

Lees E (Emma)

From: KellyR <KellyR@angus.gov.uk>
Sent: 23 December 2020 09:51
To: MS Marine Renewables
Subject: RE: Seagreen 1A Limited - Additional Export Cable - Seagreen Alpha Bravo Offshore Wind Farms, Firth of Forth - Consultation on Request for Screening Opinion - Response required by 08 January 2020

Dear Sir/Madam,

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (As Amended)
Screening Opinion on the Proposed Marine Licence Application for the Installation of an Additional Export Cable from the Consented Seagreen Alpha And Seagreen Bravo Offshore Wind Farms, Firth Of Forth

I refer to your email consultation with accompanying attachment in connection with the above development proposal which was received by this Service on 11 December 2020.

The Screening Opinion request relates to the provision of an additional export cable from the consented Seagreen Alpha and Seagreen Bravo Offshore Wind Farms to a landfall location at Cockenzie, East Lothian.

Based on the information provided the scale, location and potential impacts arising from the installation of the additional export cable would be unlikely to have significant effects on the environment. Angus Council is therefore of the opinion that a full Environmental Impact Assessment is not required in this instance as it is considered that any potential impacts can be identified and mitigated without requiring the support of a full EIA. This view is based on the information contained in the Seagreen 1A Export Cable Corridor Screening Report however, it is the decision of your organisation to determine if a full EIA is required.

I trust the foregoing is of assistance.

Kind regards,

Ruari Kelly | Planning Officer (Development Standards) | Angus Council | 01307 492125 | kellyr@angus.gov.uk | www.angus.gov.uk

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Lees E (Emma)

From: Alistair Hilton <alistair.hilton@dundeecity.gov.uk>
Sent: 23 December 2020 14:10
To: MS Marine Renewables
Subject: Re: Seagreen 1A Limited - Additional Export Cable - Seagreen Alpha Bravo
Offshore Wind Farms, Firth of Forth - Consultation on Request for Screening
Opinion - Response required by 08 January 2020
Attachments: We found suspicious links

Thank you for sending us the EIA consultation material. I can advise that we have no comment to make on this particular EIA process.

Regards,

Alistair Hilton
Principal Planning Officer
Planning Team
City Development Department
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Dundee
DD1 1LS

E-mail: alistair.hilton@dundeecity.gov.uk
Corporate Web Site: www.dundeecity.gov.uk

Our Ref: CONS/GOV/2020 Seagreen offshore cable
Your Ref: None given

Date: date as email

Monica Patterson
EXECUTIVE DIRECTOR
(SERVICES FOR COMMUNITIES)

Via email to MS.MarineRenewables@gov.scot

John Muir House
Haddington
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Tel 01620 827827
Fax 01620 824295

Dear Sir/Madam,

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

**SCREENING OPINION ON THE PROPOSED MARINE LICENCE APPLICATION
FOR THE INSTALLATION OF AN ADDITIONAL EXPORT CABLE FROM THE
CONSENTED SEAGREEN ALPHA AND SEAGREEN BRAVO OFFSHORE WIND
FARMS, FIRTH OF FORTH.**

I refer to your email of 11 December 2020 seeking our views on the above, and your further email of 5 January 2021 allowing us until 12 January 2021 to respond.

The Screening Request is for a proposal known as Seagreen 1A Export Cable Corridor. Seagreen have been granted consent under Section 36 of the Electricity Act for windfarms (Seagreen Alpha and Bravo) off the Angus coast, as well as (through separate consent under town and country planning legislation) infrastructure to connect the wind turbines to the electricity grid at Tealing. Both proposals were subject to Environmental Impact Assessment. Consent was further granted for an increase in generating capacity for the windfarms. This variation application stated that none of the physical parameters of the developments would change and that there would be no implications for the environmental effects of the project. The Decision Notice for the proposed variation to increase capacity noted that there would be no physical changes. Environmental Impact Assessment was not required.

