

Aberdeenshire Council

Our Ref: ENQ/2023/0164
Your Ref:

Ask for: Iain McMillan
Tel: 01467 534919
Email: iain.mcmillan@aberdeenshire.gov.uk

Marine Scotland
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

1 March 2023

Dear Sir/Madam

EIA Screening/Scoping Opinion for Additional Landfall Works at Inch Cape Offshore Windfarm, Firth of Forth

Thank you for consulting Aberdeenshire Council on this request for a screening opinion from Scottish Ministers for additional landfall works for Inch Cape Offshore Windfarm. Having reviewed the submission, I would provide the following observations.

The interests of Aberdeenshire Council are limited to those effects or impacts which would occur within the Aberdeenshire Council Area. In this instance, the location of the landfall works is near Cockenzie, East Lothian which is a significant distance from the Aberdeenshire Council boundary. The applicant wishes to remove and reinstate sections of an existing sea defence to allow cable installation and relocated a Council outfall pipe to facilitate the installation of the Offshore Export Cables.

The applicant notes that the proposed works are relatively small in scale, temporary and would take place within the existing consented Inch Cape Export Cable Corridor. The report provided with the request concludes that the proposed works would not result in any potential significant effects and as such, it can be concluded that an Environmental Impact Assessment (EIAR) is not required.

Aberdeenshire Council is in agreement with this conclusion and consider that that the potential environmental impacts of the variation are unlikely to be so widespread as to warrant the submission of a complete EIAR.

This screening opinion is offered without prejudice to the assessment of any future application or further screening requests. I trust the above suitably addresses this consultation request, however, should you have any further queries, please contact the officer names at the top of this letter.

Yours faithfully

[Redacted]

Paul Macari
Head of Planning and Economy

Angus Council

From: [Stephanie G Porter](#)
To: [MS Marine Renewables](#)
Subject: RE: Inch Cape Offshore Limited – Additional Landfall Works – Inch Cape Offshore Windfarm (Revised Design), Firth of Forth – Consultation on Request for Screening Opinion – Response Required by 28 February 2023 - OUR REF: 23/00066/PREAPP
Date: 07 February 2023 13:52:30

Dear Sir/Madam,

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

**CONSULTATION UNDER PART 2, REGULATION 10(5) OF THE EIA
REGULATIONS**

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 additional landfall works at East Lothian would not result in impacts to Angus which are of significance or materially different to those of the consented Inch Cape Project.

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

Yours sincerely,

Stephanie Porter | Team Leader – Development Standards | Planning & Sustainable Growth | Angus Council | Angus House | Orchardbank Business Park, Forfar, DD8 1AN | (01307 492378)

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Dundee City Council

From: [Alistair Hilton](#)
To: [MS Marine Renewables](#)
Subject: RE: Inch Cape Offshore Limited – Additional Landfall Works – Inch Cape Offshore Windfarm (Revised Design), Firth of Forth – Consultation on Request for Screening Opinion – Response Required by 28 February 2023
Date: 06 March 2023 08:44:50

Apologies – I thought we had responded to this request. Thank you for your email. I can advise that Dundee City Council has no comment on this request for a screening opinion.



Alistair Hilton

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

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P [01382 433760](tel:01382433760)

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A [Dundee House, 50 North Lindsay Street, DUNDEE, DD1 1QE](#)

East Lothian Council

From: [Squires, Jean](#)
To: [MS Marine Renewables](#)
Cc: [Cowan L \(Lauren\)](#); [Morrison S \(Stephanie\)](#); [McGinn T \(Toni-Marie\)](#)
Subject: FW: Inch Cape Offshore Limited – Additional Landfall Works – Inch Cape Offshore Windfarm (Revised Design), Firth of Forth – Consultation on Request for Screening Opinion – Response Required by 28 February 2023
Date: 01 March 2023 15:51:54

Dear Lauren,

I refer to your consultation of East Lothian Council on the above and have the following comments.

Material assets – roads

I do not consider this change will have a significant effect on the environment in relation to access, traffic and transport requiring EIA. While the works may lead to additional vehicle movements in delivering material to, removing material from site I do not consider these would be significant enough to warrant EIA.

Air/noise

I do not anticipate any significant impacts due to noise/vibration, dust or on air quality as a consequence of these additional works and such that assessment through EIA is submitted.

Flood risk

With regards to flood risk management, the only impacts would be during the temporary works – where the level of the walls will be reduced etc. There is mitigation detailed to combat this but without that mitigation, there would be impacts. The Screening Report states that “This temporary flood defence will be in place prior to any removal of the seawall. There would therefore be no change in flood risk to the area. As such there is no requirement for EIA”. As long as this is adhered to, I do not expect any increased flood risk on site.

With regards to the actual works to the wall, there will be works to excavate rock armour and remove sections of wall, this may have potential to impact on the environment – with concrete being poured during the remedial works. The key thing on this front is whether the works they undertake will be in water, or in a dry working area (where there’d likely be no/less impact). I expect SEPA will comment on this.

Cultural heritage

The additional landfall works will fall on an area of previously reclaimed land so have no further or limited/ no heritage implications.

