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Application for Section 36 Consent Cover Letter

MarramWind Offshore Wind Farm

January 2026

MarramWind Limited

FAO Kirsten Watson
Offshore Renewable Energy Projects
Consenting Leader
Marine Directorate Licensing Operations Team
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Scotland, G2 5AD
Internet: <https://www.marramwind.co.uk>

5th January 2026

Dear Kirsten,

Applications by MarramWind Limited for Consent to Construct and Operate a Generating Station, MarramWind Offshore Farm, and Associated Infrastructure

MarramWind Offshore Wind Farm (hereafter referred to as 'the Project') is wholly owned by ScottishPower Renewables (UK) Limited (SPR). MarramWind Limited, a subsidiary of SPR, is the Applicant for the Project.

The Applicant is pleased to submit an application to the Marine Directorate - Licensing Operations Team (MD-LOT), Scottish Government under Section 36 (s.36) of the Electricity Act 1989 for the construction and operation of an offshore generating station (the Project). The application covers the proposed offshore generating station with a capacity of up to 3GW, which includes the wind turbines, their floating units, mooring systems, and array cabling.

The applicant is also concurrently submitting applications for one generation marine licence and three sets of transmission marine licences for the Project. These are referred to in this document, and the supporting Offshore Planning Statement, as Marine Licence (ML) 1 to ML4, as defined below. Each marine licence application will cover both the Marine and Coastal Access Act 2009 and the Marine (Scotland) Act 2010 insofar as relevant, as agreed between the Applicant and MD-LOT during a Quarterly Project Update meeting on 18 September 2025.

Whilst all marine licence applications are being submitted to MD-LOT concurrently, the discharge of the associated conditions on individual licences is expected to occur in stages, reflecting the anticipated phased delivery of the Project.

Overview of the Project

A full description of the Project is set out in **Chapter 4: Project Description** of the Environmental Impact Assessment (EIA) Report.

The Project's offshore infrastructure, located seaward of mean high water springs (MHWS), includes the following:

- wind turbine generators (WTGs), including floating units (platforms and station keeping system);
- array cables;
- subsea distribution centres (SDC);
- subsea substations;
- offshore substations;
- reactive compensation platform(s) (RCPs) (if required); and
- offshore export cables to connect the offshore infrastructure to the landfall(s).

The Project's onshore infrastructure, located landward of mean low water springs (MLWS), includes:

- landfall(s) – the infrastructure associated with landfall(s) located above MLWS;
- underground onshore export cables running from the landfall(s) to the onshore substations;
- onshore substations co-located on one site;
- underground grid connection cables connecting the onshore substations to the grid connection point at Scottish and Southern Electricity Networks (SSEN) Netherton Hub; and
- tie-in to the grid connection point (SSEN substation at the Netherton Hub, which is a separate project and does not form part of these consenting applications).

Given the scale of the Project, a phased approach to the installation and energisation of the WTGs is proposed. Each phase of the Project will be operational for up to 35 years from completion of installation and commissioning of the offshore WTGs.

The Application is based on indicative design / parameters which will be refined at detailed design stage, based on technology available at the time of detailed design. The Application may therefore be subject to variation and refinement at a later stage.

Any s.36 consent and marine licence(s) granted for the Project at the present time will however provide a framework to underpin subsequent detailed design, supply chain and financing decisions to allow the Project to progress.

The Project infrastructure covered by the four marine licence applications is set out in Error! Reference source not found. below.

Table 1.1 Project Infrastructure per Marine Licence¹

Marine Licence	Offshore Infrastructure
ML1: for 3GW generation assets, Phases 1 - 3	<ul style="list-style-type: none"> • WTGs with floating units, anchors and moorings; • array cabling; and • subsea distribution centres.
ML2: for offshore transmission infrastructure, Phase 1	<ul style="list-style-type: none"> • 1x High Voltage Alternating Current (HVAC) offshore substation; • up to 2x HVAC export cables; • up to 2x export cable trenches; and • up to 2x landfall options at Scotstown and / or Lunderton.
ML3: for offshore transmission infrastructure, Phase 2	<ul style="list-style-type: none"> • up to 2x HVAC or 1x High Voltage Direct Current (HVDC) offshore substations; • up to 2x reactive compensation platforms (RCPs) within the export cable corridor; • up to 2x HVAC or 1x HVDC export cables; • up to 2x export cable trenches; and • up to 2x landfall options at Scotstown and / or Lunderton.
ML4: for offshore transmission infrastructure, Phase 3	<ul style="list-style-type: none"> • 1x HVDC offshore substation; • 1x HVDC export cable; • 1x export cable trench; and • up to 2x landfall options at Scotstown and / or Lunderton.

