SALAMANDER
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FAO Ben Walker

Marine Directorate Licensing Operations Team
Marine Laboratory
375 Victoria Road
Aberdeen AB11 9DB

26 April 2024

Dear Mr. Walker,

Salamander Offshore Wind Farm: Application for Section 36 Consent and Marine Licences

Salamander Wind Project Company Limited ("the Applicant"), formerly Simply Blue Energy (Scotland) Limited (Company Number SC662940), a joint venture partnership between Ørsted, Simply Blue Group and Subsea7, is proposing to develop the Salamander Offshore Wind Farm, a floating offshore wind farm with an installed capacity of up to 100 megawatts (MW).

This application is being submitted by the Applicant for consent under Section 36 of the Electricity Act 1989 (Section 36 Consent) for the construction and operation of an offshore generating station (the Salamander Offshore Wind Farm).

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

- the generating station, consisting of:
    - Wind Turbine Generators (WTGs);
    - floating substructures;
    - mooring and anchoring systems;
    - subsea connection hubs;
    - inter-array cables; and
    - associated scour and cable protection.
- the offshore transmission infrastructure, consisting of:
    - up to two export cables; and
    - associated scour and cable protection.

Together the Section 36 Consent application and Marine Licence applications are referred to as "the Application".

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Overview of the Project

The offshore components of the Salamander Offshore Wind Farm (the "Salamander Project") located seaward of Mean High Water Springs (MHWS) are referred to as the 'Offshore Development' and include the generating station together with the offshore transmission infrastructure. The Offshore Development Area encompasses the Offshore Array Area, the Offshore Export Cable Corridor and landfall up to MHWS where the offshore export cables interface with the onshore components of the Salamander Project.

The Offshore Array Area covers an area of 33.25 km^2 and is located approximately 35 km off the coast of Peterhead, Aberdeenshire. The Offshore Array Area is the subject of an Exclusivity Agreement from Crown Estate Scotland following the Innovation and Targeted Oil & Gas (INTOG) award in March 2023 and will soon be subject to an Option Agreement. The Offshore Export Cable Corridor up to MHWS covers an area of 47.4 km^2 and arrives at landfall north of Peterhead.

The generating station components, as well as part of the offshore transmission infrastructure (parts of the export cables and associated scour and cable protection) will all be located within the Offshore Array Area. The offshore transmission infrastructure will also be located in the Offshore Export Cable Corridor (as detailed in the Marine Licence Application).

The generating station will comprise of up to seven floating WTGs, which will be located within the Offshore Array Area. The WTGs will be installed on floating semi-submersible (barge / buoy / hybrid) or tension-leg platforms, moored and anchored to the seabed, with inter-array cabling connecting the WTGs together and to subsea connection hubs, and associated scour and cable protection.

The Offshore Export Cable Corridor will contain up to two offshore export cables, connecting the subsea connection hubs and/or inter-array cables from the Offshore Array Area to the landfall location to the north of Peterhead.

The onshore components of the Salamander Project include landfall infrastructure to Mean Low Water Springs (MLWS) consisting of: transition joint bay(s) to join the offshore and onshore export cables, onshore export cables, an onshore substation, energy balancing infrastructure and a grid connection to the Scottish and Southern Electricity Networks substation. The Salamander Offshore Wind Farm is expected to connect to the onshore transmission network at the new Salamander 132 kV substation located near the existing St Fergus-Peterhead overhead line, together with associated infrastructure. The onshore components are subject to separate applications, for planning permission from Aberdeenshire Council, and for Section 36 Consent and deemed planning permission from the Energy Consents Unit on behalf of the Scottish Ministers.

Description of the Works – Generating Station

The Salamander Offshore Wind Farm generating station will comprise the following key components:

- Up to seven wind turbines (each comprising a tower section, nacelle, and rotor blades).
- Maximum parameters of the wind turbines:
    - Maximum rotor blade tip height of 310 m above Ordnance Datum Newlyn (ODN);
    - Maximum rotor blade diameter of 250 m;
    - Minimum rotor blade tip to sea clearance of 22 m (measured from Still Water Level (SWL) for semi-submersible, and measured from Lowest Astronomical Tide (LAT) for tension-leg platform);

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  - Maximum hub height of 172.5 m (measured from SWL);
  - Minimum WTG spacing of 1,000 m (measured from centre point of WTG tower).
- Up to seven associated floating substructures;
- Up to eight mooring lines for each floating substructure (56 in total);
- Up to eight anchors for each floating substructure (56 in total);
- Up to two subsea connection hubs, and their associated foundations;
- Up to eight inter-array cables (both dynamic and static) with a total combined length of up to 35 km; and
- Scour protection and inter-array cable protection.

