

Aberdeen Airport

MacFarlane M (Marc)

From: #ABZ Safeguarding <abzsafeguard@aiaairport.com>
Sent: 27 July 2021 14:25
To: MS Marine Renewables
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Follow Up Flag: Follow up
Flag Status: Flagged

This proposal is located outwith our consultation zone. As such we have no comment to make and need not be consulted further.

Kind regards

Kirsteen

**Aberdeen International
Airport**



#ABZ Safeguarding

✉ abzsafeguard@aiaairport.com
🌐 www.aberdeenairport.com

📍 Aberdeen International Airport Limited, Dyce, Aberdeen, AB21 7DU

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From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 14 July 2021 17:20
To: MS.MarineRenewables@gov.scot
Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot
Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

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Dear Sir/Madam,

**THE ELECTRICITY ACT 1989 (AS AMENDED)
THE ELECTRICITY GENERATING STATIONS (APPLICATIONS FOR VARIATION OF
CONSENT) (SCOTLAND) REGULATIONS 2013 (AS AMENDED)**

**APPLICATION UNDER SECTION 36C OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO
VARY THE CONSENT GRANTED UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 (AS
AMENDED) TO CONSTRUCT AND OPERATE THE MORAY WEST OFFSHORE WIND FARM**

On 30 March 2021, Moray Offshore Windfarm (West) Limited (Company Number: No 10515140 ("the Applicant")) submitted an application to the Scottish Ministers, in accordance with the above legislation, for a variation to the existing section 36 consent ("s.36 consent") for the Moray West Offshore Wind Farm. The variation request is to remove reference to the maximum generation capacity of "around 850MW" and to increase the width of the rotor blades from 6 metres to 6.6

meters under the existing consented scenario to construct 72 Wind Turbine Generators. No other amendment to physical parameters of the WTGs or associated infrastructure are being sought through this amendment.

If consent is granted for the variation application, the Scottish Ministers will consider exercising their discretion to vary the marine licence granted in respect of the offshore generating station on 14 June 2019. The variation would revise the description in Paragraph 2.1 of the marine licence to reflect the changes proposed by the variation application. The marine licence can be downloaded from: <https://marine.gov.scot/data/moray-west-offshore-wind-farm-06763-marine-licence>.

The variation application documentation can be downloaded from:
<https://marine.gov.scot/ml/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth>.

If you wish to submit any representations in response to the consultation regarding the above variation application, please ensure they are submitted to the Scottish Ministers, in writing, to MS.MarineRenewables@gov.scot no later than **11 August 2021**.

If you have not responded by this date, the Marine Scotland Licensing Operations Team ("MS-LOT") will assume a 'nil return'.

MS-LOT will make your representations publicly available. Personal information will be redacted before the representations are made public. If you have any queries or concerns about how your personal data will be handled, please visit the MS-LOT [website](#) or contact MS-LOT at MS.MarineRenewables@gov.scot. Alternatively, please write to: Marine Scotland Licensing Operations Team, Marine Laboratory, 375 Victoria Road, Aberdeen AB11 9DB.

If you have any queries please do not hesitate to contact [MS-LOT](#).

Yours faithfully,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046
General Email: MS.MarineRenewables@gov.scot
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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British Telecommunications

MacFarlane M (Marc)

From: radionetworkprotection@bt.com
Sent: 06 August 2021 10:47
To: MS Marine Renewables
Cc: radionetworkprotection@bt.com; England D (Debbie); Sweeting S (Stephanie); MacFarlane M (Marc)
Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021 - WID11593
Attachments: Notification of Intention to Vary a Licence - Moray West Offshore Wind Farm - for Response by 22 September 2021 - Deb ; Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021 - Deb

Follow Up Flag: Follow up
Flag Status: Flagged



OUR REF: WID11593 / WID11585 / WID11586
Original Ref - WID10642

Dear Sir/Madam

Thank you for your email dated 19/07/2021 which provided us with the variation details for Moray West Offshore Wind Farm.

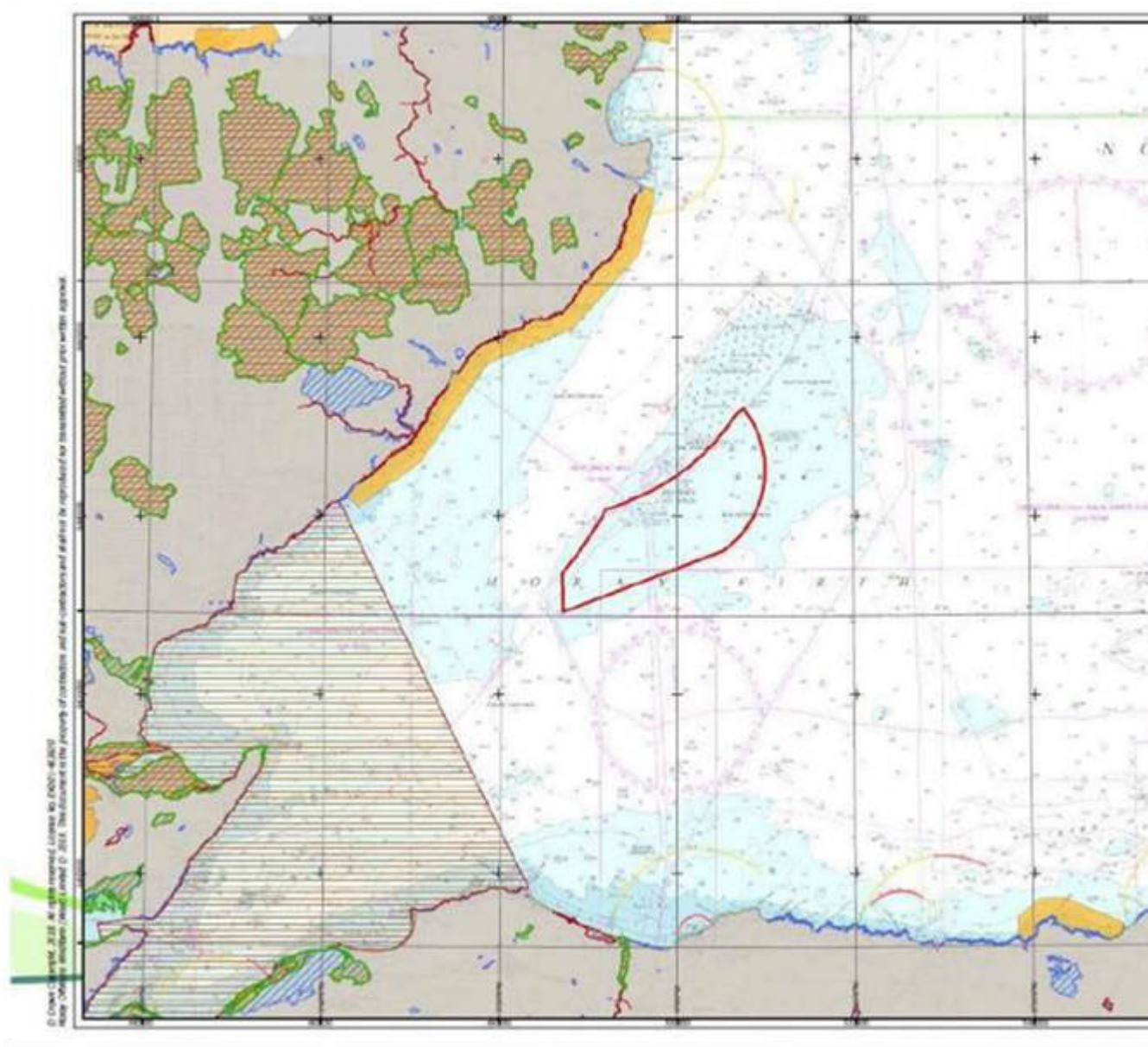
We have studied this variation link and with respect to EMC and related problems to BT point-to-point microwave radio links.

