

Lees E (Emma)

From: KellyR <KellyR@angus.gov.uk>
Sent: 04 June 2019 14:17
To: MS LOT Seagreen Phase One Representations
Subject: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation Response

Dear Sirs,

In response to your consultation on the addendum to the Seagreen Project I can advise that my Council has reviewed the information and can confirm that it has no comments to make in relation to this matter.

Kind regards,

Ruari Kelly

Ruari Kelly | Planning Officer (Development Standards) | Angus Council | Planning & Communities
| Angus House : Orchardbank Business Park, Forfar, DD8 1AN. ☎ (01307) 492125

This message is strictly confidential. If you have received this in error, please inform the sender and remove it from your system. If received in error you may not copy, print, forward or use it or any attachment in any way. This message is not capable of creating a legal contract or a binding representation and does not represent the views of Angus Council. Emails may be monitored for security and network management reasons. Messages containing inappropriate content may be intercepted. Angus Council does not accept any liability for any harm that may be caused to the recipient system or data on it by this message or any attachment.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Lees E (Emma)

From: andy.mulholland@dundeecity.gov.uk
Sent: 29 May 2019 11:40
To: MS LOT Seagreen Phase One Representations
Subject: Re: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation

Dear sir/madam

Thank you for your invitation to comment on the Addendum of Additional Information to the EI Report. Please note that the local Planning Authority has no comments to make at this time.

Regards
Andrew

Andrew Mulholland
Planning Officer
Planning Team
City Development Department
Dundee City Council
50 North Lindsay Street
DUNDEE
DD1 1LS

Phone: 01382 433612

Email: andy.mulholland@dundeecity.gov.uk

Web Page: <http://www.dundeecity.gov.uk>

This email and any files transmitted with it is confidential and intended solely for the person or organisation to whom it is addressed. If you are not the intended recipient, you must not read, copy or disseminate the information or take any action in reliance on it and it would be appreciated if you would also notify the sender by reply email and then delete this email immediately. All messages passing out of this gateway are checked for viruses but Dundee City Council strongly recommends that you check for viruses using your own virus scanner as the Council will not take responsibility for any damage caused as a result of virus infection.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Lees E (Emma)

From: Squires, Jean <jsquires@eastlothian.gov.uk>
Sent: 15 July 2019 16:52
To: Lees E (Emma); MS Marine Renewables
Cc: Drew J (Jessica)
Subject: RE: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation Response by 08/07/19 - NIL RETURN RESPONSE

Emma,

I apologise for missing the closing date for responding to your consultation below. The Addendum concerns ornithological issues, in particular the potential impact of the proposal including in combination on qualifying interests of certain Natura 2000 sites. The Council defers to the expertise of SNH in this matter. As noted in our response to the original application, we do value our birdlife and other biodiversity that visits our shores and waters adjacent to our area, that could potentially be impacted by this proposal.

Therefore our original response stands, namely that we do not object to the proposal(s) provided

1. Conditions are placed on the consent which achieve the aims of the conditions appended to our original response; and
2. SNH consider that any adverse effects on the integrity of a Natura 2000 site within or adjacent to East Lothian, or where the qualifying interests visit the East Lothian or the coast off East Lothian, are less than the currently consented scheme in the same location.

Regards,
Jean

Jean Squires
Planner (Monday – Thursday)
Planning Service
Development
East Lothian Council
John Muir House
HADDINGTON
EH41 3HA

Email: jsquires@eastlothian.gov.uk
Tel: 01620 827370
Web: www.eastlothian.gov.uk/ldp

From: Emma.Lees@gov.scot <Emma.Lees@gov.scot>
Sent: 09 July 2019 11:56
To: Policy & Projects <policy&projects@eastlothian.gov.uk>
Cc: Jessica.Drew@gov.scot
Subject: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation Response by 08/07/19 - NIL RETURN RESPONSE

Dear Sir/Madam,

The closing date of the 08 July 2019 for the consultation on the addendum has now passed and we haven't received a response from you. Therefore, we are assuming a nil return.

