposed phase by phase discharge of key plans including the Fisheries Management and Mitigation Strategy, Cable Plans and Vessel Management Plans, fragments what were originally project wide mitigation and control mechanisms. This is particularly significant in the context of offshore transmission infrastructure where cable routing, burial and protection measures are to be defined on a phase by phase basis with no clear requirement for a coherent, project wide strategy. This introduces uncertainty in relation to seabed interaction, potential gear conflict and long-term access to fishing grounds. While the variation requires each phase to remain within the overall design parameters of the development, this does not address how impacts arising from sequencing, duration and overlap of activities will be managed across the development as a whole. The absence of a clear mechanism to assess and manage cumulative impacts on commercial fisheries across all phases represents a material gap.

SFF also notes that the variation includes corrections to coordinates within the offshore transmission infrastructure marine licences. While these are presented as minor, administrative amendments with no new environmental effects, no information is provided to demonstrate that such changes do not alter interactions with fishing grounds, including established trawl routes or static gear areas. SFF considers that this should be clearly evidenced.

SFF does not object in principle to phased development. However, in its current form, the variation introduces increased uncertainty, defers key design decisions and weakens the project wide framework under which impacts were originally assessed. SFF therefore considers that any approval of the variation should be subject to safeguards to ensure: a clear overarching fisheries framework, explicit assessment and management of cumulative impacts and sufficient upfront definition of key

parameters influencing fisheries interaction, particularly in relation to cable routing and seabed disturbance.

Regards,
[Redacted]

Offshore Consents Assessments Manager

Scottish Fishermen's Federation
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Registered Address | Scottish Fishermen's Federation (SFF) | 24 Rubislaw Terrace | Aberdeen | AB10 1XE

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From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: Thursday, May 07, 2026 15:54
To: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Subject: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation – Response Required by 18 June 2026

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Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Generating Stations (Applications for Variation of Consent) (Scotland)

Natural England

From: [Redacted]
To: [Redacted]

Subject: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm – Section 36 Consent and Marine Licence Variations - Phasing Variation
Date: 22 June 2026 11:29:04
Attachments: image001.png
image003.png

Dear Marine Renewables.

Apologies for the delay in getting back to you.

Our understanding is that the installation of Berwick Bank will be carried out in phases and the applicant is requesting that conditions can be discharged in matching phases. We do not have comment on this as the conditions relate to Scottish waters, we defer to NatureScot and other Scottish advisers on these matters. There is one exception to this. We advise that condition requiring a Seabird Compensation Plan (to compensate for Adverse Effects on Integrity of Special Protection Areas) must be developed for the whole project (ie *not* phased).

Best wishes.

[Redacted]

NatureScot

NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

[Redacted]
Marine Licensing Casework Officer
Marine Directorate – Licensing Operations Team
Scottish Government
Marine Laboratory, Aberdeen
AB11 9DB

24 June 2026

Our ref: CNS/REN/OSWF/Berwick Bank – Post Application

Dear [Redacted]

BERWICK BANK WIND FARM LIMITED – BERWICK BANK WIND FARM – SECTION 36 CONSENT AND MARINE LICENCE VARIATIONS – PHASING VARIATION

Thank you for your consultation on the 7th of May on the proposed Section 36 variation for the Berwick Bank Wind Farm Limited (BBWFL) project. We have reviewed the application letter (BK-SSE-000-CON-COR-0019), Ornithological Addendum (BK-SSE-000-CON-TCN-00001), proposed Marine Licence Variation - Generating Station (previously 00010189), proposed Marine Licence variation – Offshore Transmission Infrastructure (OTI) Part 1 (previously 00010190), proposed Marine Licence variation - OTI (Part 2) (00010191) and the Section 36 Consent – proposed variation, and provide our advice below.

Variation proposal

The variation request is to:

- Allow for the discharge of conditions for each proposed phase of the development of the Berwick Bank Wind Farm (BBWF), as opposed to the development as a whole and;
- To correct discrepancies in the co-ordinates included in the offshore transmission infrastructure (part 1) and offshore transmission infrastructure (part 2) marine licences.

Background

The existing Section 36 and Marine Licence consents allow for the BBWF to be delivered as a single development. BBWFL are seeking to vary these consents / licences to allow construction in phases (Phase A, B and C). This phased approach takes account of the staged grid connections at Branxton (East Lothian, Scotland) and Blyth (Northumberland, England), as well as reflecting supply chain constraints. Phase B will be the first phase to be built (236.5km^2), followed by Phase A (285.7km^2) and Phase C (488.7km^2).

BBWFL are seeking amendments to the existing S36 consent and Marine Licences, to allow for relevant conditions to be discharged according to each proposed phase of development, rather than in relation to the whole development.

This variation does not seek to amend any aspect of the Project Design Envelope (PDE) as assessed in the Environmental Impact Assessment Report (EIAR), and the original proposed construction period of eight years remains unchanged.

Instead, by separating the development into phases, the original wind farm becomes three distinct wind farms, with greater clarity on timescales for final commissioning as well as changes from construction to operational periods in comparison to the original application. Other offshore wind projects in Scottish Waters have chosen to split up their array area into phases and have done so via separate Section 36 / Marine Licence applications (e.g. North and South). This approach differs from that of BBWFL as it considers the cumulative and in-combination impacts of having separate wind farms. We understand that Marine Directorate have confirmed with BBWFL that an Environmental Impact Assessment (EIA) is not required to support this variation.

An Ornithological Addendum has been prepared by BBWFL to review whether the conclusions of Marine Directorate's initial Appropriate Assessment (AA) remain valid. BBWFL conclude that the statutory tests under the Habitats Regulations continue to be met, and that the variation can be determined without the need for a new AA – please see advice below.

NatureScot advice

Duration of the Consent and Commencement of Development

Our understanding of the variation proposed is that each phase of development will remain operational for a period of 35 years, as per the original consents, following final commissioning of that specific phase. For example, Phase B is anticipated to become operational by 2030, resulting in decommissioning of that phase by 2065 – which would be earlier than phases A and C. This is our assumption, please confirm.

Were the operational period to commence from the commissioning of the final phase of development (i.e., Phase C), then the overall operational lifespan, and thus timespan of impacts, of previously commissioned phases would exceed 35 years. This would result in additional and therefore unaccounted for operational collision and distributional response impacts.

As a result, we raise concerns with Section 1 of Annex 2 – 'Section 36 Consent Conditions' as currently written, which state *"The consent is for a period of 35 years from the date of Final Commissioning of the Development".*

We advise this should be amended to *"The consent is for a period of 35 years from the date of Final Commissioning of each Phase of Development".*

Given the magnitude of impact predicted from this development as a whole and its influence on compensation requirements within Scottish Waters and beyond, we are concerned with wider industry ramifications with respect to available capacity and compensation should subsequent later phases not progress. Greater assurance around the progression and build out of future phases could be addressed through amendment to the proposed variation condition wording. For example, "The Commencement of each subsequent Phase of the Development must be no later than XX years from

the date of the Commencement of the previous Phase". Or "The Commencement of each subsequent Phase of the Development must be no later than XX years from receipt of a grid connection offer as it relates to that Phase"

Ornithological Addendum

The Ornithological Addendum reviews the original conclusions of the AA and concludes that the phasing variation does not give rise to any new or materially different effects on the integrity of European Sites, both alone and in-combination. On reflection, **we do not consider sufficient evidence has been presented to be able to agree with this position** or to support the requirement to validate the original AA conclusions (which are specific to individual SPAs and their qualifying features). In our view, **specific elements of the assessment require further consideration**, as outlined below.

Phased development could apportion impacts differently

The Berwick Bank array area is used by a significant number of multiple seabird species from multiple SPA colonies up and down the East coast of Scotland / England. The original baseline data and more recent tracking data from relevant SPAs (collected via Forth and Tay Regional Advisory Group (FTRAG), e.g. Bogdanova et al. 2022[1]) indicates substantial variation in the density of birds across this site as well as variation in colony origin. This suggests birds from one colony are using closer areas of the development site, while birds from a different colony are using other areas closer to their colony of origin.

The original assessment apportioned impacts to a suite of SPA colonies from the entire array area e.g. site-wide mean density for use in CRM, site-wide mean seasonal peak for use in the matrix approach for distributional responses and site-wide apportioning which includes consideration of colony distance. The division of the site into phase-specific areas, will result in birds in those areas originating from different colonies and at different densities, therefore each phase may have a different level of predicted mortality apportioned to different SPAs, compared to the original AA conclusions. Without further analysis to compare this we cannot be certain of the implications for delivery of compensation for each phase and we have concerns that insufficient compensation will be delivered for Phase B and Phase A timeously.

Compensation allocation

The approach outlined within the Addendum for the allocation of compensation on a phased basis (via an area proportional estimate, as outlined in Appendix A of the OA) does not sufficiently consider the heterogeneity of bird distribution across the site. This could mean, even if the total (summed) impact from all three phases is the same, if the apportioning per phase is not sufficiently reflective of site usage, then earlier phases could have a disproportionately higher impact, which may not be met through sufficient compensation for that phase.

Given our concerns, we request consideration is required to be given to compensation delivery, proportionate to the predicted impact allocated to each phase. Ideally this would be based on reanalysis of the Digital Aerial Survey data to inform the appropriate allocation of compensation based on each phases predicted impact.

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[1] Bogdanova et al. 2022. Seabird GPS tracking on the Isle of May, St Abb's Head and Fowlsheugh in 2021 in relation to offshore wind farms in the Forth/Tay region. Available online: https://marine.gov.scot/sites/default/files/seabird_gps_tracking_on_the_isle_of_may_fowlsheugh_and_st_abbs_head_in_2021_in_relation_to_offshore_wind_farms_in_the_forth-tay_region.pdf

In-combination implications

The scale of the predicted mortality from BBWF and its subsequent influence on in-combination impacts for other ScotWind and INTOG developments as well as the Sectoral Marine Plan is such that we consider it critical to fully understand what the proposed phasing variation means.

Next steps

The conclusions of the original AA are predicated on the use of the CRM, matrix approach and assuming a homogenous distribution across the proposed phases. Considering the volume of information gathered and publicly available from the Outer Forth / Forth and Tay Region (e.g., via FTRAG), there is an opportunity to identify a more accurate proportion of compensation required for each phase by undertaking a re-assessment using updated FTRAG bird distribution data and revised apportioning. This could include utilisation of SeabORD to explore relative use of each phase, making use of available tracking data.