However, it now appears that further works (the cable which is the subject of this request and further works within East Lothian) will be required to allow the all of the electricity from the proposal, that of around 36 of the wind turbines, to be exported. These works are a change to the works previously consented and would therefore appear to fall within Part 13 of Schedule 2 of the above regulations.

The wind turbines have consent. However, they are expensive to build and install and it is unlikely the developer would do so if they could not get a return on them. Under condition 5 of the original consents, any wind turbines that fail to produce electricity on a commercial basis to the National grid for a continuous period of 12 months must be removed (unless otherwise agreed). It is not clear whether or not the 36 or so turbines from which this cable will export the power would be built if the cable is not consented. It might be that the developer would install fewer turbines. However they might also install the consented number of turbines but at a lower rated capacity than is possible (say if that is cheaper for the same output).

It is therefore not certain whether the construction of the 36 or so turbines should be considered as an effect of the consenting of the cable (and other export infrastructure) or not. If the construction of the wind turbines is in fact a consequence of building this cable, then those turbines and their environmental effects might need to be considered through the screening process.

Marine Scotland should come to a view on this issue.

In order to export electricity to the national grid via this cable, further onshore transmission works including a substation within East Lothian will be required. The cable route and onshore transmission works are integral to each other, as the electricity cannot be exported to the grid without both. In addition, section 4.5 of the Screening Report notes 'This [Operations & Maintenance team] is expected to be based in purpose built onshore O & M facilities, ideally situated on the quayside at the chosen operations port location. If there is no local airport or heli-port available, this facility could also accommodate the helicopter hangar and heli-pad if required'. The onshore works within East Lothian have not been screened however the developer has stated they will submit an Environmental Statement with the application for these works. I am not aware of whether the O & M facility is intended to be in East Lothian or if it will be included in that application. You may wish to consider whether the cable works can be considered separately from the onshore works within East Lothian in terms of EIA with regard to 'salami slicing'. The Council will require to do the same on receipt of any application or Screening Request for onshore works here.

The Council has the following comments on the environmental effects of the works included in the Screening Request on interests affecting East Lothian.

Local Air Quality, Dust, Noise and Vibration.

If there are construction works at landfall locations in close proximity to sensitive residential receptors then there could be impacts upon them due to noise, vibration and dust in the construction phase that can be adequately controlled via submission of a Construction Environmental Management Plan (CEMP) to address the following:

Air Quality - no significant Impacts upon National Air Quality Objectives during the construction phase are anticipated. However with regards to dust the CEMP should include details regarding practicable control measures for reducing visible dust emissions affecting properties beyond the site boundary. Control measures to be considered are identified in Section 8 of the Institute of Air Quality Management Guidance on the assessment of dust from demolition and construction (2014).

Noise – the CEMP should refer to “Best Practice Guidance” as recommended BS5228-1: 2009 “Code of practice for noise and vibration control on construction and open sites.

Noise impacts during the construction phase shall be assessed having regard to appropriate guidance and methodology. The CEMP shall include details of any mitigation measures required to ensure the following criteria can be met:

- Daytime Construction Noise – Predicted noise levels outside living room windows of noise sensitive properties shall not exceed the 70dB trigger level specified in BS 5228-1:2009 +A1:2014 Code of Practice for noise and vibration control on construction and open sites. Part 1: Noise.
- Night Time Construction Noise – Any noisy work during the night (2300-0700 hours) shall comply with the World Health Organisation Night Noise Guidelines for Europe (2009) which recommends a limit of 40dBnight, outside.

Vibration - It is possible that sub-surface tunnelling methods at the Landfall and open trenching or horizontal drilling for the onshore and offshore export cables may give rise to vibration. Vibration impacts during the construction phase shall be assessed. Any assessment to take account of BS 5228-1:2009 +A1:2014 Code of Practice for noise and vibration control on construction and open sites. Part 2: Vibration.

Biodiversity

The Council values its biodiversity, including that of the Firth of Forth SPA, the Forth Islands SPA, and the Outer Firth of Forth and St Andrews Bay Complex proposed marine SPA. It also values the marine mammals which are visitors to the East Lothian coast, including those from the nearby Isle of May SAC and further afield Moray Firth SAC. There is legislative provision for the protection of such sites and species. If NatureScot consider impacts should be assessed through EIA the Council would support their views.