Lees E (Emma)

From: Martin McGroarty <Martin.McGroarty@fife.gov.uk>
Sent: 01 July 2019 15:49
To: MS Marine Renewables
Subject: 04/06/19- PRIORITY- 19/01580/CON- KW- 18/02799/CON - PRIORITY TEAM - Seagreen Wind Energy Limited - Addendum of Additional Information

FAO Hannah Duffin

Dear Hannah,

**ELECTRICITY ACT 1989 (AS AMENDED)
MARINE (SCOTLAND) ACT 2010
MARINE AND COASTAL ACCESS ACT 2009
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)
THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (AS AMENDED)**

I refer to your consultation email of 27th May, 2019 regarding the above and I can confirm that, having consulted with colleagues, Fife Council has no further comment to make on this matter at this time.

Kind regards,
Martin

Martin McGroarty,
Lead Professional (Minerals)
Economy, Planning & Employability Services, Fife Council, Fife House, North Street, GLENROTHES, Fife. KY7 5LT

03451 55 11 22 development.central@fife.gov.uk

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to:

Seagreen.Representations@gov.scot

Ms Sophie Humphries
Marine Scotland Licensing Operations Team
Marine Scotland
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

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

Our case ID: 300021099

01 July 2019

Dear Ms Humphries

**The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Seagreen Phase 1 Offshore (Optimised) Wind Farm
Addendum**

Thank you for your correspondence dated 27 May 2019 seeking our comments on the Addendum for the above proposal. This letter contains our comments for our historic environment interests. That is World Heritage Sites, scheduled monuments and their settings, category A listed buildings and their settings, Inventory gardens and designed landscapes (GDL), Inventory battlefields and Historic Marine Protected Areas. In this case our advice also includes matters relating to marine archaeology outwith the scope of the terrestrial planning system. You should also seek advice from the relevant local authorities' archaeology and conservation services for matters including unscheduled archaeology and category B and C-listed buildings.

A new Historic Environment Policy for Scotland (HEPS 2019) was adopted on the 01 May 2019, when it replaced the current Historic Environment Scotland Policy Statement (HESPS 2016). The new Historic Environment Policy for Scotland is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. This includes our Managing Change in the Historic Environment Guidance Notes. All of these documents are available online at www.historicenvironment.scot/heps.

Historic Environment Scotland's position

We do not object to the application. We have reviewed the information supplied in the addendum and note that all of the technical parameters for the project remain as in the 2018 EIA Report. There have been no changes or updates to the other environmental topics including cultural heritage and we are content that the information in the addendum does not demonstrate any change to the assessed effects on the historic environment. We are content that the additional information does not demonstrate an impact that is significant for our interests. In light of this I can confirm that Historic Environment Scotland have no additional comments to add to our previous response to the EIA Report dated 04 October 2018.

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

Please contact us if you have any questions about this response. The officer managing this case is Victoria Clements who can be contacted by phone on 0131 668 8730 or by email on Victoria.Clements@hes.scot.

Yours sincerely

Historic Environment Scotland

Lees E (Emma)

From: Helen Croxson <Helen.Croxson@mcga.gov.uk>
Sent: 06 June 2019 20:49
To: MS LOT Seagreen Phase One Representations
Cc: Nick Salter
Subject: RE: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation Response by 08/07/19

Hannah,

Thank you for your email. On the understanding that this addendum solely relates to ornithology, and that all other aspects remain as per the information provided within the EIA Report for the consent application, the MCA would have no comments to make with regards to the safety of navigation and/or search and rescue capability, on this occasion.

Kind regards

Helen



Helen Croxson, Offshore Renewables Advisor
Navigation Safety Branch, Bay 2/25
Maritime & Coastguard Agency
Spring Place, 105 Commercial Road, Southampton, SO15 1EG
Tel: 0203 8172426
Mobile: 07468353062
Email: Helen.Croxson@mcga.gov.uk

Please note I currently work Tuesdays, Wednesdays and Thursdays.