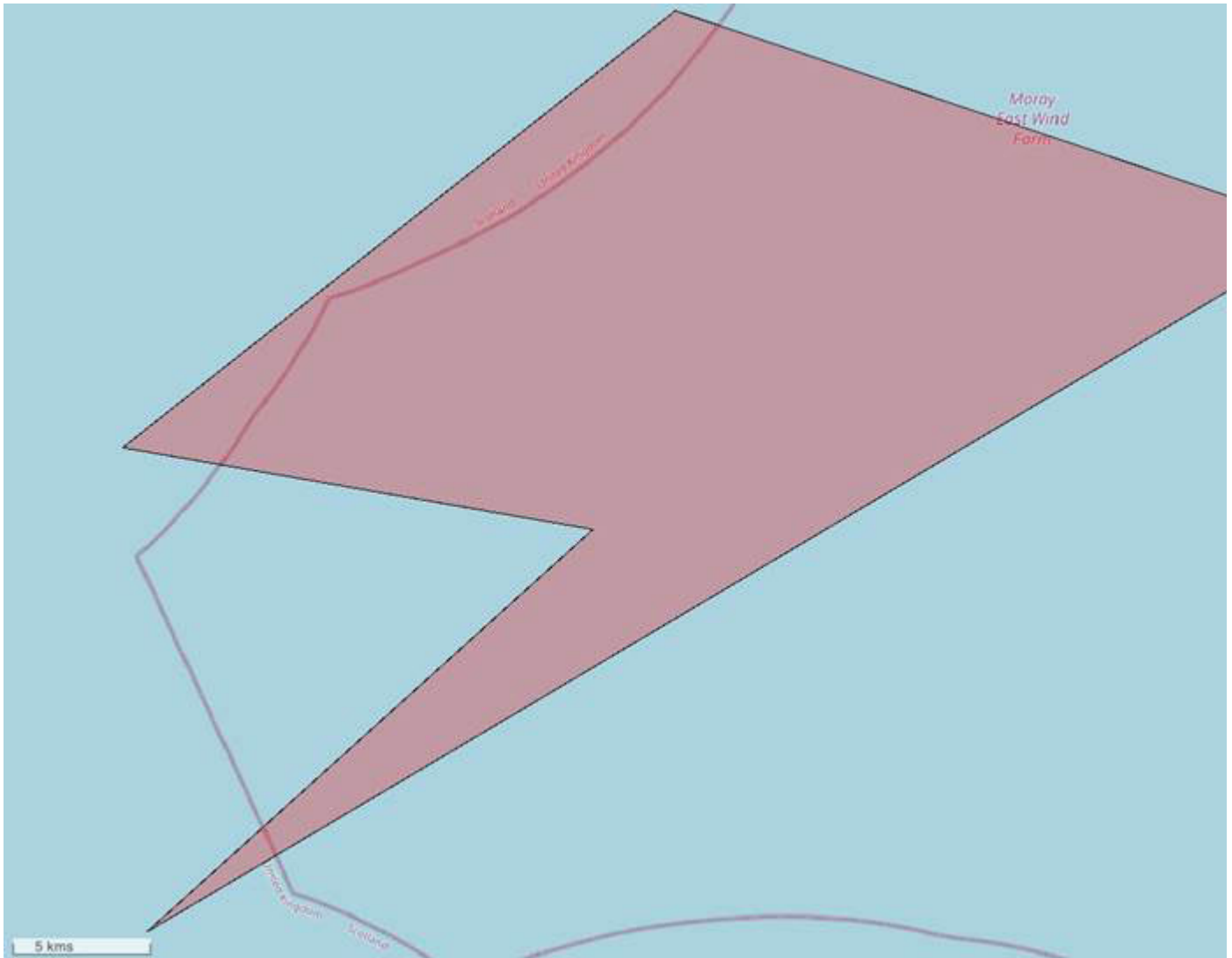
The conclusion is that, the locations proposed on the original request Ref WID10642 for the location of multiple Wind Turbines our decision remains the same that this should not cause interference to BT's current and presently planned radio network.

This was plotted originally as per Annex 1 Figure 1 therefore if there is a change to any of the original locations please provide co-ordinates and we can review this if required.

Annex 1 – Description of the Development

Figure 1 Moray West Offshore Windfarm Site





BT requires 100m minimum clearance from the Blade tip to the link path. If any of the locations change, please let us know and we can reassess this for you.

Regards

Debra Baldwin
Radio Planner
Networks - Engineering Services Radio Planning



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R/O : 81 Newgate Street, London EC1A 7AJ
Registered in England: No 1800000

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 19 July 2021 16:43
To: MS.MarineRenewables@gov.scot
Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021 - WID11593

Dear Sir/Madam,

Please see a link to additional variation information in the email below, highlighted in yellow.

Kind regards,
Marc

From: MS Marine Renewables
Sent: 14 July 2021 17:20
To: MS Marine Renewables <MS.MarineRenewables@gov.scot>
Cc: England D (Debbie) <Debbie.England@gov.scot>; Sweeting S (Stephanie) <Stephanie.Sweeting@gov.scot>; MacFarlane M (Marc) <Marc.Macfarlane@gov.scot>
Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

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<https://marine.gov.scot/data/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth-application>

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If you have any queries please do not hesitate to contact [MS-LOT](#).

Yours faithfully,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046
General Email: MS.MarineRenewables@gov.scot
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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Civil Aviation Authority

MacFarlane M (Marc)

From: Andy Wells <Andrew.Wells@caa.co.uk>
Sent: 20 July 2021 18:26
To: MS Marine Renewables
Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm

Follow Up Flag: Follow up
Flag Status: Flagged

Dear colleague,

Thank you for the opportunity to comment on the issue at subject. The CAA has no comments on the proposed application to vary Section 36 consent.

Kind regards

Andy

Andy Wells

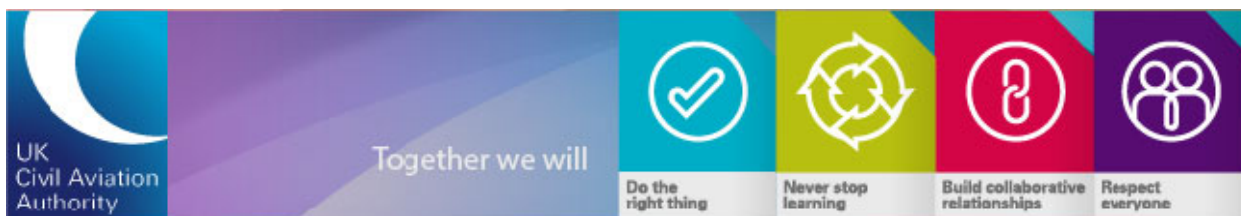
Manager Policy
Safety and Business Delivery
Civil Aviation Authority

Tel: 0330 138 3166
Mob: [Redacted]



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Historic Environment Scotland

MacFarlane M (Marc)

From: Laura Denholm <laura.denholm@hes.scot>
Sent: 03 August 2021 08:32
To: MS Marine Renewables
Subject: Moray West Offshore Wind Farm
Attachments: 20210803MorayWestVariationHESResponse.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Kind regards

Laura
Laura Denholm |Business Support Officer – Casework Technician | Heritage Directorate Historic Environment Scotland | Àrainneachd Eachdraidheil Alba Longmore House, Salisbury Place, Edinburgh, EH9 1SH
T: 0131 668 8898
E: laura.denholm@hes.scot

www.historicenvironment.scot

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20210803MorayWestVariationHESResponse

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1SH Scran Ltd – Company No. SC163518 Registered office: John Sinclair House, 16 Bernard Terrace, Edinburgh, EH8 9NX _____

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ENVIRONMENT
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By email: 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

Our case ID: 300020921

03 August 2021

Dear Marine Scotland

The Electricity Act 1989 (as amended)
The Electricity Generating Stations (Applications for Variation of Consent) (Scotland)
Regulations 2013 (as amended)

Application under Section 36C of the Electricity Act 1989 (As Amended) to vary the consent granted under Section 36 of the Electricity Act 1989 (As Amended) to construct and operate the Moray West Offshore Wind Farm

Thank you for your consultation which we received on 15 July 2021. We have considered it and its accompanying EIA Report in our role as a consultee under the terms of the above regulations and for our historic environment remit. Our remit is 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.