Grid connection location

The National Electricity System Operator (NESO) Beyond 2030 Report (NESO, 2024) identified the location for the full 3GW connection for the Project as being within the vicinity of Peterhead, subject to detailed siting and design work to be undertaken by SSEN as the Transmission Operator. SSEN has since identified the

¹ The Offshore Infrastructure listed in Table 1.1 is indicative and reflects the position at the time of the Marine Licence Applications.

Project's connection point as the Netherton Hub at Longside near Peterhead, which was granted PPiP by Aberdeenshire Council in August 2025.

It should be noted that whilst the Project will connect into the recently consented Netherton Hub, the latter is the subject of a separate application.

Land Rights

The Applicant intends to secure the Project's necessary land rights through voluntary agreements with affected landowners and occupiers. The Applicant is committed to continuing open engagement with affected parties in negotiating these agreements. The Project recognises the need for collaboration between developers in the Peterhead area and will continue to pursue this as required. In addition, the Project has secured a Generation Licence from Ofgem and as such will have access to powers to purchase land compulsorily, if it is deemed necessary and appropriate.

Onshore Applications

The Project's associated onshore transmission infrastructure is the subject of a separate application to Aberdeenshire Council for Planning Permission in Principle (PPiP) under the Town and Country Planning (Scotland) Act 1997.

Scoping Opinion and Report

A proactive, early-stage scoping process was undertaken in 2022-2023 to ensure that the EIA would be robust whilst suitably focused on aspects of the environment potentially subject to likely significant effects. The Applicant has provided responses to the MD-LOT Scoping Opinion (Scottish Government, 2023a), Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023a) and the Statutory Consultation responses within the EIA Report. Responses are included in the relevant EIA Report aspect chapters (**Chapters 1 to 33**).

Consultation and Engagement

The Applicant has undertaken both statutory pre-application consultation and wider stakeholder engagement to ensure meaningful dialogue with affected communities and interested parties throughout the development process.

Statutory Consultation has been delivered in accordance with the Town and Country Planning (Scotland) Act 1997, the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and the Marine Licensing (Pre-Application Consultation) Scotland Regulations 2013. Given the national development status afforded to the Project and the extended period required to bring forward a project of this scale, four rounds of pre-application consultation were held. The requirements of the relevant regulations have been addressed by the Applicant during the pre-application consultation process and are detailed within the Pre-Application Consultation Report.

The Applicant appreciates that there is likely to be engagement between MD-LOT and Aberdeenshire Council as part of the planning process, given that Aberdeenshire Council is concurrently setting conditions for determining the PPiP application associated with the onshore consent for the Project. The Applicant would be pleased to support MD-LOT and Aberdeenshire Council in any way that may assist with the coordinated determination of these applications.

Compliance with the Environmental Impact Assessment and Habitats Regulation

An EIA has been completed for the Project in accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, The Marine Works (Environmental Impact Assessment) Regulations 2017 and The Marine Works (Environmental Impact Assessment) Regulations 2007. The EIA Report (Volumes 1 to 4) has been submitted as part of this consent application.

A Habitats Regulations Appraisal (HRA) is also required pursuant to the Conservation (Natural Habitats, &c.) Regulations 1994 (up to 12 nautical miles (nm)), the Conservation of Habitats and Species Regulations 2017 (of relevance to consents under Section 36 of the Electricity Act 1989), the Conservation of Offshore Marine Habitats and Species Regulations 2017 (beyond 12 nm) (together, “the Habitats Regulations”). An Offshore Habitats Regulations Appraisal (HRA) Screening Report, Report to Inform Appropriate Assessment (RIAA) and a Derogation Case therefore accompany this s.36 consent application and accompanying marine licence applications.

Derogation Case

The Habitats Regulations establish that where the potential for Adverse Effect(s) on Site Integrity (AEoSI) of National Site Network (NSN) sites cannot be excluded, the competent authority (Scottish Ministers) may grant consent for the Project only when it is established that there are no alternative solutions, that the Project must be carried out for Imperative Reasons of Overriding Public Interest, and that the proposed compensatory measures are suitable so that the overall coherence of the NSN is maintained. These three tests form the basis for the ‘Derogation Case’, on which the Scottish Ministers must be satisfied to be able to subsequently grant consent for the Project.

The Project’s Derogation Case is presented for the NSN sites where the Project’s RIAA concludes that either an AEoSI cannot be ruled out, or where sites have been considered on a ‘without prejudice’ basis, due to the risk that Scottish Ministers may disagree with the conclusions of the Project’s RIAA.

The documents comprising the Derogation Case are the Derogation Case and the Compensation Plan, and these are included as part of this application. The information within provides robust and complete information to enable the Scottish Ministers to grant the applications for the Project in compliance with the Habitats Regulations.