Landscape

The Screening Report notes that visual disturbance from landfall works will be included within the onshore planning application and supporting environmental information. However, the intertidal works are part of this application, and therefore should be considered. The Screening Report notes that as the project will be an underwater cable there is no pathway for impact. No permanent signage has been included in the description of the project, for example to show where the cable is buried and this response is given on the basis that this is not necessary.

Air Quality and climate change

The applicant notes that no potential pathways are identified for the SG1A project. However the Report indicates both helicopter and shipping movements, as well as the use of materials (including concrete) that could cause emissions which could effect the climate and air quality. One of the main benefits of the project as a whole (the offshore wind turbines) is to reduce climate change emissions. Moving away from coal generation also improves air quality. The purpose of this change to the project is to enable 36 wind turbines to export electricity to the national grid. Whether or not the turbines as structures are considered part of the project, the savings of emissions to air including carbon dioxide resulting from export of additional renewable energy is attributable to the existence of the cable and other export infrastructure. Good practice advice from the IEMA advice on climate change mitigation (see <https://transform.iema.net/article/eia-and-search-significance>) notes that "Greenhouse gas emissions have a combined environmental effect that is approaching a scientifically defined environmental limit, as such any GHG emissions or reductions from a project might be considered to be significant."

The project therefore has both positive and negative impacts on climate. You may consider this is a significant effect in terms of EIA for the cable.

Fishing

Fish as a harvestable food resource and fishing boats/gear can be considered material asset in terms of EIA. It is not clear from the information provided what the impact will be on fishing within East Lothian, though some boats do operate from here. The Scoping Report notes there are some potential pathways to commercial fishery receptors. This is proposed to be the subject of consultation with commercial fisheries stakeholders. Some impacts will also be considered in an Environmental Appraisal, namely temporary loss or restricted access to fishing grounds; displacement of fishing activity into other areas and safety issues for fishing vessels. Interference

with fishing activity, increased steaming times and impacts to commercially exploited species will not be assessed.

Safety issues are potentially a significant issue however safety zones and other mitigation will be in place.

Mitigation

The Council is concerned to avoid impacts on its area including from accidental spillages of pollutants, as well as nuisance from dust and noise noted above, the introduction of invasive non-native species, and on fishing interests. Potential impacts have been noted, with mitigation measures outlined.

The applicant states on page 31 that “Due to the measures in place to control and/or manage waste, pollution and nuisance, which are expected to be secured by consent conditions, significant adverse effects on the environment are not predicted.” Where this mitigation is relied on to avert the need for EIA, the mitigation should be fully specified and evaluated at this stage to ensure there is confidence in its effectiveness. This is also the case for mitigation described for commercial fisheries. There is also the need for clear control measures to make sure that the mitigation is successfully implemented to avoid, reduce or offset the environmental impact. This is relevant for potential effects in East Lothian with regard to noise, accidental spillage of pollutants, invasive non-native species and possible risks to the health of the general public controlled through COSHH Regulations, and fisheries. If there is doubt that the mitigation described will be effective in avoiding a significant impact, EIA should be carried out.

If you would like to discuss the contents of this letter further, please contact J Squires via email or Skype at jsquires@eastlothian.gov.uk

Yours sincerely,

[Redacted]

Keith Dingwall
Planning Service Manager

Lees E (Emma)

From: Martin McGroarty <Martin.McGroarty@fife.gov.uk>
Sent: 28 December 2020 15:58
To: MS Marine Renewables
Subject: 20/03136/CON Seagreen A&B OWFs - Screening Opinion for additional export cable

FAO Emma Lees

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

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

SCREENING OPINION ON THE PROPOSED MARINE LICENCE APPLICATION FOR THE INSTALLATION OF AN ADDITIONAL EXPORT CABLE FROM THE CONSENTED SEAGREEN ALPHA AND SEAGREEN BRAVO OFFSHORE WIND FARMS, FIRTH OF FORTH.

