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Seagreen 1A Screening Letter

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**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017 AND THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017**

**PROPOSED SEAGREEN PROJECT SECTION 36 VARIATION APPLICATION – REQUEST FOR
SCREENING OPINION**

With this letter and attached Screening Report, Seagreen Wind Energy Limited (SWEL) are writing to request a formal Environmental Impact Assessment (EIA) Screening Opinion from the Scottish Ministers via the Marine Directorate - Licensing Operations Team (MD-LOT) for a proposed Variation to the consented Seagreen Project. SWEL intends to request a Variation to the existing Seagreen Alpha and Bravo Section 36 consents under Section 36C of the Electricity Act 1989.

The Variation is to allow a deferred start date for the phase 1A (Seagreen1A) to allow construction of the final 36 turbines to start from any date between January 2029 and December 2032. It should be noted that the duration of the construction is not intended to change beyond that already assessed.

Within the accompanying Screening Report, Sections 1 and 2 provide an introduction to the project and provide a summary of the consenting history associated, as well as outlining the requested Variation to consents and its appropriateness, which would allow the project to extend its permitted installation window to 2032. Sections 3, 4 and 5 provide a review of the environmental topics assessed in previous Environmental Statement (ES) and screen out impacts where it is clear there will be no changes to the impact significance as a result of the Variation. The Screening Report, submitted alongside this Screening Letter provides a more detailed review of potential impacts resulting from the project changes associated with this Variation; a summary of the technical topics assessed in the original ES, reassessed for potential impacts generated by the Variation is provided below in Table 1.0.

Table 1.0 Summary of Screening Outcome

Topic	2012 ES Significant Effects	Critically Assessed in Screening Report	2024 Screening Report Outcome
Archaeology and Cultural Heritage	No significant effects following application of mitigation.	No	Following a review of the impact summary table that was presented in the 2012 ES and the potential project implications, as set out in the Screening Report, the Variation's parameter changes will have no likely significant effects on archaeology and cultural heritage above and beyond those assessed in the 2012 ES. There will be no likely significant effects or significant adverse effects in respect of this topic.
Benthic & Intertidal Ecology	No significant effects.	No	Following a review of the impact summary table that was presented in the 2012 ES and the potential project implications, as set out in the Screening Report, the Variation's parameter changes will have no likely significant effects on benthic and intertidal ecology above and beyond those assessed in the 2012 ES. There will be no likely significant effects or significant adverse effects in respect of this topic.
Commercial Fisheries	Pre-mitigation significant effects on crab and lobster fishery activities during construction only.	Yes	The re-assessment presented in the Screening Report, concluded that through the shift in construction schedule proposed in this amendment request, a lower level of temporal overlap is expected between the construction phases of local projects. In instances where there is temporal overlap between the construction phases of the Seagreen project and the adject OWF developments within the area, mitigation including establishment of Regional Fisheries Working Groups and continuing the use of rolling safety zones (as currently committed to under the Fisheries Management and Mitigation Strategy), will assist in mitigating cumulative temporary loss of access and displacement of fishing vessels to other areas. Therefore, the Variation's parameter changes will have no likely significant effects on commercial fisheries above and beyond those assessed in the 2012 ES. There will be no likely significant effects or significant adverse effects in respect of this topic.
Fish and Shellfish	Pre-mitigation significant effects from noise on the behaviour of herring.	Yes	The re-assessment presented in the Screening Report, concluded a shift to the construction window (noting that the duration of the construction period remains unchanged from that assessed in the original 2012 ES) is assessed as having no material change to underwater noise during construction, operation or decommissioning, this there is no increased impact on fish and shellfish. However, the cumulative effects of underwater noise disturbance resulted in a worst-case assumption of a significant effect for herring. In order to mitigate this effect, Seagreen 1A will coordinate with the Berwick Bank development to ensure that no instances of concurrent piling occur in order to minimise or mitigate the potential for cumulative disturbance or damage to sensitive fish and shellfish species as a result of underwater noise and vibration.

