

# **Angus Council**

**From:** [Ruari Kelly](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** Seagreen Wind Energy Limited – Screening of proposed section 36 and marine licence variation proposal – Seagreen Alpha and Bravo Offshore Wind Farms, Firth of Forth - Response required by 03 March 2022  
**Date:** 15 March 2022 09:46:45

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Dear Sir/Madam,

I refer to the above consultation and having reviewed the submitted information in so far as potential impacts on Angus, Angus Council is satisfied that the S36 variation proposal would not result in impacts of significance that are new or materially different to those of the consented Seagreen Project.

Angus Council would be minded to accept the conclusions presented in the screening report.


Kind regards,

Ruari

Ruari Kelly | Planning Officer (Development Standards) | Angus Council |  | [kellyr@angus.gov.uk](mailto:kellyr@angus.gov.uk) | [www.angus.gov.uk](http://www.angus.gov.uk)

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# **East Lothian Council**

**From:** [Squires, Jean](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** RE: Seagreen Wind Energy Limited – Screening of proposed section 36 and marine licence variation proposal – Seagreen Alpha and Bravo Offshore Wind Farms, Firth of Forth - Response required by 03 March 2022  
**Date:** 25 March 2022 17:55:33  
**Attachments:** [image001.png](#)

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Dear Marine Scotland,

Thank you for consulting us on this and apologies for our delayed response.

This variation increases the height of some of the turbine blades for the consented Seagreen windfarm development. Previously, the applicant applied for removal of the capacity limit on the windfarm. This led to onshore works being required in East Lothian to allow the electricity to be exported.

The Screening Report notes this new connection at Cockenzie in section 1.1, but does not suggest any further works would be required as a consequence of the proposal to increase the height of the wind turbines. Scottish Government Guidance “Applying for Variation of section 36 consents of the Electricity Act for Generating Stations in Scotland” emphasises it is essential that the application documents give a clear and complete picture of what development would result if the varied consent is implemented. Therefore, if the increased size of the turbines will lead to the need for further onshore works this is part of the overall project and should be considered in coming to a Screening Opinion. As this has not been noted in the Screening Report I assume that no further onshore works will be required in relation to these works.

No visual information has been provided for impacts on East Lothian. In daylight, we do not consider there will be a significant effect that is different from that shown in the original EIA due to the distance. However, there could be an increase in the number or change to the location of aviation lights at night due to the increased hub height. This is a concern when viewed against the backdrop of the Bass Rock from North Berwick mainly. It would be helpful if a wireline of the existing and proposed aviation lighting could be provided to allow us to consider if this is likely to result in a significant change.

If there are no changes to the proposed onshore works within East Lothian, and no change to the visibility of night lighting, we do not consider that EIA assessment is required for impacts on East Lothian. If there is a significant increase in the visibility of lighting from East Lothian, or if there are changes to the onshore works, further assessment may be required.

The planning authority’s views on the likelihood of significant environmental effects are given only for the purpose of your consultation on this screening request. These comments are without prejudice to any subsequent consideration by the planning authority of any application made under Electricity Act process of the impacts of the proposed development, and the authority’s assessment of the proposal’s acceptability.

Regards,

J Squires

Pp Keith Dingwall

Planning Service Manager

Development

East Lothian Council

HADDINGTON

EH41 3HA

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**From:** [Squires, Jean](#)  
**To:** [Taylor K \(Kate\)](#)  
**Subject:** RE: Seagreen Wind Energy Limited – Screening of proposed section 36 and marine licence variation proposal – Seagreen Alpha and Bravo Offshore Wind Farms, Firth of Forth - Response required by 03 March 2022  
**Date:** 31 March 2022 12:48:05  
**Attachments:** [image001.png](#)

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Kate,

Thank you for confirming that the applicant states that no lighting will be visible from the coast and there will be no related additional onshore works. As the applicant has not supplied a ZTV of where the lights of the consented scheme are visible from, compared with the proposed scheme, we can't compare the two. However, our main concern about potential impact arising from changes from the consented scheme was on night time views from the coast, in particular *of* the Bass Rock and small islands *from* the coast. This is a highly scenic view, which is enjoyed at dawn and dusk, and even in the night where moonlight can light up the scene.