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 27 May 2019 11:31
To: planning@angus.gov.uk; development.management@dundeecity.gov.uk; policy&projects@eastlothian.gov.uk; development.central@fife.gov.uk; prs@scotborders.gov.uk; planning.perth@sepa.org.uk; MARINEENERGY@nature.scot; planning.scotland@rspb.org.uk; hmconsultations@hes.scot; navigation safety <navigationsafety@mcga.gov.uk>; navigation@nlb.org.uk
Cc: Jessica.Drew@gov.scot; Emma.Lees@gov.scot
Subject: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation Response by 08/07/19

Dear Sir/Madam,

ELECTRICITY ACT 1989 (AS AMENDED)

MARINE (SCOTLAND) ACT 2010

MARINE AND COASTAL ACCESS ACT 2009

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

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

T: +44 (0)131 244 2500
E: MSS_Advice@gov.scot

Emma Lees
Licensing Operations Team
Marine Scotland
375 Victoria Road
Aberdeen
AB11 9DB

MSS ADVICE ON SEAGREEN ORNITHOLOGY ADDENDUM AND CONSULTATION RESPONSES FROM RSPB AND SNH

Marine Scotland Science has reviewed the submitted addendum and has provided the following comments.

Seagreen submitted an addendum to their 2018 application including revised EIA (Addendum – Section 2) and HRA (Addendum – Section 3) for ornithology assessment. The Addendum (as did the 2018 application) considers both Project Alpha and Project Bravo alone and Project Alpha and Project Bravo combined. These are considered in isolation and in combination with other wind farm and infrastructure projects. MSS have reviewed the submitted Addendum together with consultation responses from RSPB (dated 8th July 2019) and SNH (dated 5th July 2019).

The scope of the Addendum follows that advised in correspondence from SNH and MSS following the 2018 Seagreen Application and as advised during teleconferences held with SNH, MSS, and MS-LOT held by Seagreen during the development of the Addendum (summarised in Annex 5 to Addendum Part 2 and in Chapter 2 of the Addendum – section 2: Consultation). The Addendum is clearly set out with a clear explanation of what aspects of the 2018 assessment has been updated (Addendum – Part 2, section 1, chapter 1 'Introduction and consultation'), including where relevant ornithology technical appendices have been updated (Table 1-1 in Addendum – Part 2, section 1). Where the existing 2018 Environmental Impact Assessment Report (EIAR) has not been superseded by the Addendum (e.g. assessment of herring gull) where information is presented in the EIAR is summarised (Addendum, Part 2 – section 5 – annex 6). There are a couple of aspects of the Addendum where it would be useful for the Developer to provide clarification, these are emphasised in bold in the text below.

SNH state that the Addendum follows methods advised by guidance from SNH and Marine Scotland and that the assessment is to a high standard. SNH advise that the Development alone and the Development in combination with the recently consented Inch Cape (2018) and Neart na Gaoithe (2018) will not lead to any adverse impacts on site integrity for any of the SPAs under consideration. However, for the Development in combination with the earlier consented Forth and Tay projects, Inch Cape (2014) and Neart na Gaoithe (2014), SNH state that there could be an adverse impact on site integrity for gannet from Forth Islands SPA and for kittiwake from both Forth Islands SPA and from Fowlsheugh SPA. SNH reached these conclusions from the ratio of the impacted to the unimpacted populations (also known as the counter-factual of population size) predicted through population viability analyses (PVA). The use of this PVA metric is supported by the RSPB in their response. The PVA values cited by SNH for kittiwake are for collision alone (i.e. excluding displacement impact).

SNH requested that conditions are applied to any consent to address all aspects of environment monitoring and management and that when consented projects are built out the predicted impacts are assessed through robust post-consent monitoring. MSS support these suggestions, recognising the role of post-consent monitoring in validating assessments and the contribution that post-consent studies can contribute to informing the assessment of future developments.

