Appendix I
Consultation Responses

Historic Environment
Scotland

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300044396
Your ref: SCR-0125
30 March 2026

By email to:
MD.MarineRenewables@gov.scot
Marine Directorate (Marine Renewables)
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Dear Marine Directorate

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007
Berwick Bank Wind Farm – Section 36 consent variation – Monopile and Additional Export Cable Variation
Request for Screening Opinion

Thank you for consulting us on this Environmental Impact Assessment (EIA) screening request, which we received on 25 March 2026. This letter contains our comments for our historic environment interests, which cover cultural World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas.

The relevant local authority archaeological and conservation advisors will also be able to offer advice on historic environment impacts. This may include topics covered by our advice-giving role, and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

We understand that you are looking for advice on whether the proposed variation to the consented Berwick Bank Offshore Wind farm qualifies as an EIA project as defined in the EIA Regulations.

Our advice

We have not identified any potentially significant effects on the historic environment for our interests, and we therefore have no reason to consider the proposals to be EIA development.

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox,

hmconsultations@hes.scot. If you have questions about this response, please contact Mary MacLeod Rivett at [Redacted]

Yours sincerely

Historic Environment Scotland

NatureScot

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

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

22 April 2026

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

Dear [Redac

BERWICK BANK WIND FARM LIMITED – SECTION 36 CONSENT VARIATION – CONSULTATION ON REQUEST FOR SCREENING OPINION

Thank you for your consultation on the 25th of March for a Screening Opinion Request in relation to the proposed Section 36 Variation for the Berwick Bank Wind Farm Limited (BBWFL). We have reviewed BBWFLs Environmental Impact Assessment (EIA) Screening Report (Document Number: BK-SSE-000-CON-REP-027) and provide the following advice.

Variation Proposal

Additional site characterisation, undertaken since the application for consent, have informed the refinement of some of the original project design parameters, site layout and the proposed approach to delivery of the project. Two principal changes to the consents and licences have been identified by BBWFL during design refinements, and this Screening Opinion Request is to support these two principal changes. The purpose of the variations is to:

- Include provision for the **installation of monopile foundations** at a number of locations, as an alternative to pin-piled or suction caisson jacket foundations as assessed in the Environmental Impact Assessment Report (EIAR) and currently consented (the 'Monopile Variation').
- Provide an Additional Export Cable Corridor ('**Additional ECC'**) (for the connections to Branxton) to rationalise export cable lengths and reduce inter-array cable crossings based on refined WTG layouts and ground condition data (the 'Additional ECC Variation).

This Screening Opinion Request is to determine whether the inclusion of the provision for monopiles constitutes significant enough changes to the original project design envelope (PDE) to require a new or updated Environmental Impact Assessment (EIA). BBWFL do not consider the changes proposed to be sufficient to require further EIA. This is based on BBWFL's conclusion that the inclusion of monopile foundations does not change the significance of effect for the project alone or cumulatively for marine mammal or fish and shellfish receptors, from the original S36 conclusions.

We note within the requirement of this variation the addition of a new ECC, and the reasoning provided in Section 3.1.2 by BBWFL which notes that this additional ECC does not fall within the description of an EIA, either in isolation or when considered as a change to an existing project. We request that MD-LOT confirm whether an EIA is required or not, as in our view, this ECC variation is primarily linked to the Section 36 application for the generation of the offshore wind farm array. Either way, if considered EIA or non-EIA, we agree that there is a need for environmental assessment to accompany the assessment and provide advice for the ECC below.

NatureScot Advice

Having reviewed the Screening Report, we consider the proposed changes in this variation to be material, under the Electricity Works (Environmental Impact Assessment) Regulations, and as such consider the variation to require an EIA. We do not agree with the conclusion provided by BBWFL in Section 2.8 of the EIA Screening Report that an EIA is not required for the Monopile Variation. **We consider an EIA Report is necessary to support the S36 and Marine Licence variation application, and detail below how this should be <u>focused</u> on marine mammals and fish and shellfish receptors only.** Please see our detailed advice below.

Considering our advice, if it would be helpful to discuss assessment methods for use in a focused EIA, we are willing to discuss this in a meeting, or through additional advice.