We take it that by 'the coast' the applicant means to include the harbour area and beaches around North Berwick and Yellowcraig, Tantallon Castle and the Dunbar cliff top path. As no lights will be visible from these areas, we agree no further EIA will be required to address this. From North Berwick Law, the number of lights will remain the same, and so the impact is unlikely to be greater than assessed.

Our other concern was that as the capacity limit has previously been removed, the larger turbines that are usually associated with greater capacity, might require further onshore works. If that were the case, this should be considered at the same time as the proposed alteration as part of the same project. As this is not the case consideration of this is not necessary.

We therefore agree that EIA is not required as far as impacts on interests with East Lothian are concerned.

Regards,  
J Squires  
Pp Keith Dingwall  
Planning Service Manager  
East Lothian Council

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# **Dundee City Council**

**From:** [Alistair Hilton](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** FW: Seagreen Wind Energy Limited – Screening of proposed section 36 and marine licence variation proposal – Seagreen Alpha and Bravo Offshore Wind Farms, Firth of Forth - Response required by 03 March 2022  
**Date:** 15 March 2022 13:57:04

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Apologies for delayed response. I can advise that Dundee City Council has no comment on the screening consultation.

Alistair Hilton  
Principal Planning Officer  
Planning Team  
City Development Department  
Dundee City Council  
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# **Fife Council**



**From:** [Martin McGroarty](#)  
**To:** [MS Marine Licensing](#)  
**Cc:** [Bamlett R \(Rebecca\)](#)  
**Subject:** 22/00446/CON - FW: Seagreen Wind Energy Limited – Screening of proposed section 36 and marine licence variation proposal – Seagreen Alpha and Bravo Offshore Wind Farms, Firth of Forth  
**Date:** 02 March 2022 11:35:24

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**FAO Kate Taylor**

Good morning Kate.

Since this request relates to an area outwith our geographical jurisdiction, Fife Council is unable to provide a formal screening opinion on this matter in this instance due to workload prioritisation.

However, having looked through the submitted Screening Report, I am of the view that we would not offer any contrary view to the findings therein, with the re-sizing of some of the wind turbines and the addition of a second export cable unlikely to significantly impact further on the environment than has already been assessed through the environmental assessments carried out to date, though we would expect NatureScot to have been consulted on these matters in any event.

Kind regards,  
Martin

**Martin McGroarty**

Lead Professional (Minerals)  
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Fife Council  
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# **Historic Environment Scotland**



HISTORIC  
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SCOTLAND

ÀRAINNEACHD  
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ALBA

**By email to:**

[MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot)

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

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131-668-8716  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our case ID: 300021099  
22 February 2022

Dear Marine Scotland

[The Marine Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017 Variations to the Section 36 consents and Marine Licences for the Seagreen Alpha and Seagreen Bravo Offshore Wind Farms, Firth of Forth EIA Screening Request \(January 2022\)](#)

Thank you for your consultation which we received on 03 February 2022. We understand that you are seeking our comments on an Environmental Impact Assessment (EIA) screening opinion for proposed variations to the Section 36 consents and Marine Licences for the Seagreen Alpha and Seagreen Bravo Off-Shore Wind Farms.

This letter contains our comments for our historic environment interests. These include land-based heritage assets such as world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories. We have also considered the effects of the proposals on marine heritage assets including Historic Marine Protected Areas (HMPAs) and undesignated marine cultural heritage features.

We also recommend that you seek advice from the relevant archaeology and conservation service on the historic environment impacts of the proposals. This may include matters such as undesignated land-based archaeology, and category B and C-listed buildings.

### **Section 36 C Variation and Marine Licence Variation**

We understand that the proposals seek to vary the Section 36 consents and Marine Licences granted in 2014 for the Seagreen Alpha and Seagreen Bravo off-shore wind farms.

These variations seek to change the parameters of 36 wind turbine generators (WTGs) to be installed as part of the Phase 2 construction works. These changes will allow for increases in rotor diameters as well as increases in tip and hub heights. Consequently, it is proposed that the wind turbine generators (WTGs) will reach a maximum height of 285m from Lowest Astronomical Tide (LAT) to blade tip. We note that no change is



proposed to the size or location of the development area or the number of turbines consented.