You should also seek advice from the relevant local authority archaeology and conservation advisors for matters including unscheduled archaeology and category B and C-listed buildings.

Our Advice

We do not object to the proposed development and have no detailed comments to offer at this stage.

We understand that the application seeks to vary the blade width of the turbines in the proposed development. No other changes to the development itself are being sought, and other changes identified are limited to varying the wording of the consent. We are content that this variation will not alter the impacts on our interests, and therefore have no comments to make on this variation application. We are content that our previous advice on impacts will remain valid.



Our comments should be treated as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object.

Our decision not to object should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

Further Information

This response applies to the application currently proposed. An amended scheme may require another consultation with us.

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes/. Technical advice is available through our Technical Conservation website at www.engineshed.org.

Please contact us if you have any questions about this response. The officer managing this case is Ruth Cameron, who can be contacted by phone on 0131 668 8657 or by email on Ruth.Cameron@hes.scot.

Yours faithfully

Historic Environment Scotland

Marine Scotland Science

MacFarlane M (Marc)

From: Wright K (Kirsty) on behalf of MSS Advice
Sent: 18 August 2021 14:24
To: MS Marine Renewables
Cc: England D (Debbie); Sweeting S (Stephanie); MacFarlane M (Marc)
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021
Attachments: 2021-15-07- Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - REEA Response Letter to MS-LOT.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Marc,

Please find attached MSS advice for the 'Application to Vary Section 36 Consent - Moray West Offshore Wind Farm'.

Kind regards,
Kirsty

From: MS Marine Renewables <MS.MarineRenewables@gov.scot>
Sent: 19 July 2021 16:43
To: MS Marine Renewables <MS.MarineRenewables@gov.scot>
Cc: England D (Debbie) <Debbie.England@gov.scot>; Sweeting S (Stephanie) <Stephanie.Sweeting@gov.scot>; MacFarlane M (Marc) <Marc.MacFarlane@gov.scot>
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Dear Sir/Madam,

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Kind regards,
Marc

From: MS Marine Renewables
Sent: 14 July 2021 17:20
To: MS Marine Renewables <MS.MarineRenewables@gov.scot>
Cc: England D (Debbie) <Debbie.England@gov.scot>; Sweeting S (Stephanie) <Stephanie.Sweeting@gov.scot>; MacFarlane M (Marc) <Marc.Macfarlane@gov.scot>
Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

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APPLICATION UNDER SECTION 36C OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO VARY THE CONSENT GRANTED UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO CONSTRUCT AND OPERATE THE MORAY WEST OFFSHORE WIND FARM

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The variation application documentation can be downloaded from: <https://marine.gov.scot/ml/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth>.

<https://marine.gov.scot/data/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth-application>

If you wish to submit any representations in response to the consultation regarding the above variation application, please ensure they are submitted to the Scottish Ministers, in writing, to MS.MarineRenewables@gov.scot no later than **11 August 2021**.

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If you have any queries please do not hesitate to contact [MS-LOT](#).

Yours faithfully,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046

General Email: MS.MarineRenewables@gov.scot

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>

Frequently
Asked
Questions

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

Debbie England
Marine Scotland Licensing Operations Team
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

18 August 2021

Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm

Marine Scotland Science has reviewed the relevant documentation and has provided the following comments.

Marine Ornithology

MSS have reviewed the Section 36 Consent Variation Application Report submitted by Moray Offshore Windfarm (West) Limited (hereafter, 'Moray West') in support of their application to vary their existing Section 36 Consent, the consultation response from NatureScot (NS, dated 10th August 2021), and have also considered the documents submitted in support of the original s36 licence application, specifically considering those presenting the collision risk modelling calculations (Moray Offshore Windfarm (West) Limited –EIA Report Volume-Technical Appendices Combined- Collision Risk Modelling (CRM)- Appendix 10.2)¹, the Screening Request Report regarding the blade width and generating capacity alteration²

The Variation Application Report seeks to increase the blade width of the Wind Turbine Generators (WTGs) under the 72 turbine scenario from 6m to 6.6m. Moray West present in this report comparative modelling of avian collisions based on the change requested, with parameters displayed in Table 3.2: 'Turbine Parameters Used for Collision Risk Modelling (CRM) in the 2018 Application and CRM to inform this Consent Variation Screening Report'. Results are provided indicating no increase (and generally a small decrease) in estimated impacts both alone and cumulatively.

Based on the evidence provided, MSS agree with NS that the requested change does not contravene the worst case scenario (WCS) assumptions used in assessment.

However, although comparative analysis has been undertaken to allow us to compare the physical parameter change in the blade width, operational parameters such as rotor speed, pitch and percentage time operational (which are parameters in collision risk modelling) have remained unchanged. MSS recommend that with respect to the increase in maximum energy generation, clarification should be sought as to whether any operational change in the WTGs is required to achieve any new limit suggested and how this might impact, subsequently, the assumptions made in the WCS assessment.

¹ [Moray West Offshore Windfarm - Environmental Impact Assessment report | Marine Scotland Information](#)

² [Screening Request - Blade Width Increase and Generating Capacity Alteration - Moray West Offshore Windfarm | Marine Scotland Information](#)

Marine Mammals

MSS have reviewed the application and are content with the proposed variation, providing that maximum hammer energy for piling remains within the levels included in the consent decision.

Marine fish ecology

MSS have reviewed the application and have no comments.

Commercial fisheries

MSS have reviewed the application and have no comments.

Diadromous fish

MSS have reviewed the application and are content with the proposed variation, providing that maximum hammer energy for piling remains within the levels included in the consent decision.

Benthic Ecology

MSS have no comments regarding this variation.

Physical environment / coastal processes

MSS have reviewed the application and have no comments regarding physical environment and coastal processes.

Aquaculture

The proposed variation to the planning consent; increasing the size of the rotor blades and removing limitation on maximum energy generation capacity is not expected to impact aquaculture animal health.

We hope that these comments are helpful to you. If you wish to discuss any matters further then please contact the REEA Advice inbox at MSS_Advice@gov.scot

Yours sincerely,

Renewable Energy Environmental Advice group

Marine Scotland Science



Maritime and Coastguard Agency

MacFarlane M (Marc)

From: Nick Salter <Nick.Salter@mcga.gov.uk>
Sent: 03 August 2021 13:48
To: MS Marine Renewables
Cc: Matthew Macintosh; Pete Lowson
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021 [UNSCANNED]

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Marc,

I can confirm we have no objections to the licence variation to increase the capacity and rotor blades. Agreement of the layout design is under discussion and we would expect the variation to be accounted for in future designs presented to MCA.