A.1 Monopiles

A.1.1 Marine Mammals

Overall, the report is clearly presented, and the updated modelling methods are generally in line with current guidance, including the adoption of NMFS (2024)[1] thresholds, use of accepted does-response functions, and the shift to propagation-based source modelling.

A.1.1.1 *Substantial increases in predicted impact ranges*

Substantial increases in predicted impact ranges are shown across all marine mammal receptors, but particularly for harbour porpoise, and minke whale. The assessment shows that for harbour porpoise (Very High Frequency (VHF)), large instantaneous permanent threshold shift (PTS) ranges persist even under NMFS (2024) criteria, with maximum ranges >2km and up to 13 individuals predicted to be affected per monopile. For minke whale (Low Frequency (LF)), cumulative PTS ranges increase dramatically compared to the original EIAR, from ~1km (the original jacket scenario) to 15km without mitigation. With mitigation, this range is still >13km with the inclusion of 15-minutes of Acoustic Deterrent Device (ADD) activation. These increases represent a fundamental

[1] <u>NMFS (2024)</u>

change in scale and nature of the predicted impacts, and as such we consider an EIA is required for marine mammals.

The results from the report demonstrate a material increase in predicted environmental impacts compared to the original EIA Report. We consider these changes to be significant, and sufficient to potentially alter the original conclusions within the EIA Report**.** Therefore, we consider a new, focused EIA is required to properly assess the environmental implications of the proposed variations on marine mammals.

A.1.1.2 *Uncertainty around mitigation*

For LF cumulative PTS effects, the conclusion that significance can be reduced (section 5.1.1.2) relies heavily on extending ADD activation up to 30 minutes. However, we highlight the following:

- This mitigation duration is not yet an established practice and would require formal agreement;
- In the event that increased ADD duration is possible, impact distances remain very large; and
- Evidence that increased ADD duration alone could adequately address LF cumulative exposure is not compelling when consideration the magnitude of predicted ranges.

This creates uncertainty around whether meaningful mitigation can be secured or implemented in practice.

A.1.1.3 *Noise Abatement Systems (NAS)*

The modelling demonstrates that employing NAS produces substantial reductions in injury ranges, including:

- A reduction of one-third to two-thirds (depending on receptor)
- The predicted number of individuals affected falling to fewer than one, for most species' groups.
- For minke whale, numbers drop from 28 unmitigated to 1-3 using NAS+ADDs.

Despite the strong evidence that NAS would materially reduce impacts to marine mammals, NAS is not proposed as a mandatory mitigation measure. The decision to not adopt the most effective demonstrated mitigation contributes towards the need for a new assessment of impacts and reasonable alternatives under EIA requirements.

A.1.1.4 *Cumulative Effects*

The current cumulative assessment now includes additional projects, resulting in adverse effects not previously identified. The conclusion that the project variation does not alter the original EIA Report finding relies on the assumption that extended ADD operation resolves the increased LF PTS ranges. However, this assumption is uncertain. It is not supported by clear evidence that the impacts can be reduced to levels previously assessed, and the magnitude of cumulative impact ranges (up to 15km) represents a material change from the original assessment. This has the potential to shift the overall significance profile, and as such reconsideration through a new EIA should be undertaken.

For the reasons outlined above, we consider the proposed variation to result in environmental impacts to marine mammals that are materially different from those assessed in the original EIA

Report. As such, we disagree that these changes are characterised as minor, or non-substantial, and **a new EIA focusing on marine mammals, is required to fully and properly assess the updated impact profile, mitigation options and significance of effects.**

Marine Directorate should advice on a final approved list of projects to be considered cumulatively.

A.1.2 Fish and Shellfish

Section 2.7.4 of the Screening Report summarises the assessment for impacts on fish and shellfish resulting from the proposed monopile variation. Overall, BBWFL conclude the impacts from the Monopile Variation to be consistent with those outlined in the original EIA Report, and as stated in Section 2.8 of the Screening Report, do not consider an EIA required for the Monopile Variation.