Description of the Works – Offshore Transmission Infrastructure

The Salamander Offshore Wind Farm offshore transmission infrastructure will comprise the following key components:

- Up to two static export cables with total combined length of up to 85 km; and
- Scour protection and cable protection.

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

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

A Report to Inform Appropriate Assessment (RIAA) has been completed based on the outcomes from the Habitats Regulations Appraisal (HRA) Screening (assessment of likely significant effects) to inform 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

Under the Habitats Regulations, where the risk of adverse effects on the integrity (AEOI) of a European site cannot be excluded, the decision-maker may grant consent for the project where there are no alternative solutions, the project must be carried out for imperative reasons of overriding public interest (IROPI) and subject to compensatory measures being taken to ensure that the overall coherence of the European site network is protected. These three tests – no alternative solutions, IROPI and compensatory measures – form the Derogation Case on which the decision-maker should be satisfied before granting consent for the project.

Conclusions reached in the RIAA have identified the potential for AEOI on Kittiwake. In view of these conclusions, it is necessary to provide the requisite information and justification (the Derogation Case) to satisfy the derogation

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provisions of the Habitats Regulations in respect of the species for the Special Protection Areas (SPAs) identified. The documents comprising the Derogation Case are included as part of this Application. The Derogation Case made as part of the Application provides robust and sufficient information to allow the Scottish Ministers to grant the Application for the Offshore Development in compliance with the Habitats Regulations.

The Applicant has also provided a without prejudice Derogation Case in respect of Kittiwake (for the SPA's identified), Gannet, Razorbill and Puffin. The Applicant's submission is provided without prejudice to the Applicant's position that it can be concluded beyond reasonable scientific doubt that the Salamander Project would not give rise to AEOI, either alone or in combination with other plans or projects, in respect of those species for the SPAs identified.

Documentation enclosed

The documents submitted as part of the Salamander Offshore Wind Farm Section 36 Consent application and associated Marine Licence applications include:

- This cover letter, comprising an application for Section 36 Consent.
- A Marine Licence application and supporting information for the generating station and offshore transmission infrastructure.
- An Environmental Impact Assessment (EIA) Report (EIAR):
    - ER Volume 1: Non-Technical Summary
    - ER Volume 2: Introductory Chapters to the EIAR
    - ER Volume 3: Technical EIAR Chapters
    - ER Volume 4: Technical Appendices including Pre-Application Consultation Report
    - ER Volume 5: Supporting Visual Materials
    - ER Volume 6: Management Plans
- Report to Inform Appropriate Assessment (RIAA):
    - Apportioning Report
    - Site Specific Population Viability Analysis (PVA)
- Derogation Case Documents:
    - HRA Without Prejudice Derogation Case, Part 1-3
    - HRA Derogation Case, Compensation Roadmap
- Consent Application Accompanying Documents:
    - Benthic Features Impact Assessment Southern Trench MPA
    - Marine Mammal Impact Assessment Southern Trench MPA
- Offshore Planning Statement.

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Onshore Application

The onshore transmission infrastructure associated with the Salamander Offshore Wind Farm shall be the subject of a separate application for planning permission under the Town and Country Planning (Scotland) Act 1997 that will be submitted to Aberdeenshire Council as planning authority.

Public Notices / Advertisements

Public notices advising that the Applicant has submitted applications for a Section 36 Consent and accompanying Marine Licences to the 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 MD-LOT:

- The Press and Journal
- Fishing News
- Lloyd's List
- The Gazette (Edinburgh Gazette)
- The Scotsman

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, 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.

Once the Application has been accepted by MD-LOT, the Application documents will also be published online at www.salamanderfloatingwind.com.

Hard copies can also be made available on request. These will be subject to a reasonable charge reflective of making the relevant information available. Copies of the EIAR non-technical summary (NTS) are available free of charge. Requests for hard copies of the Application documents can be made at: info@salamanderwind.com.

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

Yours sincerely,

[redacted]

Hugh Yendole

Project Director