Documentation Enclosed

The documentation accompanying the Project s.36 consent and associated Marine Licences applications is as follows:

- This cover letter to the s.36 consent application and associated marine licence applications;
- Four marine licence applications and supporting information;
- EIA Report:
 - Non-Technical Summary;
 - Volume 1: EIA Report Chapters:
 - Chapters 1 to 5 – Introductory Chapters;
 - Chapters 6 to 18 – Offshore Chapters;
 - Chapters 28 to 34 – Whole-Project Chapters;
 - Volume 2: EIA Report Figures;
 - Volume 3: EIA Report Appendices (including Volume 3, Appendix 5.2: Commitments Register); and
 - Volume 4: Implementation Plans.
 - Offshore Implementation Plans:
 - Outline Construction Method Statement
 - Outline Environmental Management Plan
 - Appendix 1: Outline Marine Pollution Contingency Plan
 - Outline Scour Protection Management Plan
 - Outline Piling Strategy
 - Outline Cable Plan
 - Outline Project Environmental Monitoring Programme
 - Outline Invasive Non-Native Species Management Plan
 - Outline Marine Mammal Mitigation Protocol

- Outline Fisheries Mitigation, Monitoring and Communication Plan (FMMCP)
 - Outline Vessel Management and Safety Plan
 - Outline Lighting and Marking Plan
 - Outline Written Scheme of Investigation (Offshore)
- Habitat Regulations Appraisal:
 - Report to Inform Appropriate Assessment
 - HRA Screening Assessment
 - Commitments Register
 - HRA Apportionment Report
 - HRA Population Viability Analysis Report
 - Offshore and Intertidal Ornithology In-combination Assessment
- Derogation Case Documents:
 - Derogation case
 - Compensation Plan
 - Supporting information – WTG Air Gap Supporting Document
- Consent Application Accompanying Documents:
 - Nature Conservation Marine Protected Area Assessment
 - Offshore Planning Statement
 - Pre-Application Consultation (PAC) Report
 - Safety Zone Statement
 - Nature Positive Plan
 - Socio-Economic Action Plan
 - MD-LOT Gap Analysis
 - MarramWind Scoping Report
 - MD-LOT Scoping Opinion
 - Offshore renewable energy: marine licence and section 36 consent application checklist

The required documentation to support validation of the application and licences has been submitted by the Applicant. Volume 1 Chapters 19 to 27 have not been provided as these are Onshore Chapters, however they will be available on the Aberdeenshire Council planning portal and the MarramWind Ltd website noted below.

As requested, the Applicant has populated the MD-LOT Gap Analysis and includes a copy with the submission. However, reference should be made to the EIA Report for full details of how each stakeholder comment has been addressed.

To meet submission requirements, documents have been compressed for online upload. Original high-resolution versions can be accessed via the MarramWind website (<https://www.marramwind.co.uk>), or through the physical copies provided.

Confidential Documents

The following items of the EIA Report contain confidential information and should not be placed on public facing portals, publicly accessible physical locations as a printed copy, or anywhere else in the public domain:

- **Volume 3, Appendix 10.3: Confidential Geophysical and Environmental Export Cable Corridor Survey - Benthic Survey Interpretative Report 2024.**

Public Notices / Advertisements

Public notices advising that the Project has submitted applications for a s.36 consent and accompanying Marine Licences to the Marine Directorate, 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:

- On the MarramWind application website – www.marramwind.co.uk;

- The Scotsman²;
- Edinburgh Gazette²;
- The Buchan Observer³;
- Press and Journal³ and
- Fishing News²

The adverts will advise how comments on the application can be submitted, during the public consultation period, 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 at the location detailed in **Table 1.2**.

Table 1.2: Application Hard Copies - Public

Location	Address	Opening Hours
Buchan House	St Peter Street, Peterhead AB42 1QF	Monday – Friday, 8:45 - 5pm

Once the application has been accepted by MD-LOT, the application documents will be published online at: <https://www.marramwind.co.uk/>

Hard copies can also be made available on request. These will be subject to a charge of £15 on a USB stick (including postage and packaging), or as a hard copy for an additional charge of £1000. Copies of a short non-technical summary of the EIA Report are available free of charge. Requests for hard copies of the application documents can be made at: stakeholder@marramwind.com

The Applicant trusts that all of the necessary documentation has been provided to enable MD-LOT to validate the applications. It is our understanding that the validation period will run for 2 weeks, beginning from the date of application (5th January 2026), concluding on the 19th January 2026 at the latest.

Yours sincerely,



Colin Anderson

Development Manager

² On one occasion

³ Two successive weeks

MarramWind