We consider the results from Appendix B to demonstrate a material increase in predicted environmental impacts compared to the original EIA Report. We consider these changes to be significant, and sufficient to potentially alter the original conclusions within the EIA Report. **Therefore, we consider a focused EIA is required to properly assess the environmental implications of the proposed variations on fish and shellfish.**

A.1.2.1 *Mortality and Recoverable Injury*

Table 5.18 within Appendix B highlights that the unmitigated monopile realistic energy impact range for all fish receptor groups has increased notably from the max energy (jacket foundation) modelling from the original EIA Report. When comparing the unmitigated monopile max energy to the max energy taken from the original EIA Report, anticipated impacts are, at least approximately 7x greater, again representing a significant deviation from the original assessment results.

Table 5.19 shows a substantial increase in the impact mortality area for Group 2, 3 and 4 fish for the unmitigated single monopile modelling, compared to the original EIA Report jacket foundation scenario. Whilst the report concludes that the new mortality ranges are small, they represent a significant increase from the original impact ranges (33m increasing to 392m for Group 3 and 4 species). Similarly, the increase in impact area for recoverable injury is notable for Groups 2, 3 and 4, with the largest increase again being for Group 3 and 4 fish (6m increasing to 1563m).

With the implementation of NAS mitigation, impact ranges notably reduce for all fish hearing groups (Table 5.21). However, we note that the modelled impact ranges with NAS are still higher for both mortality and recoverable injury than impact ranges modelled in the EIA Report. Whilst the Application of NAS greatly reduces the impact ranges significantly from the unmitigated monopiling scenario, impact ranges are still higher than what was originally assessed.

A.1.2.2 *Behavioural Disturbance*

Section 5.2.2 of Appendix B shows the modelled behavioural range for unmitigated single monopiles to be significantly higher than those modelled in the original EIA Report (23,731m compared to 4161m, Table 5.22). The inclusion of NAS reduces this impact range from 23,731m to 11,817m (Table 5.23) which we agree is a significant reduction in impact; however, we still consider this reduced, mitigated range to be significantly larger than what was presented in the original EIAR.

A.1.2.3 *Magnitude*

We do not agree that the proposed variation results in an 'unchanged' magnitude for either the unmitigated monopile scenario or modelling with the application of NAS. Additionally, the use of NAS as mitigation during piling is not proposed as a mandatory mitigation measure, and therefore we cannot base any conclusions on the mitigation offered until there is a commitment for this to be used by BBWFL.

A.1.2.4 *Cumulative Effects*

The original EIA Report CEA concluded a negligible to minor (not significant) cumulative impact significance for marine and diadromous fish and shellfish. Section 6.3.2 of Appendix B details how for the unmitigated monopile scenario, the mortality, recoverable injury and TTS ranges are predicted to approximately triple (within a 24km range), when compared to the original EIA Report. When mitigated using NAS, ranges for monopiles are predicted to approximately double compared to the original EIA Report. BBWFL conclude that neither scenario (monopiling and mitigated with NAS) represent a significant increase in underwater sound, and do not contribute towards an increased cumulative effect. We do not consider the doubling of impacts to be insignificant, and without confirmation that NAS will be utilised during construction as a mitigation method, we cannot be confident in the conclusions of the CEA for fish and shellfish.

As above, Marine Directorate should advice on a final approved list of projects to be considered cumulatively.

A.1.2.5 *Designated Sites*

The Monopile Variation is anticipated to increase the predicted area of underwater noise, with impacts reaching closer to designated sites. Despite this, BBWFL have concluded no AEoSI for any fish or shellfish receptors for any Special Area of Conservation (SAC), due to the distance of the Array Area (AA) from SAC's being sufficient to not result in a barrier to species movement. This conclusion has been reached for both the unmitigated single monopile scenario, and the NAS mitigated installation scenario. We note from Figure 7.12 of Appendix B that the application of NAS significantly reduces the TTS impact range for fish receptors but note again that there is no commitment to use NAS within the Screening Report.

The Monopile Variation represent an increase in impacts to fish and shellfish receptors, and as such we advise that fish and shellfish are screened in and considered further within an updated EIAR alongside Marine Mammals.