We are happy to discuss how updated assessments could be undertaken to validate the conclusions of the original AA for the proposed phased build out and ensure compensation requirements are adequately met.

Please contact **[Redacted]** in the first instance for any further advice, copying in our marine energy mailbox – marineenergy@nature.scot .

Yours sincerely,

[Redacted]

Head of Marine Energy – Sustainable Coasts and Seas

Chamber of Shipping

From:	**[Redacted]**
To:	MD Marine Renewables
Subject:	RE: 00013351 / 00013352 / 00013352 – Berwick Bank Wind Farm Limited – Berwick Bank Wind Farm - Section 36 Consent and Marine Licence Variations - Phasing Variation - Consultation
Date:	22 June 2026 09:27:51
Attachments:	image002.png image005.png image006.png

Dear Marine Renewables,

Yes the UK Chamber of Shipping confirms a nil return to this variation.

Kind regards,

[Redacted]

[Redacted]

Policy Director, Shipping Industry & Research
UK Chamber of Shipping
30 Park Street, London, SE1 9EQ

DD: +44 (0)20 7417 2843
[Redacted]

www.ukchamberofshipping.com

Scottish Seabird Centre

Scottish Seabird Centre

The Harbour
North Berwick
EH39 4SS
T: 01620 890 202
info@seabird.org

Marine Directorate Licensing Operations Team,
Scottish Government, 375 Victoria Road,
Aberdeen, AB11 9DB.
md.marinerenewables@gov.scot

Phasing Variation Application by Berwick Bank Wind Farm: Objection

The Scottish Seabird Centre objects to the application by Berwick Bank Wind Farm Limited to vary its Section 36 Consent and associated Marine Licences to allow for a phased approach to seabird compensation.

We recognise the importance of renewable energy and support the development of the offshore wind sector given the vital contribution it could make to delivering on our climate change ambitions. However, we believe it is critical that this ambition is delivered in harmony with nature.

Berwick Bank is set to be located on a critical and sensitive site for seabirds, and we consider its projected impact, as detailed in the Environmental Impact Assessment, to be entirely unacceptable and that alternative lower impact sites for offshore wind development exist. This was detailed in our objection to the development, lodged with the Scottish Government on 31 March 2023[1], and in our letter to the First Minister in collaboration with other conservation charities on 23 April 2025[2].

While we were deeply disappointed by the Scottish Government's decision to consent Berwick Bank in August 2025, we noted that this consent was at least conditional on a Seabird Compensation Plan being submitted and approved by Scottish Ministers. Though we do not consider it possible from an ecological perspective to compensate for the levels of impact that Berwick Bank is projected to have, this condition provides an opportunity to test this assumption and for Ministers to further assess the overall impacts of this development before it is permitted to proceed.

Allowing the Seabird Compensation Plan requirement to be salami-sliced into three separate plans undermines this safeguard for the following reasons:

- **Confidence in the compensation plan is further weakened**. Once part of the project proceeds, the developer's commitment to the remaining phases inevitably deepens, but with no agreement with the Scottish Government over how its impact will be compensated for and how the costs associated with compensation will be met. Delaying that agreement inevitably further weakens confidence that future compensation plans will be fit for purpose.

[1] https://bit.ly/4fNsMBD
[2] https://bit.ly/4gr03mj

- **Project impacts should always be considered in full and compensated for holistically.** Three separate compensation plans delivered in phases risks gaps, creates uncertainty and deviates from best practice, specifically that compensation should be secured and financed in advance of a project proceeding.
- **Monitoring and adaptive management is ignored.** Arguably, the only advantage that phasing the compensation plan could have would be that it allows for monitoring and adaptive management. Yet this does not appear to be part of the developer's proposals. At the very least, we would expect a commitment to publishing post-construction monitoring of the impacts of the first phase in advance of the development of the second phase compensation plan, and an assurance that this data will inform any subsequent plan and decision to proceed with further phases.

Finally, we note that the developer has requested that the derogation be updated to reflect the change in offshore policy context since their submission in December 2022. It is important to note that biodiversity policy has also changed in this time. Key changes that appear to be incompatible with the level of impact expected by Berwick Bank include:

- The Scottish Biodiversity Strategy to 2045[3], published in November 2024, which set the ambition for Scotland to be Nature Positive by 2030, and to have restored and regenerated biodiversity across the country by 2045.
- The Natural Environment (Scotland) Act, passed by the Scottish Parliament in March 2026, enshrined this goal in legislation and established a new framework to support its delivery.
- The Scottish Seabird Conservation Action Plan, published in August 2025, sets a vision that "By 2045, Scotland's seabird colonies are thriving and showing improved resilience to climate change with increases in abundance and breeding success since Seabirds Count (2023)" and commits to a suite of activities to deliver this.

Seabird population data has also been updated since 2022. In particular, the latest Scottish Biodiversity Indicator for seabirds was updated by NatureScot, showing a continued decline in Scotland's seabird populations[4]. Avian flu has also had a devastating impact on some sites and species. Our own work, carried out in partnership with the University of Edinburgh, the UK Centre for Ecology & Hydrology, and Edinburgh Napier University, found that the Bass Rock gannet population has declined by 30% compared with the last complete colony count before the disease outbreak (2014). This represents a loss of over 22,000 breeding sites – potentially as many as 45,000 birds[5]. Studies have estimated that Bass Rock will take almost two decades to recover to pre-avian flu levels[6].

[3] https://www.gov.scot/publications/scottish-biodiversity-strategy-2045/pages/2/
[4] https://www.nature.scot/doc/scottish-biodiversity-indicator-numbers-and-breeding-success-seabirds-1986-2023
[5] https://www.seabird.org/conservation/bass-rock-colony-counts
[6] https://www.sciencedirect.com/science/article/pii/S0006320726001989?via%3Dihub

Offshore wind pressures will compound this situation. According to the Scottish Ministers' Derogation Case for Berwick Bank, up to 256 Bass Rock gannets are expected to be killed per year by the development.

I hope that careful consideration will be given to this objection. We understand that offshore wind is a great opportunity for Scotland, and we believe that this opportunity can be taken without unacceptable impacts on nature, but only if nature is truly valued in decision-making.

Yours,

[Redacted]

[Redacted]

Scottish Wildlife Trust

Marine Directorate Licensing Operations Team,
Scottish Government, 375 Victoria Road,
Aberdeen, AB11 9DB.
md.marinerenewables@gov.scot

Scottish Wildlife Trust

Phasing Variation Application by Berwick Bank Wind Farm Response

The Scottish Wildlife Trust objects the application submitted by Berwick Bank Wind Farm Limited to Scottish Ministers for a variation to the existing Section 36 Consent - to construct and operate the offshore generating station, Berwick Bank Wind Farm ('Berwick Bank').

The Scottish Wildlife Trust recognises that renewable energy development is vital to the Scottish Government's commitment to achieving net zero emissions by 2045. However, renewable energy developments must be located and designed appropriately to minimise harm to nature, which is in crisis, and to the wider environment. Given Berwick Bank's proximity to one of the world's most important and sensitive seabird colonies, and its projected detrimental impacts on these populations, the Scottish Wildlife Trust strongly objects to the development. Furthermore, failing to pursue lower-impact alternative sites is entirely unacceptable and places further pressure on already declining seabird populations.

We have previously outlined our position in previous letters. But, as our concerns are not being addressed, we want to re-iterate:

1) **The ecological impact of Berwick Bank is utterly unacceptable on internationally important seabird populations**. The scale and location of Berwick Bank will cause significant mortalities on seabirds via collision, displacement and the greater cumulative risk for key species.
2) **Berwick Bank forsakes several national and global nature commitments.** Furthermore, since the application was submitted in December 2022, offshore policy and wider government commitments have changed significantly of particular note is the passing of the Natural Environment (Scotland) Act[1].
3) **Less impactful alternatives to Berwick Bank exist.** Our objection to Berwick Bank is fundamentally a location issue, the Scottish Wildlife Trust recognises the need for renewables in the right space and at the right scale. However, Berwick Bank location and design have not been adequately prioritised for nature.

The Scottish Wildlife Trust also have concerns regarding the approach of phased development plan. While we do not agree to a compensation plan being implemented as we do not believe it is ecologically possible, we have concerns that phasing the project would further weaken this approach.

Berwick Bank's impacts should be looked at as a whole and not as small pieces. But the current plans split compensation into three phases, which creates uncertainty and risks weakening requirements over time. Without a clear plan for how compensation will actually be delivered, this phased approach could let the project be approved bit by bit, reducing pressure for a full, end-to-end solution.

We understand the need for renewable development, however, not at the expense of our national and global nature responsibilities. To fully address the twin reinforcing crises of the Global Climate Emergency and the Nature Emergency, must both be prioritised – particularly when other options do exist.

[1] Natural Environment (Scotland) Act 2026

Regards,

[Redacted]

The Scottish Wildlife Trust

Member of the public 80 - 136

[Redacted]

From: [Redacted]
Sent: 10 June 2026 16:04
To: MD Marine Renewables
Cc: [Redacted]
Subject: Berwick Bank Wind Farm

Categories: Saved in eRDM, Added to Tracker
Objective: -1

Dear folks, Let's make money....damn the wildlife/seabirds that are in your way! We are already seeing how short term greed is affecting over longer time, vast structures of society and the environment. We are already one of the poorest nations for wildlife, and you are continuing to ignore its depletion. Why cannot this development be MOVED away from sea bird colonies and sea bird lanes?
Yours sincerely, [Redacted]

[Redacted]

From: [Redacted]
Sent: 10 June 2026 20:48
To: MD Marine Renewables
Subject: Objection to SSE Renewables' Application to Phase the Berwick Bank Offshore Wind Farm Consent

Categories: Saved in eRDM, Added to Tracker
Objective: -1

This amendment asks you to weaken the only condition that made the original consent defensible. I urge you to refuse it. The arguments below set out why - ecologically, economically, and ethically - this is the wrong decision

Dear Marine Directorate,

I write as a private individual and concerned citizen to register my strong objection to SSE Renewables' application to amend the planning consent for the Berwick Bank offshore wind farm by splitting the project into three separately compensated phases. I am not affiliated with any conservation organisation in submitting this response; this objection reflects my personal and professional concern for Scotland's natural environment and the long-term wellbeing of its people.

I would ask you to consider the following grounds for refusal.

