

FAO Ben Walker
Offshore Renewable Energy Projects
Marine Directorate Licensing Operations Team
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

West of Orkney Windfarm
32 Charlotte Square
Edinburgh
EH2 4ET

Reference: WO1-WOW-CON-EN-AP-0001

20 September 2023

Application by Offshore Wind Power Limited for Consent to Construct and Operate a Generating Station, West of Orkney Windfarm

Electricity Act 1989 (as amended)

The Electricity (Applications for Consent) Regulations 1990 (as amended)

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended)

Marine and Coastal Access Act 2009

Marine (Scotland) Act 2010

The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended)

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Dear Mr Walker,

The Applicant, Offshore Wind Power Limited (OWPL), a joint venture between Corio Generation, TotalEnergies and Renewable Infrastructure Development Group (RIDG) are proposing the development of The West of Orkney Windfarm, herein referred to as the Project.

This application is being submitted by OWPL for:

- Consent under Section 36 of the Electricity Act 1989 (Section 36 Consent) for the construction and operation of an offshore generating station (the West of Orkney Windfarm); and
- A declaration under Section 36A of the Electricity Act 1989 extinguishing public rights of navigation only so far as they pass through the locations in the sea where the structures forming part of the West of Orkney Windfarm are to be placed.

This letter is also accompanied by applications for the following Marine Licences under Part 4 of the Marine and Coastal Access Act 2009 and Part 4 of the Marine (Scotland) Act 2010:

- Marine Licence for the Generating Station consisting of: Wind Turbines Generators (WTGs), WTG foundations, inter array cables and associated scour and cable protection.
- Marine Licence for the Offshore Transmission Infrastructure consisting of: up to five Offshore Substation Platforms (OSPs), OSP foundations, up to six interconnector cables, up to five export cables and associated scour and cable protection).

Overview of the Project

Components of the Project located seaward of Mean High-Water Spring (MHWS), are referred to as the 'offshore Project'. The offshore Project boundary encompasses the Option Agreement Area (OAA), the Export Cable Corridor (ECC) and landfall up to MHWS where the offshore cables interface with the onshore Project.

The Option Agreement Area (OAA), located in the N1 Plan Option, covers an area of 657 km² and is located approximately 28 km west of Hoy, Orkney and 23 km from the north coast of Scotland. The OAA is the subject of an Option to Lease Agreement (OLA) from Crown Estate Scotland (CES) following the ScotWind award in January 2022. The offshore Export Cable Corridor (ECC) up to MHWS covers an area of 125 km² and arrives at two landfall options in Caithness.

The generating station components (as detailed by the first Marine Licence), as well as some of the transmission infrastructure (OSPs, OSP foundations, inter-connector cables and scour and cable protection; detailed by the second Marine Licence) will all be located within the OAA. The export cable transmission infrastructure (also covered by the second Marine Licence) is located within the ECC.

The generating station infrastructure will comprise of up to 125 fixed bottom WTGs, which will be located within the OAA. The WTGs will be installed on either monopiles, piled jackets, or suction bucket jacket foundations, with inter array cabling connecting the WTGs together (and to the OSP), and scour and cable protection.

There will be up to five OSPs located within the OAA. The OSPs will be installed on either piled jackets or suction bucket jacket foundations and connected to one another via interconnector cables.

The ECC will contain up to five offshore export cables, connecting the OSPs from the OAA to the landfall location(s) on the north coast of Caithness at Greeny Geo and/or Crosskirk.

The onshore components of the West of Orkney Windfarm include landfall infrastructure consisting of: onshore underground export cables, an OWPL onshore substation station and a connection to the new Scottish Hydro-Electric Transmission plc (SHET-L) 420kV Grid Spittal 2 substation, located at or near Spittal, Caithness. A separate application for Planning Permission in Principle will be submitted to The Highland Council for the onshore components.

As detailed in OWPL's Scoping Report, OWPL are also considering an additional export cable to provide power to the proposed Flotta Hydrogen Hub. However, this application does not include connection to the Flotta Hydrogen Hub which will be subject to separate offshore and onshore applications once further development work has been undertaken. The Flotta Hydrogen Hub has been considered in the assessment of cumulative impacts for the current Offshore EIA Report.

Description of the Works – Generating Station

The West of Orkney Windfarm generating station will comprise of the following key components:

- Up to 125 wind turbines (each comprising of a tower section, nacelle, and three rotor blades).
Maximum parameters of the wind turbines:
 - Maximum rotor blade tip height of 359.52 m (measured from Lowest Astronomical Tide (LAT));
 - Maximum rotor blade diameter of 330 m;
 - Minimum rotor blade tip to sea clearance of 29.52 m (measured from LAT);
 - Maximum hub height of 194.52 m (measured from LAT);
 - Minimum WTG spacing of 944 m.
- Wind turbine foundations including monopiles, piled jackets or suction bucket jackets;
- Up to 140 inter-array cables with a total length of up to 500 km; and
- Scour protection and inter-array cable protection

Description of the Works – Offshore Transmission Infrastructure

The West of Orkney Windfarm offshore transmission infrastructure will comprise of the following key components:

- Up to five OSPs
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- OSP foundations consisting of either piled jackets or suction bucket jackets;
- Up to five export cables with total maximum length of up to 320 km
- Scour protection and cable protection

Compliance with the Environmental Impact Assessment (EIA) Regulations and Habitats Regulations

An Environmental Impact assessment (EIA) has been completed for the Proposed Development in accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended), The Marine Works (Environmental Impact Assessment) Regulations 2017 (as amended) and The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended). The EIA Report has been submitted as part of this consent application.