Topic	2012 ES Significant Effects	Critically Assessed in Screening Report	2024 Screening Report Outcome
			<p>The project will work to ensure that there is no overlap in piling activities with Berwick Bank is to minimise or mitigate the potential for cumulative disturbance or damage to sensitive fish and shellfish species as a result of underwater noise and vibration. With these commitments in place, the magnitude of the cumulative impact is expected to be reduced to a Minor, Not Significant effect.</p> <p>Therefore, the Variation's parameter changes will have no likely significant effects on fish and shellfish above and beyond those assessed in the 2012 ES.</p> <p>There will be no likely significant effects or significant adverse effects in respect of this topic.</p>
Landscape, Seascape & Visual	<p>Potentially significant effects on:</p> <ul style="list-style-type: none"> Regional Character Areas (SA3, SA4) Visual Amenity (VP2, VP5) Settlements within 35 km Sustrans National Cycle Network (NCN) 1 Local vantage points and car parks within 35 km Recreational boats and yachts Bell Rock Lighthouse <p>Cumulative on:</p> <ul style="list-style-type: none"> National Seascape Area 4 Regional Character Area (SA3, SA4, SA5, SA6) Visual amenity (VP2, VP5) Settlements within 35 km, especially St Cyrus Sustrans NCN1 	No	<p>Following a review of the impact summary table that was presented in the 2012 ES and the potential project implications, as set out in the Screening Report, the Variation's parameter changes will have no likely significant effects on landscape, seascape and visual, above and beyond those assessed in the 2012 ES.</p> <p>There will be no likely significant effects or significant adverse effects in respect of this topic.</p>

Topic	2012 ES Significant Effects	Critically Assessed in Screening Report	2024 Screening Report Outcome
	Local vantage points and car parks Recreational boats and yachts Bell Rock Lighthouse		
Marine Mammals	Moderate adverse and significant in harbour seal from underwater noise (piling).	Yes	<p>The re-assessment in the Screening Report, concluded that a shift to the construction window (noting that the duration of the construction period remains unchanged from that assessed in the original 2012 ES) is assessed as having no material change to underwater noise produced during construction, operation or decommissioning as a result of the shift, thus there is no increased impact on marine mammals expected. However, cumulative behavioural disturbance from underwater noise generated across projects in the vicinity of the Seagreen 1A is assessed as Significant in EIA terms for harbour seal, grey seal, harbour porpoise, and common bottlenose dolphin. It should be noted that these species assessments are not consistent across years, with the greatest impacts predicted at the start of the construction window, where there is greater overlap with other projects. Seagreen 1A will commit to coordinate with Berwick Bank to avoid concurrent piling. Seagreen will also engage with other relevant developers active in this region to avoid, where reasonably practicable, or minimise potential overlap of piling between projects. This proposed mitigation will minimise cumulative effects from disturbance from underwater noise on sensitive marine mammal species within the region. With these commitments in place, the magnitude of the cumulative impact is expected to be reduced to Not Significant.</p> <p>Therefore, the Variation's parameter changes will have no likely significant effects on marine mammals above and beyond those assessed in the 2012 ES.</p> <p>There will be no likely significant effects or significant adverse effects in respect of this topic.</p>
Military & Civil Aviation Activities	None following technical mitigation proposed.	No	<p>Following a review of the impact summary table that was presented in the 2012 ES and the potential project implications, as set out in the Screening Report, the Variation's parameter changes will have no likely significant effects on military and civil aviation activities, above and beyond those assessed in the 2012 ES.</p> <p>There will be no likely significant effects or significant adverse effects in respect of this topic.</p>