Fife Council has not provided a formal opinion on the basis that this request relates to an area outwith our geographical jurisdiction.

We consider, however, that an additional cable in the same channel as the existing consented works would not significantly impact further on the environment than has already been assessed through the environmental assessments carried out to date.

Kind regards,
Martin

Martin McGroarty

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Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

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

Our case ID: 300047965

06 January 2021

Dear Marine Scotland,

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Proposed Marine Licence Application
Request for Screening Opinion for the installation of an additional export cable from the
consented Seagreen Alpha and Seagreen Bravo Offshore Wind Farms, Firth of Forth

Thank you for your consultation which we received on 14 December 2020 seeking our comments on an Environmental Impact Assessment (EIA) screening opinion for the above proposed development. This letter contains our comments for our historic environment interests. That is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, gardens and designed landscapes and battlefields on their respective Inventories.

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

Our Screening opinion

At this point, we are content that sufficient information has been provided in the screening report to demonstrate that any potentially significant effects on our interests are likely to be capable of mitigation. We will look forward to receiving an Environmental Appraisal to be produced in support of the Marine License application to clarify certain elements in terms of Marine Archaeology.

Our advice

The Seagreen 1A project is proposing to create an additional export cable corridor (approximately 108km) from the consented Seagreen Project Area to an identified landfall location at Cockenzie.

We welcome that an Environmental Appraisal to be produced in support of the Marine License application will consider in further detail the impact on the seabed disturbance



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resulting in loss or damage to shipwrecks, aircraft or anthropogenic geophysical anomalies.

We also welcome that the Seagreen 1A Project will prepare a marine heritage Written Scheme of Investigation and Protocol for Accidental Discoveries to avoid or mitigate accidental impacts and manage any accidental discoveries of archaeological interest.

We would be happy to review this prior to it being submitted.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Chloe Porter and they can be contacted by phone on 0131 668 8653 or by email on chloe.porter@hes.scot.

Yours faithfully

Historic Environment Scotland

Emma Lees
Marine Scotland – Licensing Operations Team
Marine Laboratory
PO Box 101
375 Victoria Road
Aberdeen
AB11 9DB

15 December 2020

Our ref: CNS REN OSWF SG –
Seagreen Offshore Wind Post-
application

Dear Emma

SEAGREEN 1A ADDITIONAL EXPORT CABLE

NATUTESCOT ADVICE ON REQUEST FOR SCREENING OPINION

Thank you for requesting our advice on the request for a screening opinion submitted by Seagreen Wind Energy Ltd for the addition of a single export cable (hereafter referred to as the SG1A project) from the consented Seagreen 1 offshore wind farm (formally called Alpha and Bravo) to landfall on the East Lothian coastline as detailed in Figure 1.1.

We have reviewed the Screening Report provided (document reference LF000012-CST-OF-LIC-DEV-REP-0001) and note that the cable route largely follows the route of the consented Inch Cape cable corridor route from Cockenzie out to the Inch Cape wind farm array area before tracking north east to the Seagreen 1 wind farm array area. The final landfall location (and export cable route) are yet to be determined with two potential landfall options identified - Cockenzie or Seton Sands. HDD or direct pipe is being considered for the Cockenzie landfall location (section 4.4) however no further information is provided in relation to Seaton Sands.

The Inch Cape export cable corridor was originally assessed in 2011 and revalidated in 2018 for the revised project design. However, Inch Cape have yet to reach financial closure (FID) and as such there are still many project elements that could still be refined including whether or not all 6 consented cables will be required. We welcome ongoing discussion to see how these projects may align.

EIA requirements

We are content that the SG1A project does not require a full EIA, as we acknowledge that much can be drawn across from the previous assessments, however, these cannot be relied upon exclusively. We support the need for a bespoke environmental appraisal to accompany the forthcoming Marine Licence application for the SG1A project and commend the commissioning of additional benthic surveys to validate and augment the existing baseline given the length of the intervening time period since original baseline characterisation.