RSPB object to the Development stating that their reasons remain as for their response to the 2018 application (consultation response dated 8th November 2018). In common with SNH the objection is for the Development in combination with other consented projects, RSPB to do not state specifically whether this is considering the 2014 or 2017 designs for Neart na Gaoithe or Inch Cape. RSPB also discuss sources of uncertainty in the assessment of collision risk stating that they would expect a high level of precaution to be applied in to this assessment.

In the Addendum EIA chapter (Addendum part 2, section 2, paragraph 42) it is stated that assessment of displacement effects on kittiwake during the non-breeding season was not required by the 2017 Scoping Opinion, thus this is not included in the Addendum. However, the Scoping Opinion (paragraph 9.3.8) requested qualitative assessment of non-breeding season displacement effects for kittiwake. The EIAR does include consideration of displacement impacts on kittiwake during the non-breeding season (paragraphs 8.508-8.513) with quantitative assessment of displacement using the matrix approach with the displacement rate (30%) and mortality rate (2%) as advised in the Scoping Opinion for the breeding period. The assessment of displacement during the non-breeding period for kittiwake in the EIAR does provide a basis for a qualitative assessment of this impact. The Addendum (Table 1-1 in Addendum – Part 2 – Section 1) states that the earlier EIAR displacement technical appendix (EIA Appendix 8C) is superseded by the Addendum. **It would be helpful for the Developer to confirm how they would suggest displacement of kittiwake during the non-breeding season should be assessed.**

The non-technical summary gives the distance between blade tip and sea surface relative to Lowest Astronomical Tide (LAT), stating this is the 'minimum blade tip clearance' (Part 1 (Non Technical summary), paragraph 34). The highest astronomical tide (HAT) should be used to calculate minimum blade tip clearance. From the technical appendix (see Table 9 in Appendix 8B to EIAR, reissued as Annex 2 to the Addendum), it appears that the distance between the blade tip and mean sea level (MSL) has been used in the CRM modelling. This is appropriate when a tidal offset is not applied, the purpose of the tidal offset is to adjust from HAT to MSL (see Band 2012)¹. A tidal offset does not appear to have been applied in the CRM modelling in the CRM appendix which is appropriate when MSL has been used. However, in the Addendum (Part 2, section 2, EIA, paragraph 66) it is stated that the collision numbers were recalculated for Neart na Gaoithe to include a tidal offset. This would be appropriate if height is relative to HAT but would underestimate collisions were heights relative to MWL. **It would be useful for Seagreen to provide clarification on whether tidal offsets were used in any of the CRMs and on whether heights were relative to MWL or HAT.**

Hopefully these comments are helpful to you. If you wish to discuss any matters further contact the REEA Advice in-box at MSS_Advice@gov.scot.

Yours sincerely

Paul Stainer

Marine Scotland Science

17 July 2019

¹ Band, B. (2012). Using a Collision Risk Model to Assess Bird Collision Risks for Offshore Wind Farms. Report by British Trust for Ornithology (BTO), Bureau Waardenburg bv, and University of St Andrews. pp 62. https://www.bto.org/sites/default/files/u28/downloads/Projects/Final_Report_SOSS02_Band1ModelGuidance.pdf

Lees E (Emma)

From: Adam Lewis <adaml@nlb.org.uk> on behalf of navigation <navigation@nlb.org.uk>
Sent: 30 May 2019 11:29
To: MS Marine Renewables
Subject: RE: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation Response by 08/07/19

Good morning,

NLB have no comment to make regarding the below addendum of additional information.