THE ECOLOGICAL CASE IS OVERWHELMING

Berwick Bank was already a deeply controversial consent, approved despite being situated in waters that support some of the most significant seabird colonies in the world. The Scottish Government's own scientific assessment forecast the destruction of thousands of birds annually (Guillemots, Gannets, Kittiwakes, Puffins and Razorbills) with the cumulative mortality over 35 years running into the tens of thousands of protected individuals. The original consent was conditional on full compensation being secured across the entire project before construction began. That condition existed for good reason: it was the minimum safeguard available to a regulator granting consent in the face of such extraordinary predicted harm.

The proposed amendment seeks to lower that bar. By allowing phase-by-phase compensation, SSE Renewables would be permitted to begin construction having secured mitigation for only a fraction of the total projected harm. This is not a technical adjustment; it is a fundamental weakening of the only meaningful protection that seabird populations currently have under this consent.

I urge the Directorate to reject it.

GENE POOL INTEGRITY AND POPULATION VIABILITY

Beyond the raw mortality figures, I am deeply concerned about the impact on genetic diversity and

long-term population viability. Seabird populations in the North Sea are already under sustained pressure from climate-driven shifts in prey availability, avian influenza, and broader habitat degradation. Species like the Kittiwake are not merely declining in number - they are losing the demographic breadth and genetic variation needed to adapt to future change.

We must be clear-eyed about what phased compensation actually means in practice. It means accepting that one of Scotland's most iconic seabird aggregations will be substantially diminished before any meaningful restoration is required. A depleted population cannot simply be restored later. The gene pool cannot be rewound. The ecological principle that must govern decisions of this magnitude is that populations must be kept viable and diverse throughout - not destroyed and then asked to recover.

This is particularly urgent for colonial nesters like Gannets and Kittiwakes, where social behaviour, traditional nesting sites and cultural knowledge passed between generations are themselves part of what makes a colony function. You cannot kill thousands of birds and assume the survivors will simply rebuild as before.

THE ECONOMIC ARGUMENT AGAINST THIS DEVELOPMENT

Proponents of Berwick Bank frequently frame opposition to it as being anti-renewable energy. It is not. It is a recognition that this particular site represents a catastrophic cost-benefit failure, even on purely economic grounds.

Scotland's wildlife tourism sector generates hundreds of millions of pounds annually and employs thousands of people across coastal communities. Research commissioned by the Scottish Government found that marine wildlife tourism alone accounts for tens of millions of pounds of direct spend and over 600 full-time equivalent jobs. Crucially, that research identified seabirds as among the top five most important species cited by Scotland's wildlife tourists. Visitors come specifically for them. They charter boats to Bass Rock. They fill the Scottish Seabird Centre. They sustain the bed-and-breakfasts, the cafes, the local guides and the boat operators of the East Lothian coast.

This is an economy built directly on the existence of thriving seabird colonies. It is not abstract or speculative - it is functioning, proven, and growing. A consent that permits the systematic decimation of the colonies that underpin it is not economically neutral. It inflicts measurable, lasting harm on communities whose livelihoods depend on nature being there.

MENTAL HEALTH AND THE VALUE OF LIVING SEAS

I would also ask the Directorate to weigh something that rarely appears in planning assessments but is increasingly well-evidenced in the research literature: the profound mental health benefit that intact, abundant natural environments provide.

The Mental Health Foundation's research found that 70% of UK adults agree that being close to nature improves their mood, and 49% say it helps them cope with stress. Studies have linked bird abundance specifically - the kind of experience that a Gannet colony or a sea cliff full of Razorbills offers - with reduced levels of depression, anxiety and stress in surrounding communities. These are

not marginal effects. In an era of escalating mental health demand on public services, the value of accessible, high-quality natural spaces is substantial and should be counted.

The seabird colonies of the Firth of Forth are not just ecological assets. They are part of the fabric of life for people who live near them, walk the coastal paths beneath them, and draw meaning and restoration from their presence. Decisions that diminish those colonies diminish something that cannot easily be replaced or compensated - certainly not by the mechanisms currently proposed.

THE RIGHTS OF NATURE

Finally, I would invite the Directorate to consider an emerging but increasingly mainstream framework in environmental law and ethics: the question of whether natural systems and the species that depend on them hold intrinsic rights - not merely instrumental value to humans, but rights of their own.

This is not a fringe position. Robert Macfarlane's 2025 book Is a River Alive? brought this question into wide public discourse, exploring the Rights of Nature movement in which rivers, forests and ecosystems have been granted legal personhood in jurisdictions including New Zealand, Ecuador and Colombia. Drawing on the work of Indigenous botanist and ecologist Robin Wall Kimmerer - whose concept of a 'grammar of animacy' asks us to recognise natural entities as subjects rather than objects - Macfarlane argues that the language and law we use to describe the natural world shapes how we treat it.

We currently have no legal framework in Scotland that recognises the seabird colonies of the Firth of Forth as entities with their own claim on existence. But I would argue that any planning system operating in good faith must at least ask the question: does this development serve the interests of the living world as well as the interests of shareholders? In the case of Berwick Bank, the answer is plainly no.

A development that cannot be made safe for wildlife should not be made at all. Not at this site, not at this scale, and not by hollowing out the one compensatory condition that gave the original consent any moral foundation.

I respectfully request that this application be refused, and that Scottish Ministers be urged to revisit the viability of Berwick Bank as a whole in light of the ongoing inability to identify credible, proportionate compensation for its projected impact.

Thank you for considering this submission.

Yours sincerely,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 11 June 2026 16:15
To: MD Marine Renewables
Subject: Berwick Bank

Categories: Saved in eRDM, Added to Tracker
Objective: -1

I am writing to express my objection to the proposed Berwick Bank windfarm,
Although of course I agree that we need more renewable energy and windfarms are a big part of that they must be sited in the right place that cause as little harm as possible to UK wildlife.
Unfortunately Berwick Bank is planned in the worst possible place near iconic seabird sites like Bass rock.
It is predicted to kill 2,808 guillemots, 261 gannets, 815 kittiwakes, 66 puffins and 154 razorbills in its first year alone. In its lifespan Berwick Bank would kill tens of thousands of birds. That's a staggering amount. I do not believe that amount of birds could ever be compensated for especially if SSE Renewables manage to change the original planning consent.
Some species such as kittiwakes will be pushed ever closer to national extinction.
The risk is too great and as developments are required to avoid harm to wildlife wherever possible Berwick Bank must not go ahead to make way for other less damaging but just as productive sites.
I look forward to your reply.

Regards
[Redacted]

[Redacted]

From: [Redacted]
Sent: 11 June 2026 20:49
To: MD Marine Renewables; Central Correspondence Unit; [Redacted]
Subject: Objection to Berwick Bank offshore windfarm

Categories: Added to Tracker, Saved in eRDM
Objective: -1

To:
The Marine Directorate
Scottish Ministers
Michael Shanks Minister for Energy, UK Government

Dear All

I am writing to object to the proposed Berwick Bank offshore windfarm.

While I do not live in Scotland, I greatly value the natural environment and deeply care for Scotland's seabirds, which are of global importance. Most seabird species breeding in Scotland are already in decline, and this project threatens to exacerbate their plight.

Scotland is globally important for seabirds, with 5 million breeding on our shores, including 60% of the world's great skuas and around half of the world's northern gannets. Seabirds are key to the health and functioning of the marine environment, yet most seabird species in Scotland are in steep decline. Urgent action is needed to reverse this trend, ensuring the recovery of seabird populations and the resilience of marine ecosystems, as well as the coastal communities and economic sectors that depend on them. Berwick Bank offshore windfarm is to be located in a key foraging area for a huge range of species like puffins, gannets and kittiwakes. The developer's own impact assessment projects that the development could kill up to 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills a year. This would make it one of the deadliest windfarms in the world and would be a huge setback for Scotland's natural heritage. Its impacts are so severe, it could fast track species like Kittiwake to local extinction. Now, the developer wants to build this wind farm in phases, making it easier to find compensation for the seabirds that will be killed. That is not acceptable.

Scotland's seas offer vast renewable energy potential, and offshore wind is a key part of the Scottish Government's plan to reach net zero by 2045. However, it is essential that the location, scale, and technology of these developments avoid harming marine ecosystems, especially in the context of the nature crisis. Other projects such as Ossian demonstrate how floating turbine technology, sited further offshore and away from critical seabird habitats, can deliver similar energy benefits to proposals like Berwick Bank but with a lower environmental impact.

I am deeply concerned about the potentially devastating impact that Berwick Bank will have.

This is a key issue for me and many. I am seeking your clear commitment to champion Scotland's seabirds, halt this devastating project and get behind nature positive offshore wind instead.

Regards
[Redacted]

[Redacted]

From: [Redacted]
Sent: 12 June 2026 12:37
To: MD Marine Renewables
Cc: [Redacted]
Subject: Berwick Bank wind farm - objection

Categories: Saved in eRDM, Added to Tracker
Objective: -1

To the Marine Directorate, Scottish Government

We are writing to object to the Berwick Bank Offshore Windfarm project, and to the proposed phasing variation.

Our opposition to the whole project

This message follows our email of 20 March 2024 to Gillian Martin MSP, then Minister for Energy, Just Transition and Fair Work, and the reply from the Marine Directorate Licensing Operations Team of 11 February 2025. In our letter, we wrote:

We support nearly all of the efforts of the Scottish Government to help mitigate and adapt to climate change, including offshore wind farms. We live in St Abbs village and are extremely concerned about the effects of climate change – we are already seeing the effects in the flooding, storms and surges that are affecting our coast in places like Coldingham Bay and in St Abbs itself. However, there are places that are too ecologically and scenically precious for developments like this, and the sea off St Abbs Head is one of them because it is so important to the seabirds breeding in the area. The impacts of the development on the site are too great, there are alternatives, and the mitigation measures do not all stack up.

We continue to hold this view, and our concern has only increased as we have seen at first hand the increasing pressure seabirds are under in this area. Storms earlier this year left shocking numbers of Puffins dead on our coast – we found 23 corpses in one mile of beach in one day, and know that similar finds were made elsewhere, so the total toll must have been many thousands. In summer 2023, many dead and dying Guillemots were beached around St Abbs and Coldingham, apparently due to starvation. Furthermore, a paper just out in the journal *Scottish Birds* (June 2026) showed that mortality caused by the storms of autumn 2023 reduced Aberdeenshire's breeding Shag population by 91%; the situation elsewhere including St Abbs seems to have been about as bad. In these and numerous other incidents, many other seabirds were also affected.