Best regards,

Nick

Nick Salter
Offshore Renewables Lead
Marine Licensing and Consenting
UK Technical Services Navigation

+44 (0) 20 3817 2554
[Redacted]
nick.salter@mcga.gov.uk



Maritime & Coastguard Agency
c/o Falmouth Marine Office
Pendennis Point
Castle Drive, Falmouth
Cornwall, TR11 4WZ



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www.gov.uk/mca

From: navigation safety <navigationsafety@mcga.gov.uk>
Sent: 20 July 2021 09:46
To: Nick Salter <Nick.Salter@mcga.gov.uk>; Matthew Macintosh <Matthew.Macintosh@mcga.gov.uk>
Subject: FW: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Nick Salter
Offshore Renewables Lead
Marine Licensing and Consenting
UK Technical Services Navigation

+44 (0) 20 3817 2554
[Redacted]
nick.salter@mcga.gov.uk



Maritime & Coastguard Agency

c/o Falmouth Marine Office
Pendennis Point
Castle Drive, Falmouth
Cornwall, TR11 4WZ



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www.gov.uk/mca

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Sent: 14 July 2021 17:20

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Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot

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VARY THE CONSENT GRANTED UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 (AS
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On 30 March 2021, Moray Offshore Windfarm (West) Limited (Company Number: No 10515140 ("the Applicant")) submitted an application to the Scottish Ministers, in accordance with the above legislation, for a variation to the existing section 36 consent ("s.36 consent") for the Moray West Offshore Wind Farm. The variation request is to remove reference to the maximum generation capacity of "around 850MW" and to increase the width of the rotor blades from 6 metres to 6.6 meters under the existing consented scenario to construct 72 Wind Turbine Generators. No other amendment to physical parameters of the WTGs or associated infrastructure are being sought through this amendment.

If consent is granted for the variation application, the Scottish Ministers will consider exercising their discretion to vary the marine licence granted in respect of the offshore generating station on 14 June 2019. The variation would revise the description in Paragraph 2.1 of the marine licence to reflect the changes proposed by the variation application. The marine licence can be downloaded from: <https://marine.gov.scot/data/moray-west-offshore-wind-farm-06763-marine-licence>.

The variation application documentation can be downloaded from:

<https://marine.gov.scot/ml/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth>.

If you wish to submit any representations in response to the consultation regarding the above variation application, please ensure they are submitted to the Scottish Ministers, in writing, to MS.MarineRenewables@gov.scot no later than **11 August 2021**.

If you have not responded by this date, the Marine Scotland Licensing Operations Team ("MS-LOT") will assume a 'nil return'.

MS-LOT will make your representations publicly available. Personal information will be redacted before the representations are made public. If you have any queries or concerns about how your personal data will be handled, please visit the MS-LOT [website](#) or contact MS-LOT at MS.MarineRenewables@gov.scot. Alternatively, please write to: Marine Scotland Licensing Operations Team, Marine Laboratory, 375 Victoria Road, Aberdeen AB11 9DB.

If you have any queries please do not hesitate to contact [MS-LOT](#).

Yours faithfully,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046
General Email: MS.MarineRenewables@gov.scot
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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Ministry of Defence

MacFarlane M (Marc)

From: Oulaghan, Teena C2 (DIO Estates-SafegdgMgr1) <Teena.Oulaghan100@mod.gov.uk>
Sent: 09 August 2021 11:53
To: MS Marine Renewables
Subject: 20210809_MOD_Response_Letter_S36C_Moray_West
Attachments: 20210809_MOD_Response_Letter.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning

please find attached MOD response to recent consultation for Variation of Consent.

kindest regards

Teena Oulaghan

Safeguarding Manager
Estates – Safeguarding

Due to covid-19 I am working from home until further notice.

In line with the latest guidance, I am working offline where possible to ease the pressure on the IT network, so I will only be checking emails and Skype periodically. This means I might not respond as promptly as usual, so if you need my attention more urgently, please call me on [REDACTED].

**Defence
Infrastructure
Organisation**

St George's House , DIO Headquarters, DMS Whittington, Lichfield, Staffordshire, WS14 9PY.

Mobile Tel: [Redacted] .

Website: www.gov.uk/dio/ | **Twitter:** @mod_dio

Read DIO's blog: <https://insidedio.blog.gov.uk/>





Defence Infrastructure Organisation

Teena Oulaghan
Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Your Reference: S36C

Telephone [MOD]: [Redacted]

Our Reference: DIO10036435

E-mail: teena.oulaghan100@mod.gov.uk

Marine Scotland Licensing Operations Team,
Marine Laboratory,
375 Victoria Road,
Aberdeen.
AB11 9DB.

09th August 2021

Dear Sir / Madam,

**THE ELECTRICITY ACT 1989 (AS AMENDED)
THE ELECTRICITY GENERATING STATIONS (APPLICATIONS FOR VARIATION OF CONSENT)
(SCOTLAND) REGULATIONS 2013 (AS AMENDED).**

**APPLICATION UNDER SECTION 36C OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO VARY THE
CONSENT GRANTED UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO
CONSTRUCT AND OPERATE THE MORAY WEST OFFSHORE WIND FARM.**

Thank you for consulting the Ministry of Defence (MOD) on the above Section 36C application to vary consent granted to construct and operate the Moray West Offshore Wind Farm received by this office on 14th July 2021.

I write to confirm the safeguarding position of the MOD regarding this variation application.

The variation request is to remove reference to the maximum generation capacity of "around 850MW" and to increase the maximum width of the rotor blades from 6 metres to 6.6 meters under the existing consented scenario to construct 72 Wind Turbine Generators (WTGs). No other amendment to physical parameters of the WTGs or associated infrastructure are being sought through this amendment.

After reviewing this submission, I can confirm that the MOD has, on the basis that those conditions applied to the Section 36 consent dated 14 June 2019 to address the impacts the scheme will have upon MOD Air Traffic Control (ATC) radar (condition 21), and aviation safety (installation of appropriate aviation lighting (condition 20) and requirement for submission of data for charting (conditions 22 and 24)) are replicated on any new consent, no objection to this proposal.

For ease of reference the relevant conditions are included in, Annex 1 below.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely
[Redacted]

Miss Teena Oulaghan
Safeguarding Manager

Enc. Annex A

Annex 1

Aviation Radar

The Air Traffic Control Radar Mitigation Scheme is a scheme designed to mitigate the impact of the development upon air traffic control operations of the Ministry of Defence (MOD) which are reliant upon the Primary Surveillance Radar at RAF Lossiemouth ("the radar"). The approved Air Traffic Control Radar Mitigation Scheme shall be in place for the operational life of the development provided the Radar remains in operation

No wind turbine shall be permitted to rotate its rotor blades on its horizontal axis unless and until all those measures required by the approved Air Traffic Control Radar Mitigation Scheme to be implemented prior to any wind turbine being permitted to rotate its rotor blades on its horizontal axis have been implemented. The development shall thereafter be operated fully in accordance with the approved Air Traffic Control Radar Mitigation Scheme.

Lighting and Marking Plan

The Company must, no later than six months prior to the Commencement of the Development, submit a Lighting and Marking Plan ("LMP"), in writing, to the Scottish Ministers for their written approval. Such approval may only be granted following consultation by the Scottish Ministers with (national consultees defined by MSLOT), CAA, MOD, (relevant local authorities as defined by MSLOT) and any such other advisors or organisations as may be required at the discretion of the Scottish Ministers. The LMP must provide that the Development be lit and marked in accordance with the approved LMP that shall comply with the current CAA and MOD aviation lighting policy and guidance that is in place as at the date of the Scottish Ministers approval of the LMP, or any such other documents that may supersede this guidance prior to the approval of the LMP. The LMP must also detail the navigational lighting requirements detailed in the International Association of Marine Aids to Navigation and Lighthouse Authorities ("IALA") Recommendation O-139 or any other documents that may supersede this guidance prior to approval of the LMP.