A.1.3 Inter-Related Effects

Inter-related effects of the development were considered in the original EIA Report and concluded that the loss of prey resources (fish and shellfish) for marine mammals was of 'imperceptible significance'. The Screening Report similarly concludes that the inter-related effects as a result of the Monopile Variation are equally, inconsequential. However, noting our advice above for both marine mammals and fish and shellfish, it would be beneficial to further consider how potential impacts to prey species may influence marine mammals as a result of the changes proposed as part of the Monopile Variation.

A.2 Export Cable Corridor

As above, we request that Marine Directorate confirm whether or not the Additional ECC constitutes a change to a Schedule 1 or 2 development under The EW EIA Regulations.

In this response, we have responded to BBWFLS requests for clarification around the need for further environmental assessment on specific receptors.

A.2.1 Marine Mammals

BBWFLs Marine Mammal assessment includes a new SCANS IV assessment. This assessment shows that densities of cetaceans are not significantly different from those presented in the original EIA Report. As the additional ECC does not result in changes to the established baseline conditions or increase infrastructure relative to the EIA Report Project Design Envelope (PDE), BBWFL conclude that the conclusions of the original EIA Report remain applicable for cetaceans. However, BBWFL detail that the new SCANS IV data has identified a difference in seal densities, from what was presented in the EIA Report, and as such, there is a potential change to the baseline for seals. To clarify, SCANS IV only shows the distribution and abundance of cetaceans in European Atlantic Waters and does not provide information on pinnipeds. NatureScot recommend Carter *et al* (2025)[2] to assess seal abundance and densities.

As only a difference in seal densities has been identified in the revised assessment, BBWFL propose to undertake a detailed review of the latest SCANS IV for seals in the SEIR, based on the potential change to the baseline. Table 3-8 of the Screening Report shows the potential impacts requiring further assessment within the SEIR, and additional assessments are proposed only for seals, based on the difference in densities from the original EIA Report and the new SCANS IV data. If a seal re-assessment is included within the SEIR on the basis of a change to the baseline from the initial EIA Report, we advise that the same assessments should be carried out and included within the SEIR for cetaceans, highlighting that Carter *et al* (2025) should be used for seals.

A.2.2 Fish and Shellfish Ecology

Table 3-7 outlines the potential impacts which BBWFL propose to assess further in the SEIR. We agree that Temporary subtidal habitat loss; Increase in SSC and associated sediment deposition and Long-term subtidal habitat loss should be further assessed and agree that injury and disturbance to fish and shellfish from underwater noise and vibration can be screened out.

Overall, we are content with the proposed impacts to be screened into the SEIR shown in Table 3-7, however, we advise that further environmental assessment for Electro Magnetic Frequency (EMFs) should be screened in and included within the SEIR.

A.2.3 Benthic and Subtidal and Intertidal Ecology

The additional ECC occupies a different geographical area of seabed to what was assessed in EIA Report, with the new proposed ECC traversing the Scalp and Wee Bankie MPA (part of the Firth of Forth Banks Complex Nature Conservation Marine Protected Area (NCMPA). JNCC maintains responsibility for offshore MPAs. As such, we defer to and include JNCC's advice below. This advice relates only to the additional ECC.

[2] At Sea Distribution of seals on the Northwest European Shelf: Towards transboundary conservation and management

We note that the two dominant biotypes identified from underwater videos across the additional ECC are Priority Marine Features (PMF) within Scotland, with Offshore circalittoral coarse sediment (SS.SCS.OCS) and Circalittoral fine sand (SS.SSa.CFiSa) falling under the PMF Offshore Subtidal Sands and Gravels which should be considered in the SEIR.

A.2.3.1 *Firth of Forth Banks Complex NCMPA*

The Additional ECC covers an area of 36.7km^2, of which approximately 20.5km^2 overlaps with the Firth of Forth Banks Complex NCMPA. This site is designated for the protection of ocean quahog aggregations, offshore subtidal sands and gravels, shelf banks and mounds large-scale feature, and Wee Bankie key geodiversity area. The Conservation Objectives for this site are that the protected features:

- So far as already in favourable condition, remain in such condition; and
- So far as not already in favourable condition, be brought into such condition, and remain in such condition.