Whatever the species and the causes (including climate change), these events show that our seabirds cannot withstand added mortality on the scale that Berwick Bank would cause. Our nature and climate are in crisis, and are linked. We cannot solve one at the expense of the other.

Request to reject the phasing proposal

We are concerned that the recent request by the applicant to split the project into phases reduces proper scrutiny, and risks underestimation, of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages. We cannot see any justification to (according to the application) "vary the aforementioned consents and licences to allow for discharge of conditions for each proposed phase of development of Berwick Bank Wind Farm, rather than in relation to the development as a whole", other than for the developer to make the compensation measures easier to push through. Assessment of the development "as a whole" is exactly what should happen.

We request that the whole Berwick Bank project is refused permission to proceed, and less damaging alternatives implemented. The variation application should immediately be refused.

Yours sincerely

[Redacted]

[Redacted]

From: [Redacted]
Sent: 12 June 2026 18:47
To: MD Marine Renewables
Subject: Objection to Berwick Bank

Categories: Saved in eRDM, Added to Tracker
Objective: -1

I [Redacted]
object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe given the time since outline approval was given, the evidence and objections from Nature Scot, RSPB and Seabird Centre, MUST be revisited. The analogy is failing to dress for the weather! SG failed to give due consideration and as such, my concern is that the decisionmaking was flawed.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made."

Yours sincerely

[Redacted]

[Redacted]

From: [Redacted]
Sent: 12 June 2026 20:37
To: MD Marine Renewables
Subject: Berwick Bank Windfarm objection

Categories: Added to Tracker, Saved in eRDM
Objective: -1

To whom it may concern

I object strongly to the Berwick Bank Wind Farm Development, both phased development and full development.

I am concerned about the impact of the windfarm on the marine environment.

I am concerned about the impending slaughtering of thousands of seabirds annually from wind turbine blades which in turn affects biodiversity negatively which Scotland can least afford.

I am concerned about visual impact and noise pollution in the area.

I am concerned about shards of blade materials and diesel leakage from the turbines into the water.

I believe there is no need for this massive development as Scotland already produces ten times the energy the country uses and as there is no grid connection in place it creates another situation for constraints payments which the country cannot afford.

[Redacted]

[Redacted]

From: [Redacted]
Sent: 12 June 2026 22:53
To: MD Marine Renewables

Categories: Saved in eRDM, Added to Tracker
Objective: -1

Marine Directorate

I wish to have noted that I strongly object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

I is vitally important that this project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe the project will cause a very serious disruption to the wildlife particularly the Gannet population on Bass Rock but the ecosystem of all the birds and other sea life will be very badly impacted by this project progressing and urgently urge that this project should stop immediately

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Yours expectingly

[Redacted]

Sent via BT Email App

[Redacted]

From: [Redacted]
Sent: 13 June 2026 09:18
To: MD Marine Renewables
Subject: Re: Berwick Bank

Categories: Saved in eRDM, Added to Tracker
Objective: -1

Good morning

I am writing to state my absolute objection to the Berwick Bank wind farm.

Offshore renewables can play a big role in tackling the climate crisis and building a clean, green industry in Scotland. But it must be developed in harmony with nature. The proposed site for Berwick Bank windfarm is off the East Lothian and Fife coast, in an area which is vital for globally important colonies of seabirds. This development threatens to kill tens of thousands of seabirds during its lifetime. It's simply the wrong place for an offshore wind farm.

Already more than half of Scotland's seabird species are in decline, and in recent years some populations have been hit hard by avian flu. The projected impact of Berwick Bank threatens to further fuel declines.

Documents published by the Scottish Government alongside their consent for Berwick Bank highlight some of the most concerning projected mortalities.

It is predicted to kill 2,808 Guillemots, 261 Gannets, 815 Kittiwakes, 66 Puffins and 154 Razorbills in its first year alone, according to the Scottish Government's case assessment. Over its 35-year lifespan, tens of thousands of protected seabirds would be killed. In addition to this many will be displaced, forced to forage elsewhere.

On 1 August 2025 the Scottish Government consented Berwick Bank windfarm. However, that consent is conditional on the developer, SSE, producing a "Seabird Compensation Plan". It is impossible to compensate effectively for the sheer scale of impact that Berwick Bank is expected to have. The Scottish Government needs to recognise that compensation for Berwick Bank is neither plausible not appropriate, and to ensure that the project does not progress. Instead, the Scottish Government should focus its support on the many offshore windfarm proposals that are coming forward in less environmentally sensitive areas. These could generate clean, green electricity in harmony with nature.

Please do not allow this development to go ahead.

Thank you,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 13 June 2026 11:31
To: MD Marine Renewables
Subject: Destroying our wild life and Habitats berwick bank

Categories: Saved in eRDM, Added to Tracker
Objective: -1

Compensation for the slaughter of our wild life who gets the compensation the wild life clean energy at a very high price for nature blades cracking and more micro polluting this needs to be stopped but corporate greed prevails i totally disagree with this project not that you would care profit before conservation regards [Redacted]

[Redacted]

From: [Redacted]
Sent: 15 June 2026 02:09
To: MD Marine Renewables
Subject: objection to Berwick Bank Wind Farm

Categories: Saved in eRDM, Added to Tracker
Objective: -1

Dear Sir / Madam,

I wish to register my strong objection to the proposed phasing variation for the Berwick Bank wind farm.

As someone who lives on the Firth of Forth, I am deeply concerned that splitting this development into separate phases will weaken proper scrutiny of the full environmental and cumulative impacts.

This coastline is not just scenery to me, it is home. It is a living, breathing ecosystem that supports internationally important seabird populations and a fragile marine environment already under pressure. Breaking the project into stages risks hiding the true scale of disturbance to species such as kittiwakes, puffins, gannets and many others that rely on this area for survival. The project should continue to be assessed as one complete development, not carved up in a way that dilutes accountability.

Furthermore, I am extremely worried and angry that this variation could jeopardise the very wildlife that makes the Firth of Forth so special. We are custodians of this coastline and decisions of this magnitude must prioritise long term environmental protection over convenience for developers. For these reasons, I request that the variation application is refused.

At the very least, a full reassessment or public inquiry must be carried out before any decision is made.

Yours sincerely,
[Redacted]

[Redacted]

From: [Redacted]
Sent: 15 June 2026 14:05
To: MD Marine Renewables; michael.shanks.mp@parliament.uk; Central Correspondence Unit
Subject: Berwick Bank objection

Categories: Saved in eRDM, Added to Tracker
Objective: -1

Dear Sir's/Madams,

After reading a report on the proposed reapplication for Berwick Bank by RSPB Scotland, I am writing to encourage you to strongly reject any plans for building the proposed wind farm so near to so many critically endangered seabirds.

Whilst anyone can see the need for green, renewable energy sources, it is imperative that it is done so in a way which minimises the impact on the natural world, especially if the government and charity organisations are already investing money for the protection of the natural world and endangered species.

Please use your vote and influence in the name of being a champion for Scottish wildlife, Scottish tourism, and encourage only companies which intend to work for the natural world and well as for a greener future.

Many thanks,

[Redacted]

[Redacted]

From: [Redacted]

Sent: 16 June 2026 19:37
To: MD Marine Renewables
Subject: object to proposed phasing variation for Berwick Bank Wind farm

Categories: Saved in eRDM, Added to Tracker
Objective: -1

Dear sir/madam

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe the proposed phasing is a deliberate attempt to get around proper scrutiny of the environmental impact.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

kind regards

[Redacted]

[Redacted]

From: [Redacted]
Sent: 16 June 2026 20:18
To: MD Marine Renewables
Subject: Berwick bank

Categories: Added to Tracker, Saved in eRDM
Objective: -1

This disgusting wind farm should not be allowed. The proposed plan shouldn't be split into parts, varying the plan is sneaky and despicable ploy.
Our wildlife can't be destroyed and developers put a pittance of money into an environment fund.
Who came up with such a stupid idea. This shows hos little you think of our wildlife. You should all be ashamed.
Do right thing and move the plans of this killer windfarm elsewhere.

[Redacted]

[Redacted]

From: [Redacted]
Sent: 16 June 2026 20:54
To: MD Marine Renewables
Subject: Berwick Bank Windfarm Objection

Categories: Saved in eRDM, Added to Tracker
Objective: -1

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I am baffled that anything of this sort is allowed altogether. Green energy should not come at a cost of our animal friends and least of all of our beautiful natural environment. This makes it the least green of all.

I request that the variation application is refused, and that a full reassessment/public inquiry is carried out before any decision is made.

With kind regards,

[Redacted]

[Redacted]

From: c [Redacted]
Sent: 16 June 2026 23:17
To: MD Marine Renewables
Subject: Berwick Bank Wind Farm Variation Application - objection

Categories: Added to Tracker, Saved in eRDM
Objective: -1

16/06/26

We write to express our strong objection to the proposed phasing variation for the Berwick Bank wind farm. We are concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages. To depart from this will mean that cumulative impacts will not be properly controlled . The Seabird Compensation Plan needs to be looked at in its entirety - not in phases.

We are concerned that original safeguards are being weakened, reports and data models are no longer valid and that the Environmental Impact Assessment is no longer valid

We request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 06:22
To: MD Marine Renewables
Subject: Berwick Bank Wind Farm

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear Marine Directorate,

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Regards
[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 08:00
To: MD Marine Renewables
Subject: Objection to Berwick Bank

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear Mr. Wallace,

I am writing to raise my objection to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages. I request that the variation application is refused, or that a full reassessment/public inquiry be carried out before any decision is made.

Sincerely,

[Redacted]

Sent from Proton Mail for iOS.

[Redacted]

From: [Redacted]
Sent: 17 June 2026 08:16
To: MD Marine Renewables
Subject: Objection

Categories: Added to Tracker, Saved in eRDM
Objective: -1

objection to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate .

I find it unbelievable that greener energy seems to mean destroying our natural habitat and killing our wildlife on a huge scale. It's just does not equate! It's about time the government listened to the people.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made."

Regards

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 08:25
To: MD Marine Renewables
Subject: Objection to Proposed Phasing of the Berwick Bank Wind Farm

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear Sirs,

I am writing to object to the proposed phasing variation for the Berwick Bank Wind Farm.

Consent to the project has already been granted and the conditions attached to that consent have been assessed based on the full project rather than piecemeal over 3 phases as it is the cumulative effect that is critical.