Biodiversity

The additional works will take place in the intertidal area and below the low water mark. Table 3.1 identifies receptors which have potential to lead to significant effects and whether or not they require to be further considered. The potential receptors were benthic ecology and ornithology, which were given further consideration, and natural fish and shellfish and marine mammals, which were not. Others with more expertise on marine biodiversity and the qualifying features of European Sites will comment on this. The Council would support any views of NatureScot on impacts on marine mammals and the bird life of the Special Protection Areas.

Climate

The Screening Report does not discuss any potential impact on climate. I refer to the Institute of Environmental Management & Assessment (IEMA) Guide (2022): “Assessing Greenhouse Gas Emissions and Evaluating their Significance.”

Almost all projects will contribute to climate change, the consequences of which could lead to significant effects across all receptors. Emissions are approaching the limits under the Paris Agreement. These works will require the use of both precast concrete and powercrete, which will emit climate forcing gas in their manufacture. Concrete manufacture is a considerable source of emissions worldwide. It is expected that there will also be emissions of climate forcing gas from the operation of machinery.

This proposal is part of a project (renewable energy generation from offshore wind) which will replace activity in the baseline that has a higher greenhouse gas impact through helping to de-carbonise its electricity supply. Decarbonising the electricity supply is an important strand of meeting climate change targets.

The Guidance noted above suggests that EIA for any proposed project should give proportionate consideration to how the project will contribute to or jeopardise the achievement of targets to reduce greenhouse gas emissions from all sectors. No information has been given on the greenhouse gas emissions of this proposal, nor an appraisal on the impact on Scottish Government targets. You may wish to seek this to decide whether or not the project will have significant impacts on climate.

This guidance further notes: "For proposed projects where the need for an EIA has been screened out, it is still important that its GHG emissions are minimised wherever possible, as emissions of any scale contribute cumulatively to global climate change. Undertaking a proportionate assessment of GHG emissions on non-EIA projects is therefore good practice to support decisions that reduce GHG emissions".

No mitigation appears to be proposed for any residual effects, and this should be considered where possible. Regardless of the overall balance of greenhouse gas emissions of the project as a whole, the goal should be to reduce its residual emissions at all stages. If that is possible through the use of different methods or materials this should be considered.

I would therefore encourage submission of information on the greenhouse gas emissions of the proposal and any mitigation, whether or not EIA is required.

Generation of waste

The Screening Report states that there is an allowance for disposal of sections of the sea defence wall. The Report does not state what the destination for this is, and whether it can be re-used or recycled. This could usefully be considered through the application.

Conclusion

I do not consider the impact of the proposal is likely to be significant, for the receptors considered in the Screening Report, on receptors in or affecting East Lothian. I am content to leave it to you to determine whether or not you consider the effects on climate and waste are likely to be significant.

The planning authority's opinion on the likelihood of significant environmental effects is reached only for the purpose of your consultation above. Our views are given without prejudice to any subsequent consideration by the planning authority through any other formal process of the impacts of the proposed development, and the authority's assessment of the acceptability or otherwise of the proposed development.

Should you wish to discuss any of the above in more detail please contact J Squires at jsquires@eastlothian.gov.uk or the Policy and Strategy Team within the Planning Service via email to policy&projects@eastlothian.gov.uk.

Regards,

J Squires

Pp Keith Dingwall

Planning Service Manager

Write or visit: Planning Service, East Lothian Council, John Muir House, Haddington, EH41 3HA

Phone (switchboard): 01620 827827

Website: www.eastlothian.gov.uk/localplan

Fife Council

From: [Bryan Reid](#)
To: [MS Marine Renewables](#)
Subject: 23/00314/CON - Inch Cape Offshore Limited – Additional Landfall Works – Inch Cape Offshore Windfarm (Revised Design), Firth of Forth – Consultation on Request for Screening Opinion
Date: 16 February 2023 10:42:35
Attachments: [3391195.pdf](#)

FAO Lauren Cowan

Good morning Lauren,

I write in response to the attached email requesting Fife Council's comments on the recent Screening request submitted by Inch Cape Offshore Limited for proposed additional landfall works associated with the Inch Cape Offshore Windfarm (Revised Design) development. Having reviewed the proposal, Fife Council are of the opinion that the proposed additional landfall works would be unlikely to give rise to significant impacts on the environment which would require to be assessed through EIA. Accordingly, Fife Council is satisfied that EIA would not be required.

Kind regards,
Bryan Reid
Lead Professional - Strategic Development
Major Business and Customer Services
Planning Services
Fife Council

www.fife.gov.uk Follow us on twitter: [@FifePlanning](https://twitter.com/FifePlanning)

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Please note that I am unavailable every second Monday

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Fife Council

HES



By email to:

MS.MarineRenewables@gov.scot

Marine Scotland (Marine Renewables)
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

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

Our case ID: 300019591

28 February 2023

Dear Marine Scotland

[The Marine Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017
Inch Cape Offshore Limited - Additional Landfall Works - Inch Cape Offshore Windfarm \(Revised Design\), Firth of Forth - Consultation on Request for Screening Opinion](#)

Thank you for your consultation which we received on 07 February 2023 seeking our comments on an Environmental Impact Assessment (EIA) screening opinion for the above proposed development. This letter contains our comments for our historic environment interests. That is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, gardens and designed landscapes and battlefields on their respective Inventories.

