

Angus Council

From: [MD Marine Licensing](#)
To: [MD Marine Renewables](#)
Subject: FW: 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024
Date: 20 March 2024 11:52:56
Attachments: [image001.png](#)
[OTA Marine Licence Variation Application_Redacted.pdf](#)
[image002.png](#)

From: Stephanie G Porter <PorterSG@angus.gov.uk>
Sent: Wednesday, March 20, 2024 11:38 AM
To: MD Marine Licensing <MD.MarineLicensing@gov.scot>
Subject: RE: 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024

Dear Sir/Madam,

**MARINE (SCOTLAND) ACT 2010 & MARINE AND COASTAL ACCESS ACT 2009
PART 4 MARINE LICENSING**

**REVISIONS TO THE OFFSHORE TRANSMISSION ASSET MARINES LICENCE FOR SEAGREEN
ALPHA AND BRAVO OFFSHORE WIND FARMS.**

I refer to your email below and can confirm Angus Council has reviewed the consultation and has no comments to make in relation to the amendments proposed in so far as any potential impacts they may have on Angus,

Yours sincerely,

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

Covid: As restrictions ease, the emphasis will continue to be on personal responsibility, good practice and informed judgement. [Get the latest information on Coronavirus in Scotland.](#)

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BT

From: radionetworkprotection@bt.com
To: [MD Marine Renewables](#)
Cc: radionetworkprotection@bt.com
Subject: FW: WID13365 - 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024
Date: 13 March 2024 09:21:24
Attachments: [image001.png](#)
[image002.png](#)
[OTA Marine Licence Variation Application_Redacted.pdf](#)



OUR REF: WID13365 (Original ref WID11980M1-M4)

-
Thank you for your email dated 05/03/24.

We have studied this Marine Licence Variation proposal with respect to EMC and related problems to BT point-to-point microwave radio links. The conclusion is that this variation for the 3 export cable trenches between the development area and the landfall point laid out within the export cable corridor, with a maximum total length of 190 kilometres should not cause interference to BT's current and presently planned radio network as there appears to be no structures at height. Original response on our Ref WID11980M1-M4 still remains.

BT requires 100m minimum clearance from any structure at height to the radio link path. If the proposed locations change please let us know and we can reassess this again for you.

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

Regards

Debra Baldwin
National Radio Planner
Network Planning



This email contains information from BT Group that might be privileged or confidential. And it's only meant for the person above. If that's not you,

Dundee City Council

From: [Alistair Hilton](#)
To: [MD Marine Renewables](#)
Subject: RE: 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024
Date: 05 March 2024 16:16:28
Attachments: [image001.png](#)
[image002.png](#)

I can advise that Dundee City Council has no comment on the variation.

Regards,



Alistair Hilton

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

E alistair.hilton@dundeecity.gov.uk

P [01382 433760](tel:01382433760)

W www.dundeecity.gov.uk

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

Forth Ports

From: [Sandra Robson](#)
To: [MD Marine Renewables](#)
Subject: FW: 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024
Date: 29 March 2024 10:31:07
Attachments: [image001.png](#)
[image003.png](#)

Dear Sir/Madam

We refer to the application and confirm Forth Ports has no objection to the Variation

Kind regards

Sandra Robson | PA to the Chief Legal and Property Officer | Forth Ports Limited

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

T: 0131 555 8700 | Mob: [REDACTED] <https://forthports.co.uk>

Joint Radio Company

From: [JRC Windfarm Coordinations Old](#)
To: [MD Marine Renewables](#)
Subject: Seagreen Alpha and Bravo Offshore Wind Farms [WF951790]
Date: 26 March 2024 09:56:00

Dear scottish,

A Windfarms Team member has replied to your co-ordination request, reference **WF951790** with the following response:

Hi Kate,

Thanks for the clarification, I can confirm we do not have any concerns then. Have now found positions on our mapping software and can see there are no issues.

Kindest Regards,

Heather Willoughby

We hope this response has sufficiently answered your query.

If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?auth=o1xtqgaaabzqaaaaBGAEzfcLs9iX5w%3D%3D>

**Marine Directorate – Science,
Evidence, Data and Digital**



[REDACTED]

Kate Taylor
Marine Directorate Licensing Operations Team
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

26 March 2024

**00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation
– Consultation**

Marine Directorate advisers have reviewed the request from MD-LOT and provide the following advice.

Commercial fisheries

MD-SEDD note that the original Environmental Statement (ES) found no significant effects to the fishing industry as long as export cables were buried or had cable protection installed if they could not be adequately buried. The ES also presumed fishing could resume once cables had been buried or protected and the relevant surveys had been carried out to determine this had been successful. MD-SEDD note that no gear snagging was found during the over-trawl survey completed after works on the cables were finished. MD-SEDD advise that an increase in the percentage of cable requiring rock protection would be unlikely to alter the conclusions from the ES, and as the cable plan was already approved and cable works have been completed, MD-SEDD are content with the variation to the marine licence.