Splitting it into phases would mean that the Environmental Impact Assessment for the project is no longer valid as that was done for the project as a whole and can't simply be apportioned to each phase. Thus, if the project is to be phased then each phase would need to have its own Environmental Impact Assessment.

All of the reports and data modelling referred to and relied upon by the project as a whole can't simply be apportioned so they too would also be no longer valid and would need to be redone on a phase-by-phase basis.

In particular, the Seabird Compensation Plan needs to be looked at in it's entirety and not in phases. The cumulative impact is critical and the compensation measures, once agreed, simply can't be apportioned or phased.

All the conditions attached to the original consent were imposed to the project as a whole and that was what was originally consented (and agreed to by the developers). It is simply not an option to now slice and dice the consent and thereby the conditions to best suit the developer as this will only weaken the original safeguards and mean the cumulative impacts of the project may no longer be properly controlled.

Throughout this process there has frankly been inadequate public consultation particularly when you compare it to the level of scrutinization that occurred for the Dogger Bank project. Indeed a lot of the points made by various public bodies as regards this project have simply been ignored so I am deeply concerned that splitting the project into phases will further reduce proper scrutiny of the full environmental and cumulative impacts. Thus, the project should continue to be assessed as a whole and not in separate stages.

I request that the variation application is either refused or that a full reassessment of the project (or better still that a public inquiry) is carried out before any decision is made.

Yours sincerely

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 11:09
To: MD Marine Renewables
Subject: Berwick Bank Variation Proposal OBJECTION

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear Sir/Madam,

I am writing to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

I believe that varying the proposal after initial consent is a cynical attempt by the developer to circumvent the conditions imposed and therefore their environmental responsibilities and the requirement for adequate public consultation by attempting to reframe this development avoiding due process for whole project conditions and the necessarily high standards of safeguarding required.

Furthermore, I believe that the previous Environmental Impact Assessment is no longer valid for this variation application, and consequently all related data and conclusions are invalid for a phased development. The Seabird Compensation Plan (SCO) needs to be looked at in its entirety, not in phases as the cumulative impact is critical on entire populations of seabirds in a globally important and environmentally sensitive area.

There are already alternatives to the plans of existing proposal which could be included in an SCP for example include monitoring migrating bird routes and turning off the the turbines at those times, painting one vane of each turbine black to increase visability, etc., many of these best practise features are employed by other best-in-class developers and these could be included in any wind farm proposal with detailed consultation.

If the intention of the developer is now for a phased project they should be seeking approval with an entirely new planning application for each with new EIAs, public consultations, and review by objective ecological experts. The entire project, including all phases should then be reconsidered in its whole for the lifetime impact it will have.

I therefore request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Yours sincerely,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 11:13
To: MD Marine Renewables
Subject: Objection

Categories: Added to Tracker, Saved in eRDM
Objective: -1

I object to the proposed phasing variation for the Berwick Bank wind farm.
I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.
The project should continue to be assessed as a whole, not in separate stages.
Furthermore, I believe The Seabird Compensation Plan needs to be looked at in its entirety - not in phases.
The cumulative impact is important (to prevent displacement).
I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.
Sincerely,
[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 12:16
To: MD Marine Renewables
Subject: Berwick Bank

Categories: Added to Tracker, Saved in eRDM
Objective: -1

I am writing to express my shock and concern over the proposed Berwick Bank wind project. While accepting that wind power is a vital part of energy strategy, there must surely be better locations that will have less impact.

When the developer's own projections show that the project is likely to kill 2,808 Guillemots, 814 Kittiwakes, 260 Gannets, 154 Razorbills, and 65 Puffins in the first year alone, I cannot see how anyone could view that as acceptable.

I have had the privilege of taking a boat that circled Bass Rock – an experience that I will remember with awe for life and the thought of some 2800 gannets being killed every year is just beyond belief. A total of 70% of seabird species are already in decline in Scotland and 62% across the wider UK. It will be impossible to compensate for the ecological devastation that Berwick Bank will bring.

I sincerely hope that the project will be sited elsewhere.

Yours sincerely,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 15:26
To: MD Marine Renewables
Subject: Berwick Bank

Categories: Saved in eRDM, Added to Tracker
Objective: -1

Dear Sir

I am writing with regard to the renewed proposal by SSE Renewables regarding Berwick Bank windfarm.

I object to the proposed phasing variation for the BB Windfarm. I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole and not in separate stages.

It should also be borne in mind that there are already a number of offshore windfarms very nearby.

Furthermore I believe that BB Windfarm is proposed to be built in a completely non viable location and the entire project needs to be reviewed. Our marine life in this area is rare, precious and already struggling and the disruption of such a massive windfarm in the middle of a Special Protected Area is entirely inappropriate. It would be a disaster to lose an entire ecosystem (the RSPB have predicted the extinction of the kittiwakes if this goes ahead). I believe there are other areas along the coast that are not in such a prolific seabird and marine wildlife area. It was designated a Special Protected Area for a very good reason. When the gannets were hit by bird flu it was heartbreaking to see hundreds of birds along our beaches dead or dying. It would be terrible to see the same again due to the windfarm displacing these birds.

We are also lucky enough to have dolphins and other marine mammals nearby. These creatures all need our protection.

I request that the variation application is refused or that a full reassessment / public inquiry is carried out before any decision is made and in fact that the entire project is reviewed.

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 17:12
To: MD Marine Renewables
Subject: Objection to Berwick Bank Windfarm off the coast of East Lothian

Categories: Saved in eRDM, Added to Tracker
Objective: -1

I write to object in the strongest possible terms to the proposed Berwick Bank windfarm off the coast of East Lothian.

My concern is the splitting of the project into phases which will reduce proper scrutiny of the FULL environmental impacts - and particularly the cumulative impact - on seabirds and the marine environment.

I ask that the project is assessed as a whole rather than in smaller packaged stages and that the variation application is refused. Further, I ask that a public enquiry is held before any decision is made.

I fear that we forget to take into account the impact of such developments to other inhabitants. We share this planet. And - while developments may be necessary - it is our duty to ensure that the proposed location has minimal impact on all species. This is not the case with Berwick Bank and I pray that common sense prevails.

Thank you for your consideration.

Best wishes
[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 18:17
To: MD Marine Renewables
Subject: OBJECTION: Berwick Bank Wind Farm - Section 36 Consent Variation Application

Categories: Added to Tracker, Saved in eRDM
Objective: -1

To the Marine Directorate Licensing Operations Team

I am writing to formally log my objection to the Section 36 Consent Variation Application submitted by Berwick Bank Wind Farm Limited regarding the proposed phased rollout. My objection is based on the following critical grounds:

Ecological Risk Acceleration: Transitioning to a phased construction approach allows the developer to bypass immediate, comprehensive environmental accountability. Splitting the project into smaller chunks dilutes the necessary ecosystem-wide oversight needed to protect vulnerable marine life.

Severe Threat to Protected Seabirds: The project location heavily overlaps vital, globally significant foraging grounds for protected seabird species. The proposed variation does nothing to lessen the high avian mortality risks already identified by conservation groups like RSPB Scotland.

Inadequate Mitigation Timelines: A phased development schedule means that crucial environmental compensation measures will be rolled out reactively rather than proactively, exposing local wildlife to immediate harm before safeguards are adequately established.

I request that the Scottish Ministers reject this variation application and hold the developer strictly accountable to the full, un-phased environmental obligations originally demanded.

Please confirm receipt of this representation and ensure it is filed ahead of the June 18, 2026 deadline.

Thank you.

Your sincerely

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 18:37
To: MD Marine Renewables
Subject: FORMAL OBJECTION: Berwick Bank Offshore Wind Farm - Variation Application

Categories: Added to Tracker, Saved in eRDM
Objective: -1

To the Marine Directorate Licensing Operations Team,

I am writing to register my strong objection to the proposed variation to the Section 36 consent for the Berwick Bank Wind Farm regarding a phased approach to development.

I am deeply concerned about this application for the following reasons:

- **Dilution of Environmental Oversight:** Allowing the project to be split into separate phases creates a fragmented regulatory process. This reduces transparency and makes it harder to assess the cumulative, devastating impact on the marine environment.
- **Unacceptable Avian Mortality Rates:** The outer Firth of Forth is a critical feeding ground for internationally protected seabirds, including kittiwakes and gannets. The proposed variation fails to address the high risk of bird strikes and habitat disruption highlighted by conservation bodies.
- **Delayed Ecological Protection:** Phasing the project allows the developer to defer critical environmental conditions and compensation schemes. Safeguards must be fully secured upfront for the entire project, not rolled out incrementally after damage has already occurred.

For these reasons, I urge the Scottish Ministers to refuse this variation application and uphold the strict, comprehensive environmental standards originally required.

Kindly acknowledge receipt of this email and log it as a formal objection before the June 18, 2026 deadline.

Yours sincerely,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 19:42
To: MD Marine Renewables
Subject: Subject: OBJECTION: Berwick Bank Wind Farm - Section 36 Consent Variation ApplicationTo the Marine Directorate Licensing Operations Team I

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Added to Tracker, Saved in eRDM
Objective: -1

-
Subject: OBJECTION: Berwick Bank Wind Farm - Section 36 Consent Variation ApplicationTo the Marine Directorate Licensing Operations Team

I am writing to formally log my objection to the Section 36 Consent Variation Application submitted by Berwick Bank Wind Farm Limited regarding the proposed phased rollout of the project. My opposition is based on the following critical grounds:

Erosion of Environmental Accountability: The transition to a phased construction approach dilutes the comprehensive, ecosystem-wide oversight required to protect vulnerable marine life. By fragmenting the construction timeline, the developer bypasses immediate accountability and introduces reactive mitigation, risking immediate harm to local wildlife before safeguards are established.

Material Departure from Original Consent: Berwick Bank was presented and approved in 2025 as a single, integrated development. Shifting to a phased methodology is a material change to the original assessment. Because the impacts on protected sites and seabirds are inherently cumulative, fragmenting the construction fundamentally undermines the validity of the ecological baselines and compensatory measures relied upon in the decision.

Threats to Globally Significant Seabirds: The project location heavily overlaps vital foraging grounds for protected avian species. The variation application fails to introduce new or revised compensation requirements to mitigate the acknowledged high avian mortality risks raised by conservation groups, including RSPB Scotland and the National Trust for Scotland.