With regard to the approach taken within the screening report - all of the key environmental receptors and impact pathways have been screened out across all development phases without any project-specific quantification or justification of these impacts, instead reference is made to these impacts as *previously been assessed as not significant in the Inch Cape or Seagreen ES*. We do not agree with this approach for the reasons stated above regarding lack of knowledge on the Inch Cape build out. We also advise insufficient consideration has been given to impacts to protected sites / features, despite the overlap with the SG1A project area, including the potential for in-combination effects.

Environmental Appraisal in support of the Marine Licence application

Going forward we advise that the accompanying Environmental Appraisal should concentrate on those site/features which lie adjacent to or overlap with the SG1A project area, noting that the project is likely to be completed within a year and will utilise up to two primary construction vessels with smaller support vessels for landfall works.

Pre-construction phase impact pathways

We advise on the need to consider pre-construction activities that can emit significant underwater noise e.g. UXO clearance and some geophysical activities. Impacts will require both assessment under EPS licensing as well as effects to designated sites with marine mammal and potential diadromous fish (Atlantic salmon) features. These impacts should be considered within the EA rather than post-consent.

Construction phase impacts

- Direct habitat loss / disturbance

Despite the temporary nature of this impact pathway during construction, quantification of any habitat loss should be provided to assess the impact on habitat/benthic features as well as habitats used by seabirds or migratory birds. We advise therefore that the Outer Firth of Forth and St Andrews Bay Complex SPA which overlaps with the cable corridor as well as the Firth of Forth SPA which overlaps with the landfall locations are screened in for all features so that this can be considered further. We also advise that the features of Firth of Forth Banks Complex Nature Conservation MPA will need to be assessed for any potential impact pathways.

- Disturbance and or displacement

Disturbance / displacement effects during construction should be considered for all the qualifying features for Outer Firth of Forth and St Andrews Bay Complex SPA, the Firth of Forth SPA (& SSSI)

as well as seabird qualifying features (e.g. guillemot, kittiwake, puffin, razorbill (and seabird assemblage)) of Forth Islands SPA. A qualitative assessment based on vessel movements and areas occupied by activity should be undertaken. Depending on the construction schedule consideration maybe required for the Isle of May SAC designated for grey seals.

Operation & maintenance phase

- Changes to prey availability

We don't yet know the extent to which introducing hard structures (e.g. cable protection) to soft sediment environment will have on benthic and fish communities and the inter play across trophic levels. This impact should be considered for all the qualifying features for Outer Firth of Forth and St Andrews Bay Complex SPA and the seabird qualifying features of the Forth Islands SPA.

- EMF / barrier effects

Greater consideration of EMF effects for diadromous fish particular Atlantic salmon is required. It is likely that key current research projects being undertaken by Marine Scotland Science will have reported or will have results that can be utilised in the assessment and mitigation of this project.

Decommissioning phase impact pathways

Our advice above for construction phase impacts should also be considered for decommissioning phase activities.

Cumulative / In-combination impacts

The approach taken for consideration of cumulative impacts or in-combination effects mirrors that described above where the conclusions from the previous Inch Cape and or Seagreen ESs have been utilised without any project-specific quantification or justification. It would be helpful to revisit this and consider what other works may be sequential or operating at the same time that may need to be assessed further.

Further information and advice

We are happy to discuss further any aspect of our advice. Please contact myself, Karen Taylor or Erica Knott in the first instance for any further advice.

Yours sincerely,

Karen Taylor

Marine Sustainability Adviser

karen.taylor@nature.scot



Lees E (Emma)

From: Miller, Craig <CMiller@scotborders.gov.uk>
Sent: 15 December 2020 10:48
To: MS Marine Renewables
Subject: FW: Seagreen 1A Limited - Additional Export Cable - Seagreen Alpha Bravo Offshore Wind Farms, Firth of Forth - Consultation on Request for Screening Opinion - Response required by 08 January 2020
Attachments: Screening Report.pdf

Emma

Due to the remote location of this installation from the Scottish Borders, we have no comments to make on this Screening Request but thank you for consulting us,

Regards

Craig

Craig Miller
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