To clarify, the condition and General Management Approach (GMA) for the features within the Firth of Forth Banks Complex NCMPA is as follows:

- Ocean quahog aggregations: The feature is in **unfavourable** condition. The GMA is to recover the feature to favourable condition.
- Offshore subtidal sands and gravels: The feature is in **unfavourable** condition. The GMA is to recover the feature to favourable condition.
- Shelf banks and mounds large-scale feature: The feature is in favourable condition. The GMA is to maintain the feature at favourable condition.
- Wee Bankie Key Geodiversity Area: The feature is in favourable condition. The GMA is to maintain the feature at favourable condition.

JNCC strongly advise that the Applicant follow the mitigation hierarchy and avoid routing the Additional ECC through the designated site. Routing the cable through the designated site may move the site further away from achieving its conservation objectives and hinder features from achieving favourable condition. Please refer to JNCC's Site Information Centre for Firth of Forth Banks Complex NCMPA located at https://jncc.gov.uk/our-work/firth-of-forth-banks-complex-mpa and JNCC's MPA Mapper for additional information on associated protected features data (located at: https://jncc.gov.uk/mpa-mapper).

A.2.3.2 *Section 3.6.3.2, page 43*

"**BBWFL would welcome MD-LOT and consultees' views on the position set out above and agreement that an MPA Assessment is necessary to consider whether the Additional ECC has the potential to affect the protected features of the FFBC MPA and whether there is a risk of hindering the achievement of the conservation objectives as a result of the inclusion of the Additional ECC.**"

JNCC are in agreement that further environmental assessment is necessary, including an MPA Assessment, in relation to the potential impacts on the Firth of Forth Banks Complex NCMPA in order to determine if the proposed Additional ECC will likely affect (other than insignificantly) the protected features of the MPA. We also agree that as there is no change to the EIA Report PDE, the

same potential impacts assessed within the MPA Assessment in relation to offshore export cables should be considered in relation to the Additional ECC.

JNCC request that additional information be provided in the variation and Supporting Environmental Information Report about whether the Additional ECC would reduce overall impacts to the Firth of Forth Banks Complex NCMPA. If the Additional ECC variation would result in an overall greater impact to the NCMPA (compared to what has already been consented within the NCMPA) then JNCC advise that our preference would be for the Berwick Bank Wind Farm to proceed as currently consented in order to minimise impacts to the designated site which is already in unfavourable condition.

A.2.3.3 *'Appendix C - Additional ECC Benthic Survey Report' (Section 5.7, page 26)*

Ocean quahog (*Arctica islandica*) is a declining species in the North Sea region and there is uncertainty in its ability to recover. We would like to highlight that this species is a designated feature of the Firth of Forth Banks Complex NCMPA, and that protection is afforded to *A. islandica* at all life stages, including juveniles. We consider that there is currently no single method that effectively surveys or monitors the population status of *A. islandica in situ*. We therefore would suggest that developers do not undertake any systematic survey for *A. islandica* unless agreed with the regulator or consultees. It is noted that *A. islandica* was identified at five grab sampling locations with 'probable' identification from siphons. We would therefore consider this feature to be present.

A.2.4 Physical Processes

As stated above, the additional ECC will increase the projects overlap with the FFBC MPA. Therefore, we agree that further assessment is required to consider whether potential impacts will result in a likely significant effect, as well as an updated MPA assessment.

We are content with the proposed further environmental assessments outlined in Table 3-5.

A.2.5 Offshore and Intertidal Ornithology

Whilst we agree that the additional ECC is located entirely within the original study area, we do not agree that the assessment from the EIA Report remains entirely valid or applicable to the additional ECC. This is due to the increased overlap with the Outer Firth of Forth & St Andrews Bay Complex (OFFSAB) SPA (as demonstrated by Figure 3-7) compared to the assessed overlap with the OFFSAB when the Branxton ECC was assessed. BBWFL propose to use additional DAS data from March 2024 onwards to update the baseline, however we do not consider the 2024/2025 DAS data alone to be sufficient to reassess the baseline. Our preference would be to have two full years of DAS data, but in the event that this is not possible, we can accept the 2024/25 dataset. Noting the reliance on a single year, it will be necessary to contextualise this by presenting the reassessment alongside the 2019-original DAS survey, to account for recent external factors such as HPAI and marine heatwaves.