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

Our Screening opinion

We understand that the marine licence is for a proposed seawall, revetment works and the East Lothian Council (ELC) outfall diversion to facilitate the export cable installation in relation to the Inch Cape Offshore Wind Farm.

We note that the assessment states that there will be no further significant impacts from the proposals, and we are content to agree with this assessment regarding our interests. We welcome the proposed mitigation noted in the Screening Report, including the implementation of a WSI, reporting protocols and the development of an agreed programme of mitigation.

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

Yours faithfully

Historic Environment Scotland

NatureScot

From: [Malcolm Fraser](#)
To: [MS Marine Renewables](#)
Cc: [Cowan L \(Lauren\)](#); [Morrison S \(Stephanie\)](#); [McGinn T \(Toni-Marie\)](#)
Subject: RE: Inch Cape Offshore Limited – Additional Landfall Works – Inch Cape Offshore Windfarm (Revised Design), Firth of Forth – Consultation on Request for Screening Opinion – Response Required by 28 February 2023
Date: 14 February 2023 15:16:06

Lauren –

Thank you for consulting us on this request for an EIA Screening Opinion relating to landfall engineering works at Cockenzie for Inch Cape Offshore Limited.

We have reviewed the applicant’s Screening Request and Supporting Information document (“the Report”).

NatureScot advice - EIA

We understand that this proposal follows detailed site investigation, and identification of additional engineering works that were not envisaged in previous Marine Licence applications. The additional works involve:

- Removal and reinstatement of sections of sea wall and rock revetment
- Diversion of an ELC outfall pipe

We note that the Report (sections 4.1 and 4.2) identifies possible effects from the additional works on benthic ecology and ornithology. We accept the rationale set out in the Report that the additional works are small-scale and temporary, and their scale and magnitude fall within the existing consented parameters.

We are therefore content that the additional works will not generate significant effects on these receptors, and in our view an EIA is not required.

NatureScot advice - HRA

We highlight that we do not support the proposed approach to HRA (section 4.5) which concludes that ‘no LSE’ arises from the additional works. We advise that there is connectivity from the additional works to several European sites, and that they generate likely significant effects upon those sites.

However, as the scale and magnitude of these effects fall within existing consented parameters, we advise that the previous HRA and appropriate assessment can be used in support of these additional works. In our view the previous conclusions of no adverse effects on site integrity on any European site apply to the current proposal.

I hope this advice is helpful, you can contact me if you would like to discuss it further.

All the best.

--

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

NatureScot | Silvan House | 3rd Floor East | 231 Corstorphine Road | Edinburgh | EH12 7AT | t: 0131 316 2629

NàdarAlba | Taigh Silvan | 3mh Làr an Ear | 231 Rathad Chros Thoirphin | Dùn Èideann | EH12 7AT

[nature.scot](#) – A nature-rich future for all – [@nature_scot](#)

Scottish Borders Council

From: [Miller, Craig](#)
To: [MS Marine Renewables](#)
Cc: [Cowan, L. \(Lauren\)](#); [Morrison, S. \(Stephanie\)](#); [McGinn, T. \(Toni-Marie\)](#)
Subject: [OFFICIAL] FW: Inch Cape Offshore Limited – Additional Landfall Works – Inch Cape Offshore Windfarm (Revised Design), Firth of Forth – Consultation on Request for Screening Opinion – Response Required by 28 February 2023
Date: 27 February 2023 15:35:18
Attachments: [image001.png](#)
[image003.png](#)

Dear Sir/Madam

Given the location of the landfall, we consider that we have no remit to offer comment on the need for an EIA in this instance but would thank you for consulting us,

Regards

Craig Miller
Principal Planning Officer
Planning Housing and Related Services
Scottish Borders Council
Tel: 01835 825029
E-mail : cmiller@scotborders.gov.uk

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SEPA

From: [Planning South](#)
To: [MS Marine Renewables](#); [Cowan L \(Lauren\)](#)
Subject: RE: Inch Cape Offshore Limited – Additional Landfall Works – Inch Cape Offshore Windfarm (Revised Design), Firth of Forth – SEPA Response (Ref. 8164)
Date: 10 February 2023 15:27:33

OFFICIAL

Dear Lauren,

Thank you for the above consultation. We have no comments to make on this EIA screening request as works which are purely within the marine environment, including at any stage of EIA, falls below our consultation thresholds. Please refer to Section 2.2 of our [SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations](#). Please consider our standing advice in Section 3 and Table 1 as SEPA's views and consultation response, where relevant.

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.

Kind regards,
Simon

Simon Watt
Senior Planning Officer
Scottish Environment Protection Agency (SEPA)
email: planning.south@sepa.org.uk
mobile: [Redacted]

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