Topic	2012 ES Significant Effects	Critically Assessed in Screening Report	2024 Screening Report Outcome
Nature Conservation and HRA	No Adverse Effect on Site Integrity is determined for all considered sites.	Yes	<p>The re-assessment in the Screening Report, concluded that a shift to the construction window (noting that the duration of the construction period remains unchanged from that assessed in the original 2012 ES) is assessed as having no material effect on activities or parameters associated with the project. Therefore, the impacts associated with the Project alone, were determined to remain as previously assessed, as no adverse effect. With temporal overlap between Seagreen 1A and other development construction and operation, there is potential for in combination effects. With the implementation of relevant mitigation measures, the effect of the Site Integrity is determined No Adverse Effect, for all considered sites.</p> <p>Therefore, the Variation's parameter changes will have no adverse effects beyond those assessed in the 2012 ES. There will be no likely significant effects or significant adverse effects in respect of this topic.</p>
Ornithology	<p>Effects were assessed as not significant for all species during construction, operation and decommissioning.</p> <p>The potential for moderate and significant impacts on auk species: guillemot, razorbill and puffin, as a result of indirect effects on their sandeel prey due to piling during construction were identified.</p> <p>During operation, collision risk had the potential to cause significant effects on regional gannet, kittiwake, herring gull and greater black-backed gull populations at one or both projects.</p>	Yes	<p>The re-assessment presented in the Screening Report, concluded that a shift to the construction window (noting that the duration of the construction period remains unchanged from that assessed in the original 2012 ES) is assessed as having no material effect on collision estimates and subsequent ornithological impacts associated with the Project alone. The temporal overlap between Seagreen 1A and other development construction, is anticipated to increase the likelihood of cumulative vessel disturbance for ornithology receptors, specifically in regard to Berwick Bank OWF's construction period. However, the spatial segregation between these two project and small occupational areas of construction vessels during this period, cumulative impacts are expected to be minimal and unlikely to exceed minor adverse effect. Cumulative habitat loss during the construction phase is also considered, however, habitat loss at any given time will be confined to within the development area of the respective projects and is likely to be small in comparison to the regional habitat availability. Therefore, assessment determined that cumulative habitat loss is expected to be small and unlikely to exceed minor adverse effect. The 2012 ES concluded that vessel-related disturbance during the construction phase would result in negligible impacts to all key offshore ornithology receptors (Seagreen, 2012), therefore the change in construction programme for the Seagreen Project alone is not expected to result in a greater effect on any seabirds due to disturbance.</p> <p>Therefore, the Variation's parameter changes will have no likely significant effects beyond those assessed in the 2012 ES.</p> <p>There will be no likely significant effects or significant adverse effects in respect of this topic.</p>
Other Marine Users	No significant effects.	No	<p>Following a review of the impact summary table that was presented in the 2012 ES and the potential project implications, as set out in the Screening Report, the Variation's parameter changes will have no likely significant effects on other marine users, above and beyond those assessed in the 2012 ES.</p>

Topic	2012 ES Significant Effects	Critically Assessed in Screening Report	2024 Screening Report Outcome
			There will be no likely significant effects or significant adverse effects in respect of this topic.
Physical Environment	No significant effects.	No	Following a review of the impact summary table that was presented in the 2012 ES and the potential project implications, as set out in the Screening Report, the Variation's parameter changes will have no likely significant effects on the physical environment, above and beyond those assessed in the 2012 ES. There will be no likely significant effects or significant adverse effects in respect of this topic.
Shipping & Navigation	No significant effects following mitigation.	Yes	Following a review of the impact summary table that was presented in the 2012 ES and the potential project implications, as set out in the Screening Report, the Variation's parameter changes will have no likely significant effects on shipping and navigation, above and beyond those assessed in the 2012 ES. There will be no likely significant effects or significant adverse effects in respect of this topic.
Socioeconomic, Tourism and Recreation	Significant beneficial effects on: expenditure in Scotland during construction and operation Employment in Scotland during construction and operation	No	Following a review of the impact summary table that was presented in the 2012 ES and the potential project implications, as set out in the Screening Report, the Variation's parameter changes will have no likely significant effects on socioeconomic, tourism and recreation, above and beyond those assessed in the 2012 ES. There will be no likely significant effects or significant adverse effects in respect of this topic.
Water and Sediment Quality	No significant effects.	No	Following a review of the impact summary table that was presented in the 2012 ES and the potential project implications, as set out in the Screening Report, the Variation's parameter changes will have no likely significant effects on water and sediment quality, above and beyond those assessed in the 2012 ES. There will be no likely significant effects or significant adverse effects in respect of this topic.

Based on the technical assessments provided in the Screening Report (and summarised above), the Variation will not give rise to any likely significant adverse environmental effects, alone or in combination with other projects, compared to the consented Seagreen Project – noting that Seagreen 1A will coordinate with Berwick Bank to avoid concurrent piling and, due to the uncertainty associated with consent / build out timelines of the assessed projects, to update the cumulative assessment prior to construction in order to confirm if there is a significant impact cumulatively and hence inform the need for further mitigation.

As the Variation is not likely to have significant effects on the environment, SWEL propose the Section 36 Variation application does not require an EIA under the Electricity Works EIA Regulations or the Marine Works EIA Regulations and that the Variation should be screened out of the requirement for EIA.

SWEL acknowledges that a deferred start date for phase 1A raises challenges in how to condition the length in years of the duration of the consent for both phases. SWEL anticipates that MD-LOT will wish to amend the S36 consent to control the length of duration to be 25 years after final commissioning for each separate phase of the project as originally assessed. SWEL wishes this to be considered in the screening opinion. SWEL will discuss with MD-LOT potential changes to the wording of the consent in this regard once the outcome of this screening is known.

Yours faithfully

Ellie Noble

Seagreen 1A Consents Manager