Additionally, we understand that the variation proposes an increase in the steel seabed deposits needed for the installation of the Offshore Substation Platform (OSP) forming part of the wind farm transmission infrastructure. The current Marine Licence for the Seagreen Offshore Transmission Asset allows for 13,000 tonnes of steel/iron deposits, and it is proposed to increase this allowance to 22,560 tonnes.

## **Our Advice**

We are content to agree with the findings included within the EIA Screening Report (17 January 2022) prepared in support of the variations that the changes proposed would not give rise to significant impacts on our historic environment interests further to those already identified in the Environmental Statement (2012) prepared in support of the original consents.

### *Impacts on Marine Historic Environment Features*

We note from the EIA Screening Report (17 January 2022) that potential impacts on marine historic environment features will be minimised through the implementation of a mitigation strategy involving the avoidance of any potential archaeological anomalies or known wrecks. We note that this mitigation strategy will be detailed in a Written Scheme of Investigation (WSI)/ Protocol for Archaeological Discoveries (PAD) prepared for the proposals. On the basis of this embedded mitigation, we are content that significant impacts on marine historic environment features are unlikely.

### *Impacts on the Setting of Terrestrial Heritage Assets*

Section 4.8 (Archaeology and Cultural Heritage) of the EIA Screening Report (17 January 2022) does not include an analysis of potential impacts caused by the proposed increases in turbine heights and rotor diameters on the setting of terrestrial heritage assets located on-shore. We have, however, undertaken a review of the Environmental Statement (2012) and the updated wireline visualisations prepared in support of Section 4.13 (Seascape, Landscape & Visual). While we note that there is likely to be some increased visibility of the proposals in views from coastal heritage assets, we are nevertheless content that these changes will not give rise to significant impacts on the setting of heritage assets in our remit.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Alison Baisden and they can be contacted by phone on 0131 668 8575 or by email on [Alison.Baisden@hes.scot](mailto:Alison.Baisden@hes.scot).

Yours faithfully

**Historic Environment Scotland**

**NatureScot**

**From:** [Caitlin Cunningham](#)  
**To:** [Taylor K \(Kate\)](#)  
**Cc:** [Bamlett R \(Rebecca\)](#); [Karen Taylor](#)  
**Subject:** RE: Seagreen Wind Energy Limited – Screening of proposed section 36 and marine licence variation proposal – Seagreen Alpha and Bravo Offshore Wind Farms, Firth of Forth - Response required by 03 March 2022  
**Date:** 16 March 2022 15:26:20

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Dear Kate,

Thank you for the consultation on the EIA Screening of a proposed Section 36 and Marine Licence variation at Seagreen. Thank you also for the extension.

Seagreen is proposing to vary the 2014 Consents to allow for changes principally to parameters of the consented, but not constructed, 36 WTGs (114 turbines at 209.7m are currently under construction). No changes to the turbine locations are proposed.

We met with Seagreen on 04/03/22 to discuss the Screening Report. We requested further information on the increase in steel seabed deposits and we are content with the additional context that has been provided by Seagreen. As the overall footprint is unchanged, we consider the increased deposits to have no material change and no likely significant environmental effect.

Overall we are content with the approaches and findings outlined in the Screening Report and annex reports such that we agree that there would be no material change to predicted ornithology or seascape/landscape impacts from the proposed variation. Therefore NatureScot consider that the proposed variation would not require a full EIA to support the variation application. Please see below for further advice specific to ornithology and SLVIA.

#### Ornithological advice

We are content with the CRM approach outlined in the Screening Report and Annex 1, but advise that 'flapping' flight should only be used for kittiwake and herring gull, with 'gliding' used for gannet instead. We also welcome the updated Band CRM using flight heights from Johnston *et al.* (2014), which we understand from our meeting with Seagreen will be presented alongside the variation application.

We agree with the conclusions of the Screening Report that the variation will not cause any material increases to impacts from the Seagreen Project as assessed under the 2014 consent.

#### SLVIA advice

We have reviewed Annex 2 and agree that the increase in turbine height would be discernible from viewpoints 2 and 5, resulting in significant effects, as noted in the original (2012) ES. However given the distance from shore and the current cumulative scenario(s), we agree with the conclusions of the Annex 2 report that the overall findings would not be materially different to those in the 2012 ES. Therefore NatureScot agree that there is no requirement to undertake a new SLVIA for the proposed variation.