MOD Notification

The Company must notify the Ministry of Defence (MOD), at least 14 days prior to the commencement of the offshore works, in writing of the following information:

- (a) The earliest date of the commencement of construction off the offshore works;
- (b) The earliest date any wind turbine generators are bought in to use;
- (c) The maximum height of any construction equipment 50 metres or greater in height above Mean Sea Level, to be used; and
- (d) The maximum heights of any wind turbine generator, offshore platforms or other, temporary or permanent, offshore structures 50 metres or greater in height, above Mean Sea Level, to be deployed or constructed.

Charting Requirement

The company must, prior to the commencement of the development, and following submission of the DSLP to Scottish Ministers (refer to condition 12), provide the positions and maximum heights of the wind turbine generators (WTGs), any offshore substation platforms (OSPs) and construction equipment to the United Kingdom Hydrographic Office (UKHO), the Ministry of Defence (MOD) and Defence Graphic Centre for Aviation and Nautical charting purposes. The company must, within one month of the final commissioning of the development, provide coordinates accurate to three decimal places of minutes of arcs for each WTG and OSP, position and maximum heights of the WTGs and OSPs to the UKHO, the MOD and Defence Geographic Centre for aviation and nautical charting purposes.

NatureScot

MacFarlane M (Marc)

From: Chris Eastham <Chris.Eastham@nature.scot>
Sent: 10 August 2021 12:08
To: MS Marine Renewables
Cc: England D (Debbie); Sweeting S (Stephanie); MacFarlane M (Marc)
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Marc,

Thank you for the consultation regarding the variation request to the Section 36 consent for the Moray West offshore wind farm.

The variation request is for:

- the requirement to increase the blade width of Wind Turbine Generators (WTGs) specified in the Section 36 Consent – Annex 1 under the 72 turbine scenario from 6 m to 6.6 m; and
- the request for removal of reference to Moray West having a ‘maximum generating capacity of around 850 MW’.

Having reviewed the supporting information we have no major comments. We note that the revised collision risk estimates for the four species (kittiwake, great black-backed gull, herring gull and gannet) are lower than those used to support the Moray West Offshore Wind Farm application and the consent decision reached by Scottish Ministers. We agree, therefore, that the conclusions reached by Moray West and Scottish Ministers remain valid.

Kind regards

Chris

Dr Chris Eastham | Marine Sustainability Advisor

NatureScot | Battleby, Redgorton, Perth PH1 3EW | [Redacted]

nature.scot | @nature_scot | Scotland's Nature Agency | Buidheann Nàdair na h-Alba

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 19 July 2021 16:43
To: MS.MarineRenewables@gov.scot
Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Dear Sir/Madam,

Please see a link to additional variation information in the email below, highlighted in yellow.

Kind regards,
Marc

From: MS Marine Renewables
Sent: 14 July 2021 17:20
To: MS Marine Renewables
Cc: England D (Debbie) ; Sweeting S (Stephanie) ; MacFarlane M (Marc)
Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Dear Sir/Madam,

**THE ELECTRICITY ACT 1989 (AS AMENDED)
THE ELECTRICITY GENERATING STATIONS (APPLICATIONS FOR VARIATION OF CONSENT) (SCOTLAND)
REGULATIONS 2013 (AS AMENDED)**

**APPLICATION UNDER SECTION 36C OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO VARY THE CONSENT
GRANTED UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO CONSTRUCT AND OPERATE THE
MORAY WEST OFFSHORE WIND FARM**

On 30 March 2021, Moray Offshore Windfarm (West) Limited (Company Number: No 10515140 ("the Applicant")) submitted an application to the Scottish Ministers, in accordance with the above legislation, for a variation to the existing section 36 consent ("s.36 consent") for the Moray West Offshore Wind Farm. The variation request is to remove reference to the maximum generation capacity of "around 850MW" and to increase the width of the rotor blades from 6 metres to 6.6 meters under the existing consented scenario to construct 72 Wind Turbine Generators. No other amendment to physical parameters of the WTGs or associated infrastructure are being sought through this amendment.

If consent is granted for the variation application, the Scottish Ministers will consider exercising their discretion to vary the marine licence granted in respect of the offshore generating station on 14 June 2019. The variation would revise the description in Paragraph 2.1 of the marine licence to reflect the changes proposed by the variation application. The marine licence can be downloaded from: <https://marine.gov.scot/data/moray-west-offshore-wind-farm-06763-marine-licence>.

The variation application documentation can be downloaded from: <https://marine.gov.scot/ml/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth>.

<https://marine.gov.scot/data/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth-application>

If you wish to submit any representations in response to the consultation regarding the above variation application, please ensure they are submitted to the Scottish Ministers, in writing, to MS.MarineRenewables@gov.scot no later than **11 August 2021**.

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If you have any queries please do not hesitate to contact [MS-LOT](#).

Yours faithfully,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046

General Email: MS.MarineRenewables@gov.scot

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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NatureScot is the operating name of Scottish Natural Heritage.

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Tha am post-dealain seo agus fiosrachadh sam bith na chois dìomhair agus airson an neach no buidheann ainmichte a-mhàin. Mas e gun d' fhuair sibh am post-dealain seo le mearachd, cuiribh fios dhan manaidshear-siostaim no neach-sgrìobhaidh.

Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho NatureScot.

North and East Coast Regional Inshore Fisheries Group

MacFarlane M (Marc)

From: Jennifer Mouat <jenny.mouat@btinternet.com>
Sent: 09 August 2021 19:58
To: MS Marine Renewables
Subject: Moray West Offshore Wind Farm Section 36 Consent Variation Request

Follow Up Flag: Follow up
Flag Status: Flagged

Good evening

Moray West Offshore Wind Farm Section 36 Consent Variation Request

The proposed amendments included in the variation request are:

- Request to increase the blade width of Wind Turbine Generators (WTGs) specified in the Section 36 Consent – Section 1.5 and Annex 1 under the 72 turbine scenario (maximum tip height of 265 m and maximum rotor diameter of 230 m) from 6 m to 6.6 m;
- Request for removal of reference to Moray West having a ‘maximum generating capacity of around 850 MW’; and
- Consequential changes to Section 1.5, Annex 1: Description of the Development and the definition of the application in Annex 2: Section 36 Consent Conditions – Definitions and Glossary of Terms as presented in Annex A of this letter and the accompanying Section 36 Consent Variation Report (Document Reference: 8460005-DBI01-MWW-CLP-000002 – Appendix A)

We have no comment to make on Bullet 1.

There is concern, however, with the request for removal of reference to Moray West having a maximum generating capacity of round 850 MW. The consent letter from Marine Scotland dated 14th Jun 2019 stated that:

1. 1.5 The Application is for the construction and operation of an offshore energy generating station. **within a maximum generating capacity of around 850 megawatts (“MW”).**

It is our understanding that the grid connection for this development is 860 MW which appears to be in consistent with the generation of 850 MW. The Variation Application does not make clear the rationale for the variation request and any impact on the grid connection. We would like to see clarification of what the impact of the increased flexibility in generation capacity would mean in real terms and how this will further impact the commercial fishing industry.

Until such time as the above is clarified the members of the North & East Coast Regional Inshore Fishery Group object to the variation request.

Jennifer Mouat, MA (EPS), Bsc Hon, PG Dip EDM
The Aegir Consultancy Limited

Email - jenny.mouat@btinternet.com

Mobile - [Redacted]

Northern Lighthouse Board

MacFarlane M (Marc)

From: Gillian Burns <Gillian.Burns@nlb.org.uk>
Sent: 23 July 2021 15:05
To: MS Marine Renewables
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021
Attachments: O6_04_689 - Response.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Marc,

Please see the attached response from the Northern Lighthouse Board Ref : Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm.