Regards

Adam

Official - Northern Lighthouse Board Email

Adam Lewis
Coastal Inspector

Navigation Department
84 George Street, Edinburgh, EH2 3DA
0131 4733197 / [Redacted]
adaml@nlb.org.uk

www.nlb.org.uk

Follow NLB on:



From: MS.MarineRenewables@gov.scot [mailto:MS.MarineRenewables@gov.scot]
Sent: 27 May 2019 11:31
To: planning@angus.gov.uk; development.management@dundeecity.gov.uk; policy&projects@eastlothian.gov.uk; development.central@fife.gov.uk; prs@scotborders.gov.uk; planning.perth@sepa.org.uk; MARINEENERGY@nature.scot; planning.scotland@rspb.org.uk; hmconsultations@hes.scot; navigationsafety@mcga.gov.uk; navigation
Cc: Jessica.Drew@gov.scot; Emma.Lees@gov.scot
Subject: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation Response by 08/07/19

Dear Sir/Madam,

ELECTRICITY ACT 1989 (AS AMENDED)

MARINE (SCOTLAND) ACT 2010

MARINE AND COASTAL ACCESS ACT 2009

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

Hannah Duffin
Marine Licensing Support Officer
Marine Scotland Licensing Operations Team
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

8th July 2019

Dear Ms Duffin,

ADDENDUM OF ADDITIONAL INFORMATION IN SUPPORT OF THE APPLICATION TO CONSTRUCT AND OPERATE THE OPTIMISED SEAGREEN OFFSHORE WIND PROJECT

Thank you for consulting with us on the additional information provided in support of Seagreen's optimised project. The application is for Project Alpha and Project Bravo offshore wind farms at 70 turbines each or a combined project totalling 120 turbines. Our position remains unchanged and RSPB Scotland continue to object to the application including either Alpha and Bravo or the combined project. The reasons for our objection have already been stated in our previous response to the application, see letter dated 8th November 2018. These reasons are as relevant now as they were in November 2018. The following summarises our key concerns:

- **Scale of impact:** The assessment has now been updated following the responses from Scottish Natural Heritage, Marine Scotland and RSPB Scotland to the original application in 2018. The updated predicted population level effects on seabirds remain, in our view, unacceptable and would represent an adverse effect on the integrity of the relevant Special Protection Areas, including the Forth Islands and Fowlsheugh. In some instances, the addendum predicts impacts that are greater than those presented in the 2018 assessment. Our position is based on considering this application in combination with other consented projects, specifically those in the Forth and Tay region.
- **Assessment parameters:** For both gannet and kittiwake collision risk modelling, the avoidance rates used were 98.9% ($\pm 0.2\%$) as recommended by the 2017 Scoping Opinion and current SNCB (2014) guidance. The RSPB recommend a lower rate be used for gannet during the breeding season, due to a widely acknowledged paucity of data supporting these rates for breeding gannet but we acknowledge that this approach is in accordance with current statutory guidance.

Scotland Headquarters

2 Lochside View
Edinburgh Park
Edinburgh
EH12 9DH

Tel: 0131 317 4100

Facebook: RSPBScotland

Twitter: @RSPBScotland

rspb.org.uk

Patron: Her Majesty the Queen **Chairman of Council:** Kevin Cox **President:** Miranda Krestovnikoff

Chairman, Committee for Scotland: Prof Colin Galbraith **Director, RSPB Scotland:** Anne McCall

RSPB is a registered Charity: England & Wales no 207076, Scotland no SC037654

However, the addendum also refers to Bowgen and Cook's (2018) recent review and the re-estimated avoidance rates to be used for these species based on the evidence presented by Skov et al. (2018). There are a number of limitations with this paper and our understanding is that SNCB have not changed their recommendations in light of this data.

Skov et al. (2018) was a single study at a single site, compromised by a number of factors, including attraction of birds to fishing vessels. Bowgen and Cook (2018) also highlighted that flight heights *measured* by Skov *et al.*, (2018) were higher than those *estimated* by boat based surveyors (such as those almost entirely used for the flight height distributions inputted into the CRM for this assessment) and the proportion of collisions (*pColl*) calculated by the Band model differed from the empirically derived value from Skov *et al.*, (2018), underestimating collisions by a factor of four. While this does not affect the predicted mortalities taken forward by the assessment, it does highlight the large amount of uncertainty inherent in the assessment, indicating that the predicted mortalities could be considerably higher.