A Report to Inform an Appropriate Assessment (RIAA) has been completed based on the outcomes from the HRA Screening (assessment of likely significant effects (LSE)) in order to assist with the Appropriate Assessment to be undertaken in accordance with the Conservation (Natural Habitats, & c.) Regulations 1994, The Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (collectively referred to as the "Habitats Regulations").

Derogation case

The Applicant has provided a without prejudice derogation case that contains evidence from the Applicant on the Habitats Regulations Assessment (HRA) Derogation Provisions. It demonstrates that the HRA Derogation Provisions can be satisfied if it is necessary to resort to them to authorise the offshore components of the West of Orkney Wind Farm.

The Applicant's submission is provided without prejudice to the Applicant's position that it can be concluded beyond reasonable scientific doubt that the Project would not give rise to any Adverse Effect on Integrity, either alone or in combination with other plans or projects.

Documentation enclosed

The documents submitted as part of the West of Orkney Windfarm Section 36 Consent application and associated Marine Licence applications include:

- This cover letter, comprising an application for Section 36 Consent and requesting a declaration under Section 36A.
 - A Marine Licence application and supporting information for the Generating Station.
 - A Marine Licence application and supporting information for the Offshore Transmission Infrastructure.
 - An Environmental Impact Assessment (EIA) Report:
 - Non-Technical Summary
 - Volume 1 – Introductory Chapters and Specialist Assessment Chapters
 - Volume 2 – Technical Appendices and Annexes including a Navigational Risk Assessment (NRA)
 - Volume 3 – Outline Management Plans
 - Report to Inform Appropriate Assessment (RIAA)
 - Without Prejudice Derogation Case Documents:
 - Without Prejudice Derogation Case
 - Compensation Measures Plan
 - Compensation Implementation and Monitoring Plan
 - Consent Application Accompanying Documents:
 - Offshore Planning Statement
 - Pre-Application Consultation (PAC) Report & appendices (for the Offshore and Onshore Project).
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Onshore Application

The onshore transmission infrastructure associated with the West of Orkney Windfarm shall be the subject of a separate application for Planning Permission in Principle under the Town and Country Planning (Scotland) Act 1997.

Public Notices / Advertisements

Public notices advising that OWPL has submitted applications for a Section 36 Consent and Marine Licences to Marine Directorate Licensing and Operations Team (MD-LOT) and inviting the public to submit comments on the application will be placed in the following publications on dates to be agreed with Marine Directorate's Licensing and Operations team:

- Caithness Courier
- John O'Groat Journal
- The Orcadian
- The Herald
- The Press & Journal
- Fishing News
- Lloyd's List
- Edinburgh Gazette

The adverts will advise the public how to participate in the consultation on the application, in accordance with The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended), The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Electricity (Applications for Consent) Regulations 1990.

Hard copies of the application documents will be made available for the public to view in the following locations:

Location	Address	Opening Hours
Thurso Library	Davidson's Lane Thurso KW14 7AF	Monday and Wednesday - 10:00 am - 18:00 pm Tuesday and Friday - 10:00 am - 20:00 pm Thursday and Saturday - 10:00 am - 13:00 pm
Stromness Library	2 –12 Victoria Street Stromness Orkney KW16 3AA	Monday to Friday - 10am – 4pm Saturday - 12pm – 3pm
Bettyhill Hotel	A836 Bettyhill KW14 7SP	Monday – Sunday: 3:00 – 22:30 pm
The Highland Council Headquarters	Glenurquhart Road, Inverness IV3 5NX	Monday to Friday: 8:00 am – 16:00 pm
Orkney Library & Archive	44 Junction Road Kirkwall, Orkney KW15 1AG	Monday to Thursday: 10:00 am – 18:00 pm Friday to Saturday: 10:00 am to 17:00 pm
Xodus Group	8 Garson Place Stromness KW16 3EE	Monday to Friday: 9:00 am – 17:00 pm
West of Orkney Windfarm	32 Charlotte Square Edinburgh EH2 4ET	Monday to Friday: 9:00 am – 17:00 pm

Once the application has been accepted by the Marine Directorate's Licencing and Operations Team, the application documents will also be published online at www.westoforkney.com.

Hard copies can also be made available on request. These will be subject to a charge of £350 and £10 on CD/USB stick (including post and packaging). Copies of a short non-technical summary are available free of charge. Requests for hard copies of the application documents can be made at: info@westoforkney.com.

We look forward to hearing from you in relation to the formal acceptance of the applications.

Yours faithfully,

<Redacted>

Stephen Kerr
Project Director
West of Orkney Windfarm