Lack of Revised Compensation: Since Ministers originally approved the development despite acknowledged adverse effects on protected sites—basing the decision on overriding public interest and strict compensatory measures—any variation altering project delivery must be subjected to the highest scrutiny. The variation appears to offer no revised assessment of these required compensatory measures in light of the new phasing strategy. No compensatory measures from the original 2025 consent have been forthcoming.

Strengthened Case for a Public Local Inquiry: The original Section 36 consent was determined without a Public Local Inquiry. This is a highly controversial project of exceptional magnitude—and phasing represents a material change to the original assumptions, the complex scientific and environmental concerns must be properly examined through a transparent, fully scrutinized public inquiry. A project that was justified by the developers and ministers on the basis of its ‘claimed’ overall impacts and ‘claimed’ public benefits should not be permitted to alter those assumptions through a variation application.

I respectfully request that the Scottish Ministers refuse this variation application and require a full reassessment of the project as a whole.

Additionally, I have requested relevant information relating to objections under the Freedom of Information (Scotland) Act 2002.

Please confirm receipt of this OBJECTION , ensure it is FILED ahead of the 18 June 2026 deadline, and confirm it will be ACTIVELY CONSIDERED during the determination process.

Yours faithfully

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 19:49
To: MD Marine Renewables
Subject: Subject: OBJECTION: Berwick Bank Wind Farm - Section 36 Consent Variation Application To the Marine Directorate Licensing Operations Team

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Saved in eRDM, Added to Tracker
Objective: -1

Subject: OBJECTION: Berwick Bank Wind Farm - Section 36 Consent Variation ApplicationTo the Marine Directorate Licensing Operations Team

I am writing to formally log my objection to the Section 36 Consent Variation Application submitted by Berwick Bank Wind Farm Limited regarding the proposed phased rollout of the project. My opposition is based on the following critical grounds:

Erosion of Environmental Accountability: The transition to a phased construction approach dilutes the comprehensive, ecosystem-wide oversight required to protect vulnerable marine life. By fragmenting the construction timeline, the developer bypasses immediate accountability and introduces reactive mitigation, risking immediate harm to local wildlife before safeguards are established.

Material Departure from Original Consent: Berwick Bank was presented and approved in 2025 as a single, integrated development. Shifting to a phased methodology is a material change to the original assessment. Because the impacts on protected sites and seabirds are inherently cumulative, fragmenting the construction fundamentally undermines the validity of the ecological baselines and compensatory measures relied upon in the decision.

Threats to Globally Significant Seabirds: The project location heavily overlaps vital foraging grounds for protected avian species. The variation application fails to introduce new or revised compensation requirements to mitigate the acknowledged high avian mortality risks raised by conservation groups, including RSPB Scotland and the National Trust for Scotland.

Lack of Revised Compensation: Since Ministers originally approved the development despite acknowledged adverse effects on protected sites—basing the decision on overriding public interest and strict compensatory measures—any variation altering project delivery must be subjected to the highest scrutiny. The variation appears to offer no revised assessment of these required compensatory measures in light of the new phasing strategy. No compensatory measures from the original 2025 consent have been forthcoming.

Strengthened Case for a Public Local Inquiry: The original Section 36 consent was determined without a Public Local Inquiry. This is a highly controversial project of exceptional magnitude—and phasing represents a material change to the original assumptions, the complex scientific and environmental concerns must be properly examined through a transparent, fully scrutinized public inquiry. A project that was justified by the developers and ministers on the basis of its ‘claimed’ overall impacts and ‘claimed’ public benefits should not be permitted to alter those assumptions through a variation application.

Please also note my concerns that the public notice for this application was not widely publicised. It was almost impossible to find a link to it and a demonstrable lack of available information in locations likely to

be highly affected. This is troubling to the public and should be equally troubling to ministers. It is yet another example of the developer's box ticking tactics.

I respectfully request that the Scottish Ministers refuse this variation application and require a full reassessment of the project as a whole.

Additionally, I have requested relevant information relating to objections under the Freedom of Information (Scotland) Act 2002.

Please confirm receipt of this OBJECTION, ensure it is FILED ahead of the 18 June 2026 deadline, and confirm it will be ACTIVELY CONSIDERED during the determination process.

Yours faithfully
[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 20:07
To: MD Marine Renewables
Subject: Objection to the proposed phasing variation for the Berwick Bank wind farm.

Importance: High

Categories: Saved in eRDM, Added to Tracker
Objective: -1

I write to strongly object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds, and our marine and surrounding environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe:

- The Environmental Impact Assessment, reports and models are no longer valid
- The Seabird Compensation Plan needs to be looked at in its entirety - not in phases. The cumulative impact is important (to prevent displacement).
- The project was consented as an integrated whole - not in phases
- Conditions were imposed holistically - so needs to be readdressed
- Cumulative impacts may no longer be properly controlled

- Seabird and marine ecology concerns
- Weakening of original safeguards
- Inadequate, meaningful public consultation

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

Sent via BT Email App

[Redacted]

From: [Redacted]
Sent: 17 June 2026 20:15
To: MD Marine Renewables
Subject: Objection to Berwick Bank wind farm

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear sir,

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.
The project should continue to be assessed as a whole, not in separate stages.

Working for a marine conservation charity; looking at data captured and discussing concerns with fellow staff members, we are all worried about the impact this is going to have on populations of seabirds already in decline, with majority already on endangered lists and how this is going to affect the wider marine environment.

I understand greener energy is the way forward however, this area in the Forth is not the right place for this proposed wind farm.
The Environmental Impact Assessment is no longer valid and the Seabird Compensation Plan needs looked at again in its entirety, not in phases.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Thank you for your time.

Regards,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 20:32
To: MD Marine Renewables
Subject: Subject - OBJECTION: Berwick Bank Wind Farm

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Added to Tracker, Saved in eRDM
Objective: -1

To the Marine Directorate Licensing Operations Team

RE: OBJECTION to Berwick Bank Wind Farm - Section 36 Consent Variation Application

I am writing to formally log my objection to the Section 36 Consent Variation Application submitted by Berwick Bank Wind Farm Limited regarding the proposed phased rollout of the project. My opposition is based on the following critical grounds:

Erosion of Environmental Accountability: The transition to a phased construction approach dilutes the comprehensive, ecosystem-wide oversight required to protect vulnerable marine life. By fragmenting the construction timeline, the developer bypasses immediate accountability and introduces reactive mitigation, risking immediate harm to local wildlife before safeguards are established.

Material Departure from Original Consent: Berwick Bank was presented and approved in 2025 as a single, integrated development. Shifting to a phased methodology is a material change to the original assessment. Because the impacts on protected sites and seabirds are inherently cumulative, fragmenting the construction fundamentally undermines the validity of the ecological baselines and compensatory measures relied upon in the decision.

Threats to Globally Significant Seabirds: The project location heavily overlaps vital foraging grounds for protected avian species. The variation application fails to introduce new or revised compensation requirements to mitigate the acknowledged high avian mortality risks raised by conservation groups, including RSPB Scotland and the National Trust for Scotland.

Lack of Revised Compensation: Since Ministers originally approved the development despite acknowledged adverse effects on protected sites - basing the decision on overriding public interest and strict compensatory measures - any variation altering project delivery must be subjected to the highest scrutiny. The variation appears to offer no revised assessment of these required compensatory measures in light of the new phasing strategy. No compensatory measures from the original 2025 consent have been forthcoming.

Strengthened Case for a Public Local Inquiry: The original Section 36 consent was determined without a Public Local Inquiry. This is a highly controversial project of exceptional magnitude - and phasing represents a material change to the original assumptions, the complex scientific and environmental concerns must be properly examined through a transparent, fully scrutinised public inquiry. A project that was justified by the developers and ministers on the basis of its ‘claimed’

overall impacts and ‘claimed’ public benefits should not be permitted to alter those assumptions through a variation application.

Please also note my concerns that the public notice for this application was not widely publicised. It was almost impossible to find a link to it and a demonstrable lack of available information in locations likely to be highly affected. This is troubling to the public and should be equally troubling to ministers. It is yet another example of the developer's box ticking tactics.

I respectfully request that the Scottish Ministers refuse this variation application and require a full reassessment of the project as a whole.

Additionally, I have requested relevant information relating to objections under the Freedom of Information (Scotland) Act 2002.

Please confirm receipt of this objection, ensure it is filed ahead of the 18th June 2026 deadline, and confirm it will be actively considered during the determination process.

Yours faithfully,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 21:34
To: MD Marine Renewables
Subject: Berwick Bank

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear Ministers,

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe that the location of this massive windfarm next to two seabird colonies of vital importance to seabird conservation would be a huge detriment to seabird populations which are already endangered.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Yours sincerely,

[Redacted]

[Redacted]

Sent from Outlook for Android

[Redacted]

From: [Redacted]
Sent: 17 June 2026 22:45
To: MD Marine Renewables
Subject: Objection to variation application for Berwick Bank offshore windfarm

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear Sir/Madam,

I'm writing to you in order to raise my objections against the proposed Berwick Bank offshore windfarm and the plan to deliver the project in stages.

The developer's own impact assessment projects that this development could kill 261 Gannets, 2,808 Guillemots, 815 Kittiwakes, 66 Puffins, and 154 Razorbills in the first year alone, and tens of thousands more over its lifetime. This is against a backdrop of 70% of our seabird species being in decline.

Building Berwick Bank as planned would be a huge setback for Scotland's natural heritage. Its impacts are so severe, it could fast track species like Kittiwake to local extinction. Berwick Bank has the potential to be one of the deadliest windfarms for birds anywhere in the world.

I understand that consent for the project is conditional on these impacts being compensated for, but do not consider this to be either realistic or acceptable, especially since we are still waiting for SSE to publish a "seabird compensation Plan".

Further, I understand that SSE applied for a variation to allow them to deliver the project in stages. I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment; and would allow SSE to reduce the mitigations they would otherwise be required to put into place.

The project should continue to be assessed as a whole, not in separate stages.

This proposal has the potential to cause irreversible damage to wildlife, and undermine the good reputation of Scotland around the world.

This is a key issue for me and many in my community. I am seeking your clear commitment to protect Scotland's seabirds and wider marine ecosystem and ask that you do not grant the variation applicaiton.

Kind Regards

[Redacted
]

[Redacted]

From: [Redacted]
Sent: 17 June 2026 23:08
To: MD Marine Renewables
Subject: Objection to proposed phasing variation – Berwick Bank

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear Marine Directorate,

I writing to object to the proposed phasing variation for the Berwick Bank Wind Farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment. The project should continue to be assessed as a whole, not in separate stages.