Yours sincerely,



Renewables and Ecology Team

Marine Directorate – Science, Evidence, Data and Digital



Maritime & Coastguard Agency

From: [navigation safety](#)
To: [MD Marine Renewables](#)
Cc: [Nick Salter](#); [Vinu John](#); [Helen Croxson](#); [Vaughan Jackson](#)
Subject: RE: 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024
Date: 18 March 2024 16:35:52
Attachments: [image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image001.png](#)

Good afternoon Kate,

Thank you for the opportunity to comment on the Marine Licence Variation request for Seagreen Alpha and Bravo Offshore Wind Farms - Offshore Transmission Assets. The UK Technical Services Navigation team of the Maritime and Coastguard Agency has reviewed the request received. We would like to comment as follows:

We note that Seagreen Wind Energy Limited (SWEL) seeks to vary the wording of Paragraph 4, in section 2.2 of the 'Description of the Development' to better represent the total as-laid length of rock protection required. Changes to the total from 19km to 190 km and an update to the percentage which may require rock armoured or concrete mattress protection to 24% or 45km are sought.

The paragraph as presented will read as follows:

'There will be up to 3 export cable trenches between the development area and the landfall point laid out within the export cable corridor, with a maximum total length of 190 kilometres ("km"). A maximum of 24% (45 km) will require rock armoured or concrete mattress protection.'

The MCA confirms we have no objections to a variation being granted on this occasion. This is on the understanding that all maritime safety legislation is adhered to, and that the original conditions and risk mitigation measures which were previously agreed during the consenting process continue to be complied with.

If you have any questions on this response, please let us know.

Best regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
UK Technical Services Navigation


vaughan.jackson@mcga.gov.uk

Maritime & Coastguard Agency
Bay 2/25, Spring Place
105 Commercial Road,



Maritime &
Coastguard
Agency

Southampton SO15 1EG



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www.gov.uk/mca

NatureScot

From: [Caitlin Cunningham](#)
To: [MD Marine Renewables](#)
Subject: RE: 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024
Date: 27 March 2024 09:11:40
Attachments: [image001.png](#)
[image002.png](#)

Dear Kate,

Proposal

Thank you for the consultation on the Marine Licence variation for Seagreen Offshore Wind Farm. We have reviewed the cover letter (LF000009-CST-OF-LIC-LET-0028 dated 23/01/24) and note that the variation covers the following amendments:

- Maximum total length of 190 km for the export cables to reflect the as built length – previously 530 km maximum.
- Maximum of 45 km cable protection along the export cables – previously 26.5 km maximum.

Environmental Impact Assessment (EIA)

Export cable length

Regarding the maximum total length of 190 km for the export cables, we agree that this falls within the existing consented parameters, with the associated impacts previously all been assessed as not significant (in EIA terms).

Export cable protection

It is proposed to increase the maximum cable protection required along the export cables from 26.5 km to 45 km. We agree with the applicant that the increased cable protection does not change the previous Environmental Statement conclusions of “negligible” impact, particularly in relation to impacts to/from:

- Electro-Magnetic Field (EMF) – we agree with the reasoning that rock protection provides similar levels of shielding from EMF impacts as direct burial;
- change in substrate/habitat type – given cable (rock) protection is used in areas where burial is not possible due to hard/rocky seabed, we agree with the reasoning that this does not represent a significant change in substrate/habitat type; and
- Annex I habitat – areas of Annex I habitat were identified through pre-construction surveys and avoided during cable installation.

Thus, we agree that the magnitude of impacts fall within the existing consented parameters, which have previously all been assessed as not significant (in EIA terms).

Habitats Regulations Appraisal (HRA)

Outer Firth of Forth and St Andrews Bay Complex SPA

The Outer Firth of Forth & St Andrews Bay Complex SPA is designated for the protection of various breeding and non-breeding birds. The offshore export cable from Seagreen Offshore Wind Farm into Carnoustie overlaps with the Outer Firth of Forth and St Andrews Bay Complex SPA. This Marine Licence variation provides no indication of location for the increased cable

protection. However, the Cable Burial Depth Figure (SEA-M-PHY-0057-01) submitted with the Offshore Transmission Asset Cable Plan Rev 06 (issued for consultation on 07/12/22) indicates that a small section of the export cable that overlaps with the SPA would not reach the 0.5 m minimum burial depth and would therefore require cable protection. As such, there is connectivity to this European site and the Habitats Regulations Appraisal (HRA) process applies.

We advise that the increased cable protection will have no likely significant effect on any of the qualifying features of the Outer Firth of Forth & St Andrews Bay Complex SPA. This is due to small scale and localised nature of the proposed activities, as well as the cable (rock) protection only being used in areas where burial is not possible due to hard/rocky seabed. Thus, we are content that this does not represent a significant change in substrate/habitat type and would therefore not result in impacts on the supporting habitats of the Outer Firth of Forth & St Andrews Bay Complex SPA.