If any further information is required please get in touch.

Best wishes,

Gillian

Official - Northern Lighthouse Board Email

Gillian Burns

Navigation Officer

NLB Navigation, 84 George Street, Edinburgh, EH2 3DA
0131 473 2431 / [Redacted]

Gillian.Burns@nlb.org.uk

www.nlb.org.uk



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Our values: Safety, Pride, Integrity, Teamwork, Fairness, Innovation, Respect, Environment

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From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>

Sent: 14 July 2021 17:20

To: MS.MarineRenewables@gov.scot

Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot

Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Dear Sir/Madam,

**THE ELECTRICITY ACT 1989 (AS AMENDED)
THE ELECTRICITY GENERATING STATIONS (APPLICATIONS FOR VARIATION OF
CONSENT) (SCOTLAND) REGULATIONS 2013 (AS AMENDED)**

**APPLICATION UNDER SECTION 36C OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO
VARY THE CONSENT GRANTED UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 (AS
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If consent is granted for the variation application, the Scottish Ministers will consider exercising their discretion to vary the marine licence granted in respect of the offshore generating station on 14 June 2019. The variation would revise the description in Paragraph 2.1 of the marine licence to reflect the changes proposed by the variation application. The marine licence can be downloaded from: <https://marine.gov.scot/data/moray-west-offshore-wind-farm-06763-marine-licence>.

The variation application documentation can be downloaded from:
<https://marine.gov.scot/ml/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth>.

If you wish to submit any representations in response to the consultation regarding the above variation application, please ensure they are submitted to the Scottish Ministers, in writing, to MS.MarineRenewables@gov.scot no later than **11 August 2021**.

If you have not responded by this date, the Marine Scotland Licensing Operations Team ("MS-LOT") will assume a 'nil return'.

MS-LOT will make your representations publicly available. Personal information will be redacted before the representations are made public. If you have any queries or concerns about how your personal data will be handled, please visit the MS-LOT [website](#) or contact MS-LOT at MS.MarineRenewables@gov.scot. Alternatively, please write to: Marine Scotland Licensing Operations Team, Marine Laboratory, 375 Victoria Road, Aberdeen AB11 9DB.

If you have any queries please do not hesitate to contact [MS-LOT](#).

Yours faithfully,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046
General Email: MS.MarineRenewables@gov.scot
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>

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Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: 0131 473 3100
Fax: 0131 220 2093

Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: Moray West S36 Variation – July 2021
Our Ref: GB/OPS/ML/O6_04_689

Mr Marc MacFarlane
Licensing Casework Officer
Marine Scotland – Marine Planning and Policy
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

19 July 2021

THE ELECTRICITY ACT 1989 (AS AMENDED)
THE ELECTRICITY GENERATING STATIONS (APPLICATIONS FOR VARIATION OF CONSENT) (SCOTLAND)
REGULATIONS 2013 (AS AMENDED)

Application Under Section 36C Of The Electricity Act 1989 (As Amended) To Vary The Consent Granted Under Section 36C Of The Electricity Act 1989 (As Amended) To Construct And Operate The Moray West Offshore Wind Farm

Thank you for your e-mail correspondence dated 14th July 2021 relating to the application submitted by **Moray Offshore Windfarm (West) Limited** for a variation to the Section 36 Consent granted for the construction and operation of the Moray Offshore Windfarm (West) Offshore Windfarm, within the Moray Firth.

We note that the variation request is for an increase in the width of the rotor blades (from 6.0 metres to 6.6 metres) and to remove reference to the maximum generation capacity of “around 850MW” under the existing consented scenario to construct 72 Wind Turbine Generators.

Northern Lighthouse Board have no objection to the proposed Section 36 variation.

Yours sincerely
[Redacted]

Peter Douglas
Navigation Manager

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To find out more, please see our Privacy Notice at www.nlb.org.uk/legal-notice/

Royal Society for the Protection of Birds

MacFarlane M (Marc)

From: planning, scotland <scotland.planning@rspb.org.uk>
Sent: 06 August 2021 10:47
To: MS Marine Renewables
Cc: England D (Debbie); Sweeting S (Stephanie); MacFarlane M (Marc)
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021
Attachments: S36C RSPB Response MWOWF.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good Morning,

Please find attached our comments on the application to vary Section 36 consent for MWOWF

If you have any queries please do not hesitate to contact me.

Best wishes,

Catherine

Catherine Kelham

Senior Marine Conservation Planner

Scotland Headquarters 2 Lochside View, Edinburgh Park, Edinburgh, EH12 9DH

Tel 0131 317 4100

Mobile [Redacted]

rspb.org.uk

Let's give nature a home in Scotland



RSPB Scotland is part of the RSPB, the UK's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 19 July 2021 16:43
To: MS.MarineRenewables@gov.scot

Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot

Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Dear Sir/Madam,

Please see a link to additional variation information in the email below, highlighted in yellow.

Kind regards,
Marc

From: MS Marine Renewables

Sent: 14 July 2021 17:20

To: MS Marine Renewables <MS.MarineRenewables@gov.scot>

Cc: England D (Debbie) <Debbie.England@gov.scot>; Sweeting S (Stephanie) <Stephanie.Sweeting@gov.scot>; MacFarlane M (Marc) <Marc.Macfarlane@gov.scot>

Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Dear Sir/Madam,

**THE ELECTRICITY ACT 1989 (AS AMENDED)
THE ELECTRICITY GENERATING STATIONS (APPLICATIONS FOR VARIATION OF
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<https://marine.gov.scot/data/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth-application>

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If you have any queries please do not hesitate to contact [MS-LOT](#).

Yours faithfully,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046
General Email: MS.MarineRenewables@gov.scot
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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Marc MacFarlane
Marine Scotland
Licencing Operations Team
By email

06 August 2021

Dear Mr MacFarlane,

APPLICATION UNDER SECTION 36C OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO VARY THE CONSENT GRANTED
UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO CONSTRUCT AND OPERATE THE MORAY WEST
OFFSHORE WIND FARM

Thank you for consulting RSPB Scotland on the above noted application. The applicant seeks to remove the generation capacity limit of “around 850MW” and to increase the width of the rotor blades from 6 metres to 6.6 meters under the existing consented scenario to construct 72 Wind Turbine Generators.

The Moray West Offshore Windfarm in-combination with other windfarms in the Moray Firth and UK east coast, is predicted to have very substantial impacts on kittiwakes, guillemot, and razorbill. RSPB Scotland considers the impacts are unacceptable; are significant in EIA (Environmental Impact Assessment) terms; and constitute an adverse effect on integrity of relevant Special Protection Areas (SPAs), particularly for the kittiwake population at East Caithness Cliffs SPA. Our responses to the original proposed development (dated 7th September 2019 and 11th January 2018) are available on the Marine Scotland website.

We have reviewed the submitted information in relation to this variation application. We believe increasing the generating output without increasing the environmental impacts is logical in principle. Ultimately, we expect the generation capacity limit to be constrained by the grid connection and offshore export cable capacity.

We note from table 3.3 in Section 36 Consent Variation Application Report (Document reference: 8460005-DBI01-MWW-CLP-000002 Revision A 30/03/2021) there is no increase in predicted annual collision mortality rates associated within a blade width increase from 6 m to 6.6 m for the 72-turbine scenario. The largest change in collision risk is for kittiwake where 3 fewer collision per year are predicted. Despite this decrease, we consider there remains a substantial impact to seabirds from the proposed development. We are disappointed further steps have not been taken to reduce the collision risk.

