Aberdeen International Airport

From:	#ABZ Safeguarding
To:	MS Marine Renewables;
Subject:	RE: SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023
Date:	27 April 2023 10:13:47
Attachments:	image670629.png image468425.png image857634.png image556626.png image372877.png image413649.png image089680.png image719973.png

This proposal is located outwith our consultation zone. As such we have no comment to make and need not be consulted further.

Kind regards

Aberdeen International Airport

#ABZ Safeguarding
abzsafeguard@aiairport.com
www.aberdeenairport.com

Aberdeen International Airport Limited, Dyce, Aberdeen, AB21 7DU

CURRENT HOLDER OF FOLLOWING AWARDS

• **Scottish Airport of the Year 2022.**

Aberdeenshire Council

Aberdeenshire COUNCIL

Our Ref: ENQ/2023/0407
Your Ref:

Ask for:
Tel:
Email: ...@aberdeenshire.gov.uk

Marine Scotland
Scottish Government
Marine Scotland
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

25 April 2023

Dear Sir/Madam

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

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

Proposed Section 36 Application and Marine Scotland Licence Applications - Scoping Request at Cenos Offshore Windfarm, 185km Off East Coast Of Scotland, Central North Sea
Grid Reference: 383265.817586

Thank you for your consultation request concerning the scoping opinion for the CENOS Offshore Wind Farm Proposal which was received on 16 March 2023. Aberdeenshire Council would again thank you for accommodating the extension of time to submit comments until 28 April 2023, this is very much appreciated.

Generally, the Council are interested in the terrestrial elements of the development, including development to the Mean Low Water Spring. The Councils comments in this instance are limited to those concerning SLVIA, Natural Heritage and Archaeology.

SLVIA

Chapter 11 of the Scoping Report notes the distance between the development area and mainland Scotland as being approximately 85km. It is also noted that existing oil and gas platforms are located a similar distance away, and few of these are visible from the

Scottish mainland. This will be due to the intervening distance and also the curvature of the earth.

The Council accepts the suggestion at paragraph 11.4 that an assessment of the impacts of the proposed windfarm on seascape, landscape and visual resources is scoped out of an EIA on the basis of the intervening distance from land and low sensitivity of seascape receptors.

Natural Heritage

As the proposed cable landing route proposes the use of already consented infrastructure of the North Connect project, and that all other infrastructure is beyond 12nm offshore, no comments are provided in relation to impacts upon biodiversity and ecology.

Archaeology

It should be highlighted that Canmore is not an appropriate tool for use in development management situations as it is infrequently updated and uses only point data. Any historic environment / cultural heritage assessment ought to include a review of data from the relevant local authority Historic Environment Record (HER) for undesignated assets and Historic Environment Scotland (HES) for designated assets. Table A-7 details data sources but excludes the local authority HER.

It is noted in Paragraph 14.4 that geophysical surveys are yet to carried out. It is recommended that the appointed archaeological consultant reviews and assesses these prior to any proposed mitigation measures being agreed. The Councils Archaeology Service suggests Cultural Heritage should remain a consideration for further assessment in an EIA.

Should you wish to discuss any matters relating to this issue please contact the above named officer.

Yours faithfully

Head of Planning and Economy

BT Group

From:	radionetworkprotection@bt.com
To:	MS Marine Renewables
Cc:	radionetworkprotection@bt.com
Subject:	RE: WID13050 ** SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023
Date:	28 March 2023 16:28:14
Attachments:	flo-cen-rep-0010_cenos_scoping_report_document_-_redacted.pdf

BT Group

-

OUR REF: WID13050

Thank you for your email dated 16/03/2023.