Nature Conservation Marine Protected Areas (ncMPAs)

Firth of Forth Banks Complex Nature Conservation MPA

The offshore export cable from Seagreen Offshore Wind Farm into Carnoustie overlaps with the Firth of Forth Banks Complex ncMPA. This Marine Licence variation provides no indication of location for the increased cable protection. However, the Cable Burial Depth Figure (SEA-M-PHY-0057-01) submitted with the Offshore Transmission Asset Cable Plan Rev 06 (issued for consultation on 07/12/22) indicates that large sections of the export cable that overlaps with the ncMPA would not reach the 0.5 m minimum burial depth and would therefore require cable protection.

The increased cable protection is capable of affecting the protected features of this ncMPA. In particular, the ocean quahog and offshore subtidal sands and gravels features are sensitive to physical disturbance and change in habitat type. However, the proposed activities are small scale and localised in nature (when compared to the total extent of the ocean quahog and offshore subtidal sands and gravels feature across the entire ncMPA), such that we consider that these effects are insignificant. Thus, we consider any effects to be insignificant. Further assessment is therefore not required.

Other comments

Once works are complete, we request a map of the export cable route with burial depths and cable protection indicated, overlain with the relevant designated sites for comparison, is provided to MD LOT and ourselves.

Conclusion

We support the applicant's position that the magnitude of impacts fall within the existing consented parameters, which have previously all been assessed as not significant (in EIA terms). Any impacts are small scale and localised and do not represent a material change from what was assessed previously via HRA. Therefore, we can confirm that the proposed activities will not have a likely significant effect on a Special Area of Conservation (SAC), Special Protection Area (SPA), proposed SPA (pSPA) or Ramsar site and the activity is not capable of affecting (other than insignificantly) a Marine Protected Area (MPA) or proposed MPA (pMPA).

I hope this advice is of assistance.

Best Wishes,

Caitlin

Caitlin Cunningham (she/her) | Marine Sustainability Adviser

NatureScot | Meadowbank House | 6th Floor South | 153 London Road | Edinburgh | EH8 7AU

| t: 01738 458531

[nature.scot](https://www.nature.scot) | [@NatureScot](https://twitter.com/NatureScot) | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

I work compressed hours and do not work Friday afternoons.

Northern Lighthouse Board

From: [Adam Lewis](#) on behalf of [navigation](#)
To: [MD Marine Renewables](#)
Subject: RE: [EXT] 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024
Date: 06 March 2024 13:11:40
Attachments: [image001.png](#)
[image003.png](#)

Good afternoon Kate,

NLB have no objection to the proposed ML variation for the Seagreen A&B OWF, increasing the total length of export cable requiring protection.

Regards

Adam

Adam Lewis
Coastal Inspector
NLB Navigation Department
0131 4733197 / 

Scottish Fishermen's Federation

From: [Mohammad Fahim Hashimi](#)
To: [MD Marine Renewables](#)
Cc: [Elspeth Macdonald](#)
Subject: RE: 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024
Date: 01 April 2024 16:26:42
Attachments: [image001.png](#)
[image003.png](#)

Dear Kate,

Thank you for sharing this consultation opportunity with SFF.

We have noted from the consultation document/the developer's application that the export cable protection works have already been completed but application for license variation is being shared consultation now which seems to be too late to comment on. Therefore, we have no adverse comment to make on this particular consultation at this stage.

Best wishes

Fahim Mohammad Hashimi
Offshore Energy Policy Manager

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

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The Royal Yachting Association

From: [Pauline McGrow](#)
To: [SD Marine Renewables](#)
Subject: RE: 00010726 - Seagreen Alpha and Bravo Offshore Wind Farms - Marine licence variation - Consultation - Response required by 02 April 2024
Date: 23 March 2024 09:46:33
Attachments: [msg004.png](#)
[msg005.png](#)
[msg001.png](#)

Hi Kate,

I write to inform you that RYA Scotland has no comment that they wish to make on this application.

Kind Regards

Pauline

Pauline McGrow
Senior Administrator
Mob: [REDACTED]

Royal Yachting Association Scotland
T: 0131 317 7388
E: pauline.mcgrow@ryascotland.org.uk



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RSPB

FAO: Kate Taylor
Marine Scotland Licensing Operations Team
Marine Scotland
By email: MS.MarineRenewables@gov.scot



29th March 2024

Dear Kate,

Seagreen Alpha and Bravo Offshore Wind Farms - Offshore Transmission Assets - Application to vary Marine Licence MS-00010467

Thank you for consulting RSPB Scotland on the above application.

Acknowledging that there are inherent challenges and uncertainties associated with the development of offshore windfarms, and that plans will necessarily need to be varied as developments are implemented, RSPB Scotland would be interested to be informed as to whether there is a freely and publicly accessible GIS repository of information to provide for 'as built' developments to be viewed and interrogated, to allow for a better understanding of the cumulative impacts of developments, for example.

RSPB Scotland is aware of the '4Offshore' private sector resource ([Global Offshore Renewable Map | 4C Offshore](#)) but subscriptions are prohibitively expensive and, in any case, the resource does not appear to provide information about variations to consents to allow for such cumulative impacts to be considered.

Yours sincerely,


Peter Hearn

Head of Planning, RSPB Scotland

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Edinburgh Park
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