Overall, we are content with the potential impacts with required further assessment proposed further assessment.

A.2.6 MPA Assessment

The proposed additional ECC passes through the Firth of Forth Banks Complex Nature Conservation Marine Protected Area NCMPA. The Firth of Forth Banks MPA is an offshore MPA, and therefore JNCC have been consulted on the proposed variation.

Please see JNCC's advice above in Section A.2.3.2.

A.2.7 HRA Screening

We agree with the position set out by BBWFL and consider HRA screening necessary to consider whether the Additional ECC has the potential to affect the qualifying features of European and Ramsar sites, and whether there is a risk of hindering the achievement of the conservation objectives as a result of the inclusion of the Additional ECC. We agree that it is appropriate for the same potential impacts to be assessed in the reassessment as the Report to Inform the Appropriate Assessment (RIAA).

A.2.8 Inter-Related Effects

We note from Section 3.6.11 that Inter-Related Effects will be updated and considered in the SEIR, only if likely significant effects arising specifically from the inclusion of the Additional SEIR are identified. We are content with this approach.

A.2.9 Blue Carbon

We advise that a blue carbon assessment should be carried out and presented in the SEIR. The Additional ECC passes through the FFBC MPA and increases the overall footprint within the MPA compared to the original assessment in the EIA.

We hope this advice is helpful. 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

SEPA

From:	Planning South
To:	MD Marine Renewables
Subject:	FW: PCS-20008405 SEPA Response to SCR-0125
Date:	11 May 2026 16:18:56
Attachments:	image001.png image002.png image003.png image005.png image006.png image008.png image004.png

OFFICIAL

OFFICIAL

OFFICIAL

From: **[Redacted]**
Sent: 11 May 2026 15:04
To: Planning South <Planning.South@sepa.org.uk>
Subject: FW: PCS-20008405 SEPA Response to SCR-0125

Dear **[Redacted]**

Further to the email below, this has been escalated to me. I can advise that as we have no site-specific advice to provide relative this development, we would not require an EIA.

Kind Regards,

[Redacted]

[Redacted]

Planning & Contaminated Land Manager
Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

01698 581013
[Redacted]
Carrochan, Carrochan Road, Balloch G83 8EG
Postal address: Angus Smith Building | Unit 6, 4 Parklands Avenue | Holytown | Motherwell | ML1 4WQ

I work Monday - Friday

To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Subject: PCS-20008405 SEPA Response to SCR-0125

To Whom It May Concern,

Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
SCR-0125
Berwick Bank Wind Farm Limited – Section 36 consent variation – Monopile and Additional Export Cable Variation – Consultation on Request for Screening Opinion
Berwick Bank Wind Farm

Thank you for the above consultation. Based on the information provided, it appears that this application falls below the thresholds for which SEPA provide site specific advice. Please refer to our standing advice and other guidance which is available on our website.

In addition, please also refer to our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations available here.

If there is a significant site-specific issue, not addressed by our guidance or other information provided on our website, with which you would want our advice, then please reconsult us highlighting the issue in question and we will try our best to assist.

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

Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

For the future of our environment

Northumberland County Council

From:	**[Redacte**
To:	MD Marine Renewables
Cc:	**[Redacted]**
Subject:	re: SCR-0125– Berwick Bank Wind Farm Limited – Section 36 consent variation – Monopile and Additional Export Cable Variation – Consultation on Request for Screening Opinion – Response Required by 22 April 2026
Date:	24 April 2026 15:41:09

Please note that as an English Local Authority (Northumberland County Council), the legislation and regulations we operate under and enforce are constrained to the extent of our administrative boundary, including any areas within the North Sea above the Mean Low Water Mark.

EIA screening is the first step in a process of determining whether a proposed project falls within the remit of relevant planning legislation (such as The Town and Country Planning (Environmental Impact Assessment) Regulations) and whether it is likely to have a significant effect on the environment and therefore requires an assessment.