We have studied this proposal using the attached with respect to EMC and related problems to BT point-to-point microwave radio links.
The conclusion is that this should not cause interference to BT's current and presently planned radio network. There appears to be no new structures at height on land mentioned, if this has been missed please confirm and we will reassess.
Kind Regards

National Radio Planner
Network Planning

BT Group

Dee District Salmon Fishery Board

Dee District Salmon Fishery Board

Marine Licensing and Consenting Casework Officer
Marine Planning & Policy
Scottish Government
Marine Scotland
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

By email to MS.MarineRenewables@gov.scot
27th April 2023

Dear Sirs,

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 AND MARINE LICENCE APPLICATION FOR FLOTATION ENERGY LTD – CENOS OFFSHORE WINDFARM – LOCATED APPROXIMATELY 185KM OFF THE EAST COAST OF SCOTLAND IN THE CENTRAL NORTH SEA

On behalf of the Dee District Salmon Fishery Board (Dee DSFB) we welcome the opportunity to respond to the Cenos Offshore Wind Farm Limited - Consultation on Request for Scoping Opinion.

Designations & Conservation Status

As a statutory body charged with the protection of Atlantic salmon and sea trout stocks within its district, the Dee DSFB has a duty to ensure that there are no significant adverse impacts upon the populations of these species.

The Dee has been designated as a Special Area of Conservation under the EC Habitats Directive 92/43 EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna for Atlantic salmon (the principal species for which it receives this designation). The Dee District also supports populations of trout, eels and brook, river and sea lampreys.

Sea trout, common to all the rivers within the Dee District, are a priority species under the United Kingdom's Biodiversity Action Plan (UKBAP).

All lamprey species are protected under the EC Habitats Directive whilst river and sea lampreys are additionally protected under the UKBAP priority list.

Eels are a UKBAP priority species, critically endangered under the IUCN red list and protected under CITES.

Wild Salmon Strategy and Conservation regulations

In January 2022, the Scottish Government released its Wild Salmon Strategy which gave a clear message that there is sadly now unequivocal evidence that populations of Atlantic salmon are at crisis point. The Strategy calls on government agencies, as well as the private sector, to prioritise the protection and recovery of Scotland's wild Atlantic salmon populations.

One of the key pressures identified in the strategy is marine development, with marine renewables highlighted as having the potential to impact salmon through noise, water quality and effects on electromagnetic fields (EMFs) used by salmon for migration.

Furthermore, the Conservation of Salmon (Scotland) Regulations 2016 has led to the production of stock assessments for all Scottish salmon rivers, based on catch data. The assessments estimate whether the number of adults returning to the river in each of the previous five years will produce enough eggs to keep the population size above a critical threshold.

For the Dee, like other north-east rivers, the assessments have shown a declining trend in catches since 2011. Nonetheless, the Dee has been categorised as a Grade 1 river, meaning that the stocks have most likely been above the critical threshold - the Conservation Limit - over the last five years. It is however apparent that specific stock components, such as the Spring salmon stock on the Dee are critically low.

Assessment of the juvenile salmon stocks in the Dee through the National Electrofishing Programme for Scotland (NEPS) has evaluated juvenile stocks in the Dee as Grade 2, suggesting that there are significant issues with recruitment and survival within the catchment (Malcolm *et al* 2020). With greater pressures on marine survival such that only approximately 3% of smolts return to the river as adults, we need to address any pressures within the freshwater and marine environments to protect Dee salmon stocks.

Position

The Dee DSFB welcomes the opportunity to respond to the scoping opinion and would wish to be consulted further during this process with specific interest in the migratory fish species Atlantic Salmon and sea trout.

We note that the location of the proposed site, cable corridor and landfall are out with the Dee District Salmon Fishery Board district and that the Dee SAC is approximately 185km west from the site boundary.

We do not agree that migrating diadromous fish should be scoped out of the assessment at this stage, on the basis that there is not enough evidence to suggest that there will not be an impact from the development.

We feel that the impact of the proposed development should be fully assessed to consider the potential implication on all life stages of salmon which could be migrating through the scheme. The reference to the recent tracking research by EOWDC at Aberdeen only captures the initial migration of juvenile salmon on their outward migration from their natal rivers of the Dee and Don. Receivers were located within a complex array and grid design to identify initial direction of migration. Based on this information alone it is not sufficient to say that Atlantic salmon migration is only either in a northerly or southernly direction given the relatively short distance away from the coast which these receivers were positioned (up to 20km). Furthermore, this research relates only to juvenile outward migrating salmon and not returning adult salmon descending from the North Atlantic back to their natal rivers.