We hope you find this advice useful.

Best Wishes,

Caitlin

**Caitlin Cunningham** (She/Her) | **Marine Sustainability Adviser** | **Sustainable Coasts & Seas**  
**NatureScot** | Battleby, Redgorton, Perth PH1 3EW | t: [REDACTED]  
[nature.scot](https://nature.scot) | [@nature\\_scot](https://twitter.com/nature_scot) | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

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# **Scottish Borders Council**



**From:** [Shearer, Scott](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** [OFFICIAL] Seagreen Alpha and Bravo Offshore Wind Farm Scottish Borders Council Screening Response  
**Date:** 22 March 2022 12:00:05  
**Attachments:** [image001.png](#)  
[image003.png](#)

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Dear Sir/Madam,

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)  
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007 (AS AMENDED)**

**SCREENING OPINION ON THE PROPOSED SECTION 36 CONSENT VARIATION AND MARINE LICENCE VARIATION APPLICATIONS IN RESPECT OF THE SEAGREEN ALPHA AND SEAGREEN BRAVO OFFSHORE WIND FARMS, FIRTH OF FORTH.**

**OUR REF; 22/00185/SCR**

I write with reference to the above screening request which has been under our consideration and apologise for the delay in responding due to other casework pressures.

We do not consider that the variation in tip height of 36 of the consented 150 turbines from 209.7m to 285m would cause environmental impacts on the Scottish Borders which would warrant an Environmental Impact Assessment.

In terms of landscape and visual effects we have assessed the potential impact on Scottish Borders receptors, including the Berwickshire Coast Special Landscape Area. The wireline images (Appendix 2 of the Screening Report) from viewpoints at distances of approximately 38 – 50km from the Fife coast demonstrate that the site will be visible, depending on the angle of elevation, as a distant feature on the horizon but the increased height is likely to be barely perceptible. Our Landscape Architect considered that with a distance of 60km or more from the Berwickshire coast the potential impacts on Scottish Borders receptors are unlikely to be significant and therefore an EIA is not required.

Otherwise we have no further comments to make on this proposed variation and comments we provided in response to the original scheme would remain relevant.

I trust that this is of assistance.

Kind regards,

Scott

Scott Shearer  
Peripatetic Planning Officer  
Planning Housing and Related Services  
Corporate Improvement & Economy  
Scottish Borders Council  
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\*\*\*\*\*

**Scottish Environmental Protection  
Agency**

**From:** [Planning South East](#)  
**To:** [MS Marine Licensing](#)  
**Cc:** [Bamlett R \(Rebecca\)](#)  
**Subject:** 4207 Screening of proposed section 36 and marine licence variation proposal – Seagreen Alpha and Bravo Offshore Wind Farms, Firth of Forth  
**Date:** 15 February 2022 11:53:49

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PUBLIC

Rebecca,

**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)  
REGULATIONS 2017 (AS AMENDED)  
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS  
2007 (AS AMENDED)**

**SCREENING OPINION ON THE PROPOSED SECTION 36 CONSENT VARIATION AND MARINE  
LICENCE VARIATION APPLICATIONS IN RESPECT OF THE SEAGREEN ALPHA AND SEAGREEN  
BRAVO OFFSHORE WIND FARMS, FIRTH OF FORTH.**

SEPA Ref 4207

Thank you for your email consultation.

We understand that the screening opinion is related to a variation in the turbines that have not been installed yet and to increase steel seabed deposits. *“SWEL is proposing to vary the 2014 Consents to allow for changes principally to parameters of the consented but not constructed 36 WTGs (phase 2). Varied parameters include an increase in rotor diameter, blade chord width, maximum and minimum tip height and hub height (see Table 1.1 for details). No changes to piling parameters are included in the variation. SWEL are also proposing to vary the 2014 Consents to allow for an increase in steel seabed deposits associated with the OTA Marine Licence. For the purposes of this document, these proposed parameter changes are referred to as ‘the Variation’.”*

The Variation is therefore related to the offshore part of the project.

As SEPA only provides comments in relation to onshore related aspects, we have no comments to make in relation to this screening opinion.

Please do not hesitate to contact me for any further clarification.

Regards

*Silvia Cagnoni*  
*Senior Planning Officer*  
*Scottish Environment Protection Agency*  
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m: [REDACTED]