In situations like this, where scientific data do not permit a complete evaluation of risk to the Natura network, the precautionary principle must be applied¹². The degree of precaution applied must be directly proportional to the degree of uncertainty, and so we would expect a high level of precaution to be applied to this assessment.

- **Metrics and interpreting impacts:** We wholly support the use of the counterfactual of population size (CPS) in assessing the risks to protected species populations. In determining the acceptability of the projects and the potential for them to impact on the conservation objectives of designated sites, the CPS is the most useful metric. Many references are made in the addendum to the projected growth of the populations. There is little certainty in these projections and yet they are repeatedly referred to in the assessment summaries for each species. The focus for interpreting impacts should be on the CPS, not whether a population is predicted to be at the same level or larger than its current level at the end of the project life. Further explanation of this point, including several supporting citations, was made in our response from November 2018.
- **Decarbonisation and biodiversity:** As referenced in Section 3, page 50, para 139, we agree that there are a multitude of factors that are driving the declining trends recorded in kittiwake populations. We also agree that decarbonisation of electricity production is required to help achieve our climate change emission reduction targets. However, action to address climate change should not be taken at any cost and in this instance the potential for offshore wind to add further additional pressure on an already declining population needs to be considered carefully. This is particularly relevant given the obligations on the Scottish Government to contribute toward the achievement of Good Environmental Status (GES). The latest UK Marine Strategy updated assessment³ concludes that marine bird populations remain at risk and there is a failure in achieving GES for this indicator.

¹ [Conservation \(Natural Habitats, &c.\) Regulations 1994](#)

² [Article 191 of the Treaty on the Functioning of the European Union](#)

³ [DEFRA. 2019. Marine Strategy part one: UK updated assessment and Good Environmental Status.](#)

As we raised in our previous letter, offshore wind projects are being granted consent in Scotland with the knowledge that substantial environmental impacts are likely. The First Minister has recently made clear that she sees biodiversity, and the need to take action on biodiversity loss, as important an issue as the challenge on climate change and that she wants Scotland to be leading the way. Many developments are now seeking to ensure that they result in a net-gain for biodiversity. It is therefore very disappointing that a responsible operator, which is set to benefit greatly from Scotland's natural marine environment, has made no such commitments as part of this application. We hope that Scottish Ministers will remain consistent with the welcome words from the First Minister when considering how to progress this application for consent.

Yours sincerely,

{SENT BY EMAIL}

Charles Nathan
Senior Conservation Planner

Lees E (Emma)

From: Planning South East <Planning.SE@SEPA.org.uk>
Sent: 27 May 2019 13:07
To: MS LOT Seagreen Phase One Representations
Subject: RE: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation Response by 08/07/19

Dear Ms Duffin

Thank you for sending this consultation to SEPA. We note that it appears to relate only to updated information in relation to ornithology assessments and as this is out with our remit we have no comments to make on this. If there is any further information relating to our interests then please reconsult us.

Also, just to note we were unable to find the additional information in the link provided below.

Regards
Stephanie

Stephanie Balman

Planning Officer

Planning Service, SEPA, Silvan House, 231 Corstorphine Road, Edinburgh, EH12 7AT

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 27 May 2019 11:31
To: planning@angus.gov.uk; development.management@dundeecity.gov.uk; policy&projects@eastlothian.gov.uk; development.central@fife.gov.uk; prs@scotborders.gov.uk; Planning South East <Planning.SE@SEPA.org.uk>; MARINEENERGY@nature.scot; planning.scotland@rspb.org.uk; hmconsultations@hes.scot; navigationsafety@mcga.gov.uk; navigation@nlb.org.uk
Cc: Jessica.Drew@gov.scot; Emma.Lees@gov.scot
Subject: Seagreen Wind Energy Limited - Addendum of Additional Information - Consultation Response by 08/07/19