We are aware that since the consent was originally granted, wind turbine technology has developed. Generating similar capacity with fewer, higher output turbines could realise a substantial reduction in impacts to seabirds and contribute toward realising maximum renewable capacity for least environmental effect. We would welcome further consideration is given to the potential opportunities that may exist for reducing the substantial predicted impacts to seabirds.

Yours sincerely,

Catherine Kelham

Senior Marine Conservation Planner

RSPB Scotland Headquarters

2 Lochside View
Edinburgh Park
Edinburgh
EH12 9DH

Tel: 0131 317 4100

Facebook: RSPBScotland

Twitter: @RSPBScotland

rspb.org.uk/Scotland



The RSPB is part of BirdLife International,
a partnership of conservation organisations
working to give nature a home around the world.

Royal Yachting Association

MacFarlane M (Marc)

From: Pauline McGrow <Pauline.McGrow@ryascotland.org.uk>
Sent: 21 July 2021 09:19
To: MS Marine Renewables
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Marc,

Thanks for the further information. I write to inform you that RYA Scotland still have no comment that they would wish to make on this application.

Kind Regards

Pauline

Pauline McGrow
Senior Administrator
Mob: 07436 296765

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



RYA Scotland, Caledonia House, 1 Redheughs Rigg, South Gyle, Edinburgh, EH12 9DQ
T: 0131 317 7388, Fax: 0844 556 9549

Protecting your personal information is important to us, view our full Privacy Statement [here](#)



From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 19 July 2021 16:43
To: MS.MarineRenewables@gov.scot

Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot

Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Dear Sir/Madam,

Please see a link to additional variation information in the email below, highlighted in yellow.

Kind regards,
Marc

From: MS Marine Renewables

Sent: 14 July 2021 17:20

To: MS Marine Renewables <MS.MarineRenewables@gov.scot>

Cc: England D (Debbie) <Debbie.England@gov.scot>; Sweeting S (Stephanie) <Stephanie.Sweeting@gov.scot>; MacFarlane M (Marc) <Marc.Macfarlane@gov.scot>

Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

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Yours faithfully,
Marc

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Scottish Environmental Protection Agency

MacFarlane M (Marc)

From: Planning.North <Planning.North@sepa.org.uk>
Sent: 21 July 2021 13:24
To: MS Marine Renewables
Cc: Planning.North
Subject: SEPA Response to Application to Vary Section 36 Consent - Moray West Offshore Wind Farm

Follow Up Flag: Follow up
Flag Status: Flagged

OFFICIAL – BUSINESS

Dear Sir/Madam

Thank you for your consultation dated 19 July 2021 regarding the above S36 application.

SEPA confirm we have no comments to make on this application.

Kind regards

Zoe Griffin

Planning Service North, SEPA
Email: planning.north@sepa.org.uk

Information on our planning service along with guidance for planning authorities, developers and any other interested party is available on our website at <http://www.sepa.org.uk/planning.aspx>.

**

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From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 19 July 2021 16:43
To: MS.MarineRenewables@gov.scot
Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

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Dear Sir/Madam,

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Kind regards,
Marc

From: MS Marine Renewables

Sent: 14 July 2021 17:20

To: MS Marine Renewables <MS.MarineRenewables@gov.scot>

Cc: England D (Debbie) <Debbie.England@gov.scot>; Sweeting S (Stephanie) <Stephanie.Sweeting@gov.scot>; MacFarlane M (Marc) <Marc.Macfarlane@gov.scot>

Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

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Yours faithfully,
Marc

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Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

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Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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OFFICIAL – BUSINESS

Scottish Fishermen's Federation

MacFarlane M (Marc)

From: Malcolm Morrison <M.Morrison@sff.co.uk>
Sent: 08 August 2021 12:47
To: MS Marine Renewables
Cc: England D (Debbie); Sweeting S (Stephanie); MacFarlane M (Marc)
Subject: FW: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Marc,

Having discussed this internally, and considered the papers provided, the SFF, on behalf of the 450+ Fishing Vessels in membership of its constituent associations, the The Anglo Scottish Fishermen's Association, Fife Fishermen's Association, Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association, and the FIRs related to the project and have agreed that we must object to this proposal.

The documents provide a lot of words about the development not having stated a maximum generation capacity at any time, without mentioning the simple fact that their grid connection is 860mw, which clearly is in line with the ability to produce 850mw. The SFF therefore questions why the need for the variation, as the inevitable result of granting it will be a need for further export capacity, causing more problems for the fleet fishing in the Moray Firth.

Having learned all about the use of the "Rochdale envelope" and previous variations, we have been dealing with this development since 2016, on the basis of 850mw. I would proffer that this constant variation scenario does not fit in with Gen1 from Scotland's National Marine Plan (SNMP) as its not a sustainable approach, indeed it is a very wasteful procedure. It certainly challenges Gen4 on co-existence, as they will need more export capability. The precepts in Gen17, Gen18 & Gen19 on Fairness, Engagement & Sound science are obviously more important to Fishing than renewables, as the capacity of the fishing industry to review and respond to every single variation is finite, as opposed to that of the developers.

At this stage in the growth of a new industry, the SFF feels that Gen20, on adaptive management should start looking at the new data developing on subjects like Electro-Magnetic Fields, and further-more Gen21 on the cumulative effects should be addressed. And to finish this line of thought, the SFF on reading of Fisheries policy 1 & 2 would expect to see the developer prove alignment with these before any application is considered.

If these variations are, time after time, accepted and licenced, the Marine Licencing system for Offshore Renewables is not going to be fit for purpose, as developers will take advantage of this route to extend the space they use, the MW they produce and the cabling required with no thought for Scotland's iconic fishing industry,

Best, Malcolm

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 19 July 2021 16:43
To: MS.MarineRenewables@gov.scot
Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot

Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Dear Sir/Madam,

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Kind regards,
Marc

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Sent: 14 July 2021 17:20

To: MS Marine Renewables <MS.MarineRenewables@gov.scot>

Cc: England D (Debbie) <Debbie.England@gov.scot>; Sweeting S (Stephanie) <Stephanie.Sweeting@gov.scot>; MacFarlane M (Marc) <Marc.Macfarlane@gov.scot>

Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

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Yours faithfully,
Marc

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Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

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Sport Scotland

MacFarlane M (Marc)

From: Gillian Kyle <Gillian.Kyle@sportscotland.org.uk>
Sent: 21 July 2021 15:51
To: MS Marine Renewables
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Follow Up Flag: Follow up
Flag Status: Flagged

Sportscotland has no comment on the proposed variation.

Kind regards,
Gillian

Gillian Kyle | Planner | [sportscotland](#)
Doges | Templeton on the Green | 62 Templeton Street | Glasgow | G40 1DA

m: [Redacted]
w: www.sportscotland.org.uk

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spòrsalba - am buidheann nàiseanta airson spòrs

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From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 14 July 2021 17:20
To: MS.MarineRenewables@gov.scot
Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot
Subject: [EXTERNAL] Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

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Yours faithfully,
Marc

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Aithris-àichidh – Tha am post-d seo diomhair agus air a rùnachadh a-mhàin don neach gu bheil e air a sheòladh. Mura h-e thusa an neach sin, feuch gun cuir thu às don phost-d seo is ceangalan sam bith agus leth-bhreacan uile, agus cuir fios sa bhad gu an neach-seòlaidh. Cuimhnich mas e do thoil e gu bheil cleachdadh neo-ùghdarraichte sam bith air an sgrìobhainn seo air a thoirmeasg gu tur.