Whilst we appreciate that the distance of the proposed site is 185km from the Aberdeenshire Coast, and that it may unlikely that significant numbers of migrating diadromous fish would be present, we feel the that the precautionary principle should be applied due to the lack of evidence to the contrary. We are not aware of any research specifically or inadvertently designed which captured the level of information allowing for this assertion to be made *"This data therefore backs up the other available data that migrating diadromous fish do not migrate through the wind farm development area for Cenos due its location >200km offshore in significant numbers."* and would ask the developer to 'scope in' migrating diadromous fish to ensure that due care and consideration is given to the potential impacts from the development at each stage, Commissioning, Operation and Decommissioning.

Furthermore, we note that throughout the scoping report there is no reference to the ScotMER Diadromous Fish Specialist Receptor Group. We would therefore suggest that further consultation takes place with Marine Scotland Science and Fisheries Management Scotland with reference to broadening our understanding of any potential impact upon diadromous fish resulting of this proposed development.

Yours sincerely

Fisheries Protection Manager, Dee District Salmon Fishery Board

Edinburgh Airport

From:	Safe Guarding
To:	MS Marine Renewables
Cc:	Safe Guarding
Subject:	Scoping Opinion - Cenos Offshore Wind Farm
Date:	24 March 2023 14:40:06
Attachments:	image001.png

Good afternoon,

In respect of the above, I can confirm the location of this development falls out with our Aerodrome Safeguarding zone for Edinburgh Airport therefore we have no objection/comment.

With best regards,

Aerodrome Safeguarding & Compliance Officer

Edinburgh Airport
Where Scotland meets the world

Our values

t: m:
www.edinburghairport.com

Edinburgh Airport Limited
Room 3/54, 2nd Floor Terminal Building
EH12 9DN, Scotland

Forth Ports

From:	Carol Forman
To:	MS Marine Renewables
Cc:	
Subject:	FW: SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023
Date:	07 April 2023 11:47:24

Hi

I can confirm Forth Ports has no comments on the proposed application.

For the avoidance of doubt, where applicable, the Applicant will require a Works Licence from Forth Ports Limited prior to any works being undertaken. The applicant should also discuss the requirement or otherwise of a Notice to Mariners with Forth Ports. If required, the applicant should supply the required information to us to allow us to issue the Notice to the required distribution.

Kind regards.

| In-house Paralegal | LSS Accredited Paralegal | Forth Ports Limited
Head Office | 1 Prince of Wales Dock | Edinburgh | EH6 7DX
T: | M: | https://forthports.co.uk

Historic Environmental Scotland

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

By email to:
MS.MarineRenewables@gov.scot

Marine Scotland (Marine Renewables)
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

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

Our case ID: 300064573

27 April 2023

Dear Marine Scotland

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Cenos Offshore Windfarm, located approximately 185km off the East Coast of Scotland in the Central North Sea - Section 36 consent and marine licence applications
Scoping Report

Thank you for your consultation which we received on 16 March 2023 regarding the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs), and undesignated offshore archaeological remains within the development area.

Proposed Development
The Proposed Development would comprise a 1.4 GW offshore wind farm located in the Central North Sea and will be connected to offshore oil and gas installations and the UK mainland. Elements of the wind farm will lay within 12 nautical miles of land and will be subject to a marine licence and a Section 36 consent under the Electricity Act 1989.

Our Interests
There are no designated heritage assets within our remit within or near the proposals. There are no known archaeological assets within the planned windfarm site but there is an erroneous Canmore Maritime record for the First World War U-boat U74. The true location of the wreck is closer to the shoreline (Canmore 322289).

Section 14.3 of the Scoping Report notes that cable routes will avoid known assets with a 50 m buffer, however there is the potential for undiscovered archaeology and paleo-landscapes within the proposed development site.

Our Advice
We do not consider that the proposals have the potential to raise significant impacts on known or designated heritage assets within our remit. However, there is potential for direct impact and indirect impacts on undiscovered remains