Dear Sir/Madam,

ELECTRICITY ACT 1989 (AS AMENDED)

MARINE (SCOTLAND) ACT 2010

MARINE AND COASTAL ACCESS ACT 2009

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

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

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (AS AMENDED)

On 14th September 2018 Seagreen Wind Energy Limited submitted an application to the Scottish Ministers in accordance with the above legislation to construct and operate the Project Alpha Offshore Wind Farm and Project Bravo Offshore Wind Farm located approximately 27km east of the Angus coastline.

Marine Scotland
Licensing Operations Team
PO Box 101
375 Victoria Road
Aberdeen
AB11 9DB

SNH ref: CNS REN OSWF Seagreen

5 July 2019

By email only: ms.marinerenewables@gov.scot

Dear Sir/Madam,

**FORTH & TAY OFFSHORE WIND – SEAGREEN REAPPLICATION
SNH ADVICE ON EIA & HRA ADDENDUM**

This addendum provides an important update to the ornithological impact assessment for the Seagreen (Alpha and Bravo) reapplication. The methods follow the guidance from SNH and Marine Scotland, and the assessment has been carried out to a high standard.

ADVICE

On its own this application for Seagreen (Alpha and Bravo) will not lead to any adverse impacts on site integrity for any of the SPAs under consideration.

Cumulatively we advise that the 2018 Seagreen (Alpha and Bravo) application in combination with the consented Inch Cape (2018) and Nearth na Gaoithe (2018) applications will not lead to any adverse impacts on site integrity for any of the SPAs under consideration. We advise that the 2018 cumulative impacts have been substantially reduced from those previously assessed in 2014.

We have **outstanding concerns** in relation to the cumulative impacts of the 2014 design options for the Forth & Tay wind farms. In this regard, the counterfactuals of population size confirm our concerns in respect of collision mortality of gannet at the Bass Rock (Forth Islands SPA) and kittiwake at Forth Islands SPA and Fowlsheugh SPA.

Here the model outputs indicate that the impacted population of gannet is predicted to be 88.1% of the unimpacted population and for kittiwake the impacted population is predicted to be 87.4% of the unimpacted population at Forth Islands SPA and 89.5% of the unimpacted population at Fowlsheugh SPA.

Scottish Natural Heritage, Battleby, Redgorton, Perth PH1 3EW
Tel: 01738 444 177 www.nature.scot

Dualchas Nàdair na h-Alba, Battleby, Ràth a' Ghoirtein, Peairt PH1 3EW
Fòn: 01738 444 177 www.nature.scot

We advise that such levels of impact could give rise to adverse impact on site integrity and therefore **we object** to Seagreen (Alpha and Bravo) in combination with Inch Cape (2014) and Neart na Gaoithe (2014).

We have **no outstanding concerns** in respect of displacement impacts to puffin, guillemot or razorbill. The counterfactuals of population size and population growth rate would indicate that there is no impact on site integrity at any SPAs for these species.

We are unclear why the developers require to have both the 2014 and 2018 design options consented. You have indicated that until such time as the design specifications are submitted and approved, each developer could revert to their 2014 scenarios. This has implications for the current proposals, but also any subsequent expansion to the Seagreen Zone 2 or the upcoming Sectoral Plan.

We request that conditions are applied to any consent to address all aspects of environmental monitoring and management as has been done for the recent consents for Neart na Gaoithe and Inch Cape.

We also request that when consented projects are built out, the predicted impacts are properly assessed through a robust programme of post-consent monitoring. Such work is under discussion at the Forth and Tay regional advisory group on ornithology and we are party to those discussions.

Please contact Catriona.Gall@nature.scot, telephone 01738 458 665, if you wish to discuss any aspects of this letter.

Yours faithfully
[Redacted]

Nick Halfhide
Director of Sustainable Growth