Mar bhuidheann poblach, tha **spòrsalba** a' tighinn fo riathanasan an Achd Saorsa Fiosrachaidh (Alba) 2002 a thaobh foillseachadh air fiosrachadh sam bith (a' gabhail a-steach conaltradh eileagtronaigeach) a dh'fhaodadh a bhith aige mu chuspair sònraichte, nuair a thèid sin iarraidh air le neach no buidheann sam bith. Ma bhios dragh ann mu dheidhinn seo, is urrainn do **spòrsalba** comhairleachadh mun chùis. Gus teagamh a sheachnadh, bidh co-dhùnadh **spòrsalba** deireannach a thaobh ceistean foillseachaidh is neo-fhoillseachaidh.

Is e **spòrsalba** a tha a' gleidheadh dàta pearsanta a bheir sibh dhuinn ann am puist-dealain sam bith.

Thoiribh an aire gum bi an dàta pearsanta a bheir sibh dhuinn air a stòradh agus/no air a ghiullachd le **spòrsalba** gus seirbheisean a libhrigeadh no conaltradh ribh. Feuch gun tèid sibh gu <https://sportscotland.org.uk/privacy/> airson tuilleadh fiosrachaidh mu làimhseachadh air an dàta phearsanta agaibh.

Transport Scotland

MacFarlane M (Marc)

From: Erskine A (Andrew)
Sent: 05 August 2021 15:51
To: MS Marine Renewables
Cc: McPhillips G (Gerard); LOGAN Lesley (llogan@systara.com)
Subject: Moray West Offshore WF Variation TS Response Aug 2021
Attachments: Moray West Offshore WF Variation TS Response Aug 2021.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

Please find attached the Transport Scotland response to the Moray West Offshore Wind Farm Variation application.

Regards,

Andrew Erskine

Marine Scotland
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Your ref:

Our ref:
GB01T19K05

Date:
05/08/2021

MS.MarineRenewables@gov.scot

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017

APPLICATION UNDER SECTION 36C OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO VARY THE CONSENT GRANTED UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO CONSTRUCT AND OPERATE THE MORAY WEST OFFSHORE WIND FARM

With reference to your recent correspondence on the above development, we acknowledge receipt of the Variation Application Report (VAR) prepared by Moray West in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultant to Transport Scotland – Roads Directorate. Based on the review undertaken, we would provide the following comments.

Proposed Development

We understand that consent to construct and operate the Moray West Offshore Wind Farm and associated Offshore Transmission Infrastructure (OfTI) was granted in June 2019. Transport Scotland was consulted throughout the application process and we note that a Condition relating to the production of a Construction Traffic Management Plan protecting the interests of the Trunk Road Network was attached to the Consent (Condition 31).

Proposed Variation Application

We note that Moray West is now seeking to vary the Section 36 Consent, as follows:

- Requirement to increase the blade width of Wind Turbine Generators (WTGs) specified in the Section 36 Consent – Annex 1 under the 72-turbine scenario from 6 m to 6.6 m; and
- Request for removal of reference to Moray West having a 'maximum generating capacity of around 850 MW'

Having reviewed the VAR supporting the application, Transport Scotland does not consider that these variations will impact upon the trunk road network and, therefore, the conclusions of our previous response remain valid.

We can confirm that we have no objection to the proposed variation application, subject to Condition 31 being reattached to any consent granted. For clarity, Condition 31 is included below:

Condition 31. Construction Traffic Management Plan

In the event that major offshore components require onshore abnormal load transport, the Company must, no later than six months prior to the Commencement of the Development, submit a Construction Traffic Management Plan ("CTMP") in writing, to the Scottish Ministers for their written approval. Such approval may only be granted following consultation by the Scottish Ministers with Transport Scotland and any such other advisors as may be required at the discretion of the Scottish Ministers. Commencement of the Development cannot take place until such approval is granted. The CTMP must include:

- a) A mitigation strategy for the abnormal loads on the trunk road network including any accommodation measures required, incorporating the removal of street furniture, junction widening, or traffic management of road based traffic and transportation associated with the construction of the Development. All construction traffic associated with the Development must conform to the approved CTMP; and*
- b) Any additional signing or temporary traffic control measures deemed necessary due to the size or length of loads being delivered as a result of the Development.*

Reason: *To maintain the free flow and safety of the trunk road network.*

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact myself at the number above or alternatively, Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully
[Redacted]

Gerard McPhillips

**Transport Scotland
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

United Kingdom Chamber of Shipping

MacFarlane M (Marc)

From: Robert Merrylees <RMerrylees@ukchamberofshipping.com>
Sent: 15 July 2021 10:23
To: MS Marine Renewables
Subject: RE: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Marine Scotland,

Thank you for the consultation – nil return from the Chamber of Shipping.

Kind regards
Robert

From: MS.MarineRenewables@gov.scot <MS.MarineRenewables@gov.scot>
Sent: 14 July 2021 17:20
To: MS.MarineRenewables@gov.scot
Cc: Debbie.England@gov.scot; Stephanie.Sweeting@gov.scot; Marc.MacFarlane@gov.scot
Subject: Consultation - Application to Vary Section 36 Consent - Moray West Offshore Wind Farm - Response due by 11 August 2021

Dear Sir/Madam,

**THE ELECTRICITY ACT 1989 (AS AMENDED)
THE ELECTRICITY GENERATING STATIONS (APPLICATIONS FOR VARIATION OF
CONSENT) (SCOTLAND) REGULATIONS 2013 (AS AMENDED)**

**APPLICATION UNDER SECTION 36C OF THE ELECTRICITY ACT 1989 (AS AMENDED) TO
VARY THE CONSENT GRANTED UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 (AS
AMENDED) TO CONSTRUCT AND OPERATE THE MORAY WEST OFFSHORE WIND FARM**

On 30 March 2021, Moray Offshore Windfarm (West) Limited (Company Number: No 10515140 ("the Applicant")) submitted an application to the Scottish Ministers, in accordance with the above legislation, for a variation to the existing section 36 consent ("s.36 consent") for the Moray West Offshore Wind Farm. The variation request is to remove reference to the maximum generation capacity of "around 850MW" and to increase the width of the rotor blades from 6 metres to 6.6 meters under the existing consented scenario to construct 72 Wind Turbine Generators. No other amendment to physical parameters of the WTGs or associated infrastructure are being sought through this amendment.

If consent is granted for the variation application, the Scottish Ministers will consider exercising their discretion to vary the marine licence granted in respect of the offshore generating station on 14 June 2019. The variation would revise the description in Paragraph 2.1 of the marine licence to reflect the changes proposed by the variation application. The marine licence can be downloaded from: <https://marine.gov.scot/data/moray-west-offshore-wind-farm-06763-marine-licence>.

The variation application documentation can be downloaded from:
<https://marine.gov.scot/ml/section-36-consent-variation-moray-west-offshore-windfarm-moray-firth>.

If you wish to submit any representations in response to the consultation regarding the above variation application, please ensure they are submitted to the Scottish Ministers, in writing, to MS.MarineRenewables@gov.scot no later than **11 August 2021**.

If you have not responded by this date, the Marine Scotland Licensing Operations Team ("MS-LOT") will assume a 'nil return'.

MS-LOT will make your representations publicly available. Personal information will be redacted before the representations are made public. If you have any queries or concerns about how your personal data will be handled, please visit the MS-LOT [website](#) or contact MS-LOT at MS.MarineRenewables@gov.scot. Alternatively, please write to: Marine Scotland Licensing Operations Team, Marine Laboratory, 375 Victoria Road, Aberdeen AB11 9DB.

If you have any queries please do not hesitate to contact [MS-LOT](#).

Yours faithfully,
Marc

Marine Scotland - Marine Planning & Policy
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)300 244 5046
General Email: MS.MarineRenewables@gov.scot
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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