I believe that:

- The scale of the development means that its environmental effects can only be properly understood when assessed in full rather than in separate phases.
- There remains significant uncertainty regarding impacts on internationally important seabird populations, including potential collision risks, displacement from feeding grounds, and cumulative effects alongside other offshore wind developments.
- The marine ecosystem, including marine mammals, fish populations, and sensitive habitats, could be adversely affected by construction and operational activities, and these impacts require comprehensive assessment before consent is granted.
- Local fishing communities and other marine users may face long-term consequences that have not been fully evaluated under a phased approach.
- Allowing phased development risks creating a precedent whereby major infrastructure projects can avoid the level of scrutiny that would normally accompany consideration of the project as a whole.

I would urge that the variation application is refused, or that a full reassessment is carried out before any decision is made.

Yours faithfully,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 18 June 2026 00:00
To: MD Marine Renewables
Subject: Application to Vary the Berwick Bank Windfarm Section 36 Consent and Marine Licences

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear Marine Directorate

I write to object to the proposed phasing variation for the Berwick Bank Wind Farm. Splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment. The project should therefore continue to be assessed as a whole, not in separate stages.

I would also contend that to date there has not been adequate public consultation concerning the implications of this project, the scale of which is so great that it has the potential to have a profound effect on the natural environment in its vicinity – during the construction phase, the operational phase and the decommissioning phase. This is an environment which we all have a moral duty to respect and a practical need to protect.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

With thanks for considering this representation,

Yours faithfully,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 18 June 2026 08:24
To: MD Marine Renewables
Subject: Berwick bank

Categories: Added to Tracker, Saved in eRDM
Objective: -1

I wish to raise serious concerns about the requested changes to the planning consent for this scheme and the proposals to change compensation which for this scheme is hugely important to mitigate the impact on beautiful birds such as puffins, guillemot, gannets etc.
The application is of great concern due to its predicted impacts on the sea bird colonies in the vicinity. Easy Lothian is an area of significant landscape and wildlife value which is irreplaceable. Protection should be foremost for these seabird colonies, compensation should be upheld in both contractual obligation and actual delivery.
I am resident in England but hold brilliant memories of East Lothian and love our brilliant UK birds. I am very concerned that this change could dilute any obligation to deliver on protections for birds.

[Redacted]

[Redacted]

From: [Redacted]
Sent: 18 June 2026 11:28
To: MD Marine Renewables
Subject: Berwick Bank

Categories: Added to Tracker, Saved in eRDM
Objective: -1

To whom it may concern

I object to the development by SSE of wind farms on Berwick Bank. Environmentally friendly energy should not be at the cost of thousands of birds lives

[Redacted]

[Redacted]

From: [Redacted]
Sent: 18 June 2026 17:27
To: MD Marine Renewables
Subject: Berwick Bank Wind Farm

Categories: Added to Tracker, Saved in eRDM
Objective: -1

I am writing to object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore,

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

I therefore request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

*It is my opinion that t*he Environmental Impact Assessment and data models are no longer valid. I think tha the Seabird Compensation Plan needs to be looked at in its entirety - not in phases. The cumulative impact is important (to prevent displacement). The project was consented as an integrated whole - not in phases.

Regards

[Redacted]

[Redacted]

From: [Redacted]
Sent: 18 June 2026 18:15
To: MD Marine Renewables
Subject: Objection to the Berwick Bank Windfarm

Categories: Added to Tracker, Saved in eRDM
Objective: -1

| [Redacted] strongly object to the proposed Berwick Bank Wind Farm for the following reasons.
1) Inadequate public consultation, 2) The reports and data models are no longer valid. 3) Seabird and marine ecology concerns, 4) visual impact and noise pollution, 5) Scotland already produce ten times the amount of energy to meet 2030 objectives. 6) Increase of restraint payments the public will be paying.
Please insure my objection is recorded.

[Redacted]

[Redacted]

From: [Redacted]
Sent: 18 June 2026 20:46
To: MD Marine Renewables
Subject: objection to variation in the Berwick Bank windfarm application

Categories: Added to Tracker, Saved in eRDM
Objective: -1

Dear Marine Directorate

Please register my objection to the proposed phasing variation for the Berwick Bank Wind Farm. If the project is split into phases then proper scrutiny of the full environmental and cumulative impacts will be reduced. This is particularly relevant for seabirds and the marine environment. The project should continue to be assessed as a whole, not in separate stages.

I also would like to state that to date there has not been adequate public consultation concerning the implications of this project on OUR LOCAL SEABIRD POPULATIONS. The scale of this windfarm is so great that it would have a profound effect on the natural environment – during the construction phase, the operational phase and the decommissioning phase. This is an environment which we all have a moral duty to respect in its own right, but also as an essential feeding ground for multiple populations of seabirds, and as a fishing ground for the local Forth fleets. We are in a climate emergency, but also a biodiversity and nature emergency which is just as important.

I respectfully request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Yours faithfully,

[Redacted]

[Redacted]

From: [Redacted]
Sent: 18 June 2026 23:37
To: MD Marine Renewables
Subject: Berwick Bank phasing plan

Categories: Added to Tracker, Saved in eRDM
Objective: -1

I wish to object to the proposed phasing variation for the Berwick Bank wind farm.
I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment. The project should continue to be assessed as a whole, not in separate stages.
Scotland is treasured for its natural environment and the seabirds along our coastline are very much part of our country's identity.
While I understand & support the need to transition & work towards net zero, it's imperative to strike a balance between such projects and nature; a "green" project that does not prioritise ecological concerns is counterintuitive. This location is so crucial to the migration, nesting and feeding grounds of seabirds already under pressure, that it is imperative that the affect on bird populations and the marine environment in general is kept to the forefront.
While estimates of the impact on bird populations have been made, it is surely more difficult to accurately predict how successful the measures in the compensatory plan might prove to be in the long-term. Besides the impact of the project itself, populations may also struggle with unpredictable variables such as disease and weather over time.
The proposed change would make it even more challenging to predict cumulative outcomes and ensure robust protections are followed through. It would dilute on paper the alarming numbers of endangered birds predicted to fall victim to strikes and displacement.
The Environmental Impact Assessment and reports and data models are no longer valid in this context.
I would therefore request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: FW: Berwick Bank objection
Date: 29 June 2026 16:50:22

From: [Redacted]
Sent: 15 June 2026 11:40
To: MD Marine Renewables <md.marinerenewables@gov.scot>
Subject: Berwick Bank objection

Good morning,

I am writing to you on 15/06/26 to express my objection to the proposed phased variation of the Berwick Bank wind farm.

By reducing the project into phases, I feel that this will negatively affect the required scrutiny to ensure that environmental impact toward the wildlife in the area is kept to a minimum. I believe that this project needs to be assessed as a whole entity, rather than in separate stages.

I am also greatly concerned about the impact on the area's wildlife. It has been projected by the RSPB that thousands of sea birds alone will die due to disruption to their habitat and damage to the environment. There are several other sites that would be just as viable for the wind farm without the serious environmental impact, we are seeking to harness wind energy *for* the good of the environment and sustainability - so why are we willing to risk the lives of thousands of birds and destroy natural habitats?

I request that the variation application is refused, or that a full reassessment and public inquiry is carried out prior to a decision being made.

My name is [Redacted] and you can contact me via this email address.

Kind regards
[Redacted]

Sent from Gmail mobile.

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank Objections
Date: 08 September 2026 22:16:23

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe the development at a site of global importance for seabirds required proper scrutiny.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Yours,

[Redacted]

Sent from my iPad

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank Wind farm Development
Date: 08 September 2026 21:09:16

Dear Sirs,

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe that seabirds and the marine ecology are of paramount importance and should be protected and nurtured.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made."

Yours faithfully,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank wind farm objection.
Date: 09 September 2026 05:33:42

Hello. I am writing to object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made. Look forward to hearing from you.

With hope, and best wishes.

[Redacted]

From: **[Redacted**
To: MD Marine Renewables
Subject: Berwick Bank Wind Farm
Date: 09 September 2026 09:43:43

Dear Controller,

"I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe that it would be possible to move this wind farm further off the shore. If you are counting the cost, why not add the lives of thousands of precious sea birds to the equation. Are human needs and economies so sacrosanct in this threatened world.

Please note that I support this development, but purely urge that monetary cost is not used as the sole measure of its viability.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made."

Sincerely

[Redacted]

Virus-free.www.avast.com

From: [Redacted]
To: MD Marine Renewables
Subject: Berwick Bank Wind Farm
Date: 08 September 2026 20:11:40

To the Marine Directorate,

I am writing to object to the the proposed phasing variation for the Berwick Bank Wind Farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Also, I am horrified to learn that up to 4000 seabirds, which are already in decline, are at risk in the first year alone. The proposed site for Berwick Bank is in internationally important seabird feeding grounds.

Whilst blade strike is a challenge, the biggest threat to the birds is from starvation. Energy is important to migratory birds - and having to navigate further for food - and from their chicks - means they often don't survive.

Independent experts, including: Royal Society for the Protection of Birds (RSPB) & Scottish Seabird Centre have raised serious concerns about seabird mortality (in particular Guillemots, Kittiwakes, Gannets, Razorbills, Puffins) (Scottish Seabird Centre) - as well as habitat disruption and long-term ecological impact.

In addition I understand that the entire ecosystem could be affected including fish, seals, dolphins and crustaceans which is simply not acceptable.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Thank you.

Yours sincerely

[Redacted]

From: **[Redacted]**
To: MD Marine Renewables
Subject: Berwick Bank
Date: 09 September 2026 09:17:52

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

From: [Redacted]

Sent: 10 June 2026 20:46

To: Central Correspondence Unit <scottish.ministers@gov.scot>

Subject: Objection to SSE Renewables' Application to Phase the Berwick Bank Offshore Wind Farm Consent

This amendment asks you to weaken the only condition that made the original consent defensible. I urge you to refuse it. The arguments below set out why - ecologically, economically, and ethically -this is the wrong decision.

Dear Scottish Ministers,

I write as a private individual and concerned citizen to register my strong objection to SSE Renewables' application to amend the planning consent for the Berwick Bank offshore wind farm by splitting the project into three separately compensated phases. I am not affiliated with any conservation organisation in submitting this response; this objection reflects my personal and professional concern for Scotland's natural environment and the long-term wellbeing of its people.