Therefore, our consideration of any screening opinion for any Environmental Impact Assessment would be constrained to those impacting the locality around the place where the cabling is to come onshore and the infrastructure associated with the connection of the electricity into the National Grid.

The submitted documentation is unclear as to how the connection will be made into the National Grid and the precise location, however given that there is a major National Grid substation and that there have been a recent planning application for interconnections at Cambois, Blyth - it is assumed this will be the point that the windfarm cabling will come onshore.

The Environmental Protection Team at Northumberland County Council are consultees to the Local Planning Authority and provide consultation responses to a wide range of planning applications in Northumberland, including the following which may be relevant to this screening application:

- "Onshore export cables, converter station and associated grid connection for Berwick Bank Offshore Wind Farm" at Land North Of Blyth & East Sleekburn South East Of Cambois Northumberland (permitted under 23/04110/OUT)

This application was previously determined as requiring an Environmental Statement under an EIA screening application (22/04118/SCOPE).

If this development is the point of connection or conversion onto the National Grid, then it is expected that all aspects of that development has captured any environmental impacts and were considered by this consultee at the Northumberland |County Council Local Planning Authority application stage.

If some other form of connection is required at Cambois, Blyth which requires our consultation by the Local Planning Authority then we will consider impacts at that stage.

However, as presented in the documentation supplied, we can see no significant impact upon Northumberland at the location where the cabling would come onshore or any significant impacts to already permitted electricity infrastructure which would warrant a local consideration of an EIA unless some other form of connection were to be made to the National Grid not accounted for here.

Regards

[Redacted]

Northumberland County Council

[Redacted]

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

[Redacted]

Web: www.northumberland.gov.uk

Public Protection Privacy Notice

Angus Council

From:	**[Redacted**
To:	MD Marine Renewables
Subject:	SCR-0125– Berwick Bank Wind Farm Limited – Section 36 consent variation – Monopile and Additional Export Cable Variation – Consultation on Request for Screening Opinion – Response Required by 22 April 2026
Date:	09 April 2026 09:07:25

Dear Sir/Madam,

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ("the EW Regulations")
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ("the MW 2017 Regulations")
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 ("the MW 2007 Regulations")
COLLECTIVELY, "the EIA Regulations"
CONSULTATION UNDER PART 2, REGULATION 8(5) OF THE EW REGULATIONS REGULATION 10(5) OF THE MW 2017 REGULATIONS AND SCHEDULE 2, REGULATION 4 OF THE MW 2007 REGULATIONS
SCR-0125– Berwick Bank Wind Farm – Section 36 consent variation – Monopile and Additional Export Cable Variation

I write in response to the above consultation.

The Screening Opinion request relates to a request for changes to the consents in respect of the following elements: -

- Include provision for the installation of monopile foundations at a number of locations, as an alternative to pin-piled or suction caisson jacket foundations as assessed in the Environmental Impact Assessment Report (EIAR) and currently consented (the 'Monopile Variation'); and
- Provide an Additional Export Cable Corridor ('Additional ECC') (for the connections to Branxton) to rationalise export cable lengths and reduce inter-array cable crossings based on refined WTG layouts and ground condition data (the 'Additional ECC Variation).

Angus Council would agree with the conclusions contained in the Screening Report: Section 36 Consent and Marine Licence Variations by SSE Renewables that the Monopile Variation does not constitute 'EIA development' and the additional ECC Variation does not fall within the descriptions of development in Schedule 1 or Schedule 2 of the MWS EIA Regulations or Schedule A1 or Schedule A2 of the MW EIA Regulations and therefore the regulations do not apply. However, it is the decision of your organisation to determine if a full EIA is required.

Regards,

[Redacted]

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

Fife Council

From: [Redacted]
To: MD Marine Renewables
Subject: SCR-0125 Berwick Bank Wind Farm
Date: 03 April 2026 11:53:17
Attachments: Outlook-mvf241kk.png

Good morning,

Fife Council as Planning Authority has no comments to make on this variation.

Thanks,

[Redacted]

[Redacted]

Major Business & Customer Service - Priority Applications Team
Planning, Climate and Sustainability Service
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For more information, please see our website fife.gov.uk/planning