I would ask you to consider that the condition now under threat - that full compensation must be secured before construction begins - was one you imposed yourselves in granting the original consent in July 2025. That condition was not arbitrary. It was the minimum safeguard available to a regulator permitting a development forecast to cause harm of a scale unprecedented in Scottish offshore wind assessment. To approve this amendment would be to weaken a commitment your own administration made to Scotland's seabirds and to the public. I would urge you to hold that line.

I would ask you to consider the following grounds for refusal.

THE ECOLOGICAL CASE IS OVERWHELMING

Berwick Bank was already a deeply controversial consent, approved despite being situated in waters that support some of the most significant seabird colonies in the world. The Scottish Government's own scientific assessment forecast the destruction of thousands of birds annually (Guillemots, Gannets, Kittiwakes, Puffins and Razorbills) with the cumulative mortality over 35 years running into the tens of thousands of protected individuals. The original consent was conditional on full compensation being secured across the entire project before construction began. That condition existed for good reason: it was the minimum safeguard available to a regulator granting consent in the face of such extraordinary predicted harm.

The proposed amendment seeks to lower that bar. By allowing phase-by-phase compensation, SSE Renewables would be permitted to begin construction having secured mitigation for only a fraction of the total projected harm. This is not a technical adjustment; it is a fundamental weakening of the only meaningful protection that seabird populations currently have under this consent.

I urge you to reject it.

GENE POOL INTEGRITY AND POPULATION VIABILITY

Beyond the raw mortality figures, I am deeply concerned about the impact on genetic diversity and long-term population viability. Seabird populations in the North Sea are already under sustained pressure from climate-driven shifts in prey availability, avian influenza, and broader habitat degradation. Species like the Kittiwake are not merely declining in number — they are losing the demographic breadth and genetic variation needed to adapt to future change.

We must be clear-eyed about what phased compensation actually means in practice. It means accepting that one of Scotland's most iconic seabird aggregations will be substantially diminished before any meaningful restoration is required. A depleted population cannot simply be restored later. The gene pool cannot be rewound. The ecological principle that must govern decisions of this magnitude is that populations must be kept viable and diverse throughout - not destroyed and then asked to recover.

This is particularly urgent for colonial nesters like Gannets and Kittiwakes, where social behaviour, traditional nesting sites and cultural knowledge passed between generations are themselves part of what makes a colony function. You cannot kill thousands of birds and assume the survivors will simply rebuild as before.

THE ECONOMIC ARGUMENT AGAINST THIS DEVELOPMENT

Proponents of Berwick Bank frequently frame opposition to it as being anti-renewable energy. It is not. It is a recognition that this particular site represents a catastrophic cost-benefit failure, even on purely economic grounds.

Scotland's wildlife tourism sector generates hundreds of millions of pounds annually and employs thousands of people across coastal communities. Research commissioned by the Scottish Government found that marine wildlife tourism alone accounts for tens of millions of pounds of direct spend and over 600 full-time equivalent jobs. Crucially, that research identified seabirds as among the top five most important species cited by Scotland's wildlife tourists. Visitors come specifically for them. They charter boats to Bass Rock. They fill the Scottish Seabird Centre. They sustain the bed-and-breakfasts, the cafes, the local guides and the boat operators of the East Lothian coast.

This is an economy built directly on the existence of thriving seabird colonies. It is not abstract or speculative - it is functioning, proven, and growing. A consent that permits the systematic decimation of the colonies that underpin it is not economically neutral. It inflicts measurable, lasting harm on communities whose livelihoods depend on nature being there.

MENTAL HEALTH AND THE VALUE OF LIVING SEAS

I would also ask you to weigh something that rarely appears in planning assessments but is increasingly well-evidenced in the research literature: the profound mental health benefit that intact, abundant natural environments provide.

The Mental Health Foundation's research found that 70% of UK adults agree that being close to nature improves their mood, and 49% say it helps them cope with stress. Studies have linked bird abundance specifically - the kind of experience that a Gannet colony or a sea cliff full of Razorbills offers - with reduced levels of depression, anxiety and stress in surrounding communities. These are not marginal effects. In an era of escalating mental health demand on public services, the value of accessible, high-quality natural spaces is substantial and should be counted.

The seabird colonies of the Firth of Forth are not just ecological assets. They are part of the fabric of life for people who live near them, walk the coastal paths beneath them, and draw meaning and restoration from their presence. Decisions that diminish those colonies diminish something that cannot easily be replaced or compensated - certainly not by the mechanisms currently proposed.

THE RIGHTS OF NATURE

Finally, I would invite you to consider an emerging but increasingly mainstream framework in environmental law and ethics: the question of whether natural systems and the species that depend on them hold intrinsic rights — not merely instrumental value to humans, but rights of their own.

This is not a fringe position. Robert Macfarlane's 2025 book Is a River Alive? brought this question into wide public discourse, exploring the Rights of Nature movement in which rivers, forests and ecosystems have been granted legal

personhood in jurisdictions including New Zealand, Ecuador and Colombia. Drawing on the work of Indigenous botanist and ecologist Robin Wall Kimmerer - whose concept of a 'grammar of animacy' asks us to recognise natural entities as subjects rather than objects - Macfarlane argues that the language and law we use to describe the natural world shapes how we treat it.

We currently have no legal framework in Scotland that recognises the seabird colonies of the Firth of Forth as entities with their own claim on existence. But I would argue that any planning system operating in good faith must at least ask the question: does this development serve the interests of the living world as well as the interests of shareholders? In the case of Berwick Bank, the answer is plainly no.

A development that cannot be made safe for wildlife should not be made at all. Not at this site, not at this scale, and not by hollowing out the one compensatory condition that gave the original consent any moral foundation.

I respectfully request that this application be refused, and that you use the full weight of your office to revisit the viability of Berwick Bank as a whole in light of the ongoing inability to identify credible, proportionate compensation for its projected impact.

Thank you for considering this submission.

Yours sincerely,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: I object to the proposed phasing variation for the Berwick Bank wind farm.
Date: 09 September 2026 09:55:46

Dear Sir or Madam

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

I believe that the damage that will be caused to birds, and marine life, outweighs the benefits of renewable enery in this particular case.

I also believe that:

The Environmental Impact Assessment is no longer valid

The reports and data models are no longer valid

The Seabird Compensation Plan needs to be looked at in its entirety - not in phases. The cumulative impact is important (to prevent displacement).

The project was consented as an integrated whole - not in phases

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Yours sincerely

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Objection to Berwick Bank Variation Request
Date: 09 September 2026 10:04:21

Dear Marine Directorate,

I am writing to register my objection to SSE Renewables' request to vary the Berwick Bank consent. Although the formal consultation window has closed, the decision remains pending, and I wish my concerns to be considered before Ministers reach a determination.

The proposed phasing of the project would materially weaken the original consent conditions, which required full seabird compensation for the entire development. The Habitats Regulations are clear: where Adverse Effects on Site Integrity are identified, compensation must be secured, deliverable, and ecologically equivalent before a project proceeds. Splitting Berwick Bank into phases risks allowing construction to begin without legally adequate compensation in place.

The predicted mortality—tens of thousands of seabirds across multiple SPA features—cannot be offset by the measures currently known to be feasible. Allowing phasing would create a situation where later compensation becomes practically undeliverable, leaving Ministers exposed to legal challenge and Scotland's protected seabird populations exposed to irreversible harm.

I urge the Directorate to recommend refusal of the variation request and to uphold the original consent conditions in full.

Kind regards,

[Redacted]

From: [Redacted]
To: MD Marine Renewables
Subject: Objection to Berwick Bank Wind Farm
Date: 08 September 2026 18:15:33

I object to the proposed phasing variation for the Berwick Bank wind farm.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages. It was only consented as an integrated whole.

I strongly believe that we need to build more offshore wind farms but the location of this one is utterly irresponsible.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

Regards

[Redacted]

From: [Redacted
To: MD Marine Renewables
Subject: Objection to the Berwick Bank Windfrarm
Date: 09 September 2026 09:30:13

I am objecting to the wind farm after reading the Guardian newspaper article dated 8 September. There is a biodiversity crisis and although I a fully in favour of wind farms Berwick Bank is in the wrong place and will more harm than good. MY objections are listed below,

The Environmental Impact Assessment is no longer valid

The reports and data models are no longer valid

The Seabird Compensation Plan needs to be looked at in its entirety - not in phases. The cumulative impact is important (to prevent displacement).

The project was consented as an integrated whole - not in phases

Conditions were imposed holistically - so needs to be readdressed

Cumulative impacts may no longer be properly controlled.

Seabird and marine ecology concerns

Weakening of original safeguards

Inadequate public consultation

[Redacted]

Sent from my iPad

From: **[Redacted]**
To: MD Marine Renewables
Subject: Objection to wind farm
Date: 08 September 2026 18:11:27

I object to the proposed phasing variation for the Berwick Bank wind farm, which has the clear objective of dodging the rules.

I am concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe that our seat birds are precious, they have only just recovered from avian flu, and it is not necessary to kill them in large numbers to reach the objective tivesd of the wind farm.

I request that the variation application is refused, or that a full reassessment/public inquiry is carried out before any decision is made.

[Redacted]

From: [Re
To: MD Marine Renewables
Subject: Stop Berwick Bank Windfarm
Date: 08 September 2026 20:07:26

I am a firm supporter of windfarms but I writing to you as a member of the RSPB because I strongly object to the proposed phasing variation for the Berwick Bank wind farm. I understand that the case the project was consented as an integrated whole, not in phases, and am therefore concerned that splitting the project into phases reduces proper scrutiny of the full environmental and cumulative impacts, particularly for seabirds and the marine environment.

The project should continue to be assessed as a whole, not in separate stages.

Furthermore, I believe there has been inadequate public consultation on this matter. Most people want to protect marine ecology and seabirds and there is a danger that thousands of birds will be killed. I also think a new Environmental Impact Assessment should be carried out now that the original one is no longer valid.

For the above reasons I request that the variation application is refused, or that a full public inquiry is carried out before any decision is made.

[Redacted]

From: [Redacte
To: MD Marine Renewables
Subject: Wind farms and Seabirds
Date: 08 September 2026 21:22:48

I object to the sighting of your proposed new Berwick Bank windfarm too close to the Bass Rock.
I support the development of windfarms and urgently want to see more of them, but they need to be carefully sighted to reduce their impact.
All forms of power generation have their impacts and their costs, but the impact of this one on the local seabird population is too great. Move it further out to sea.

Yours,
[Redacted]

Sent from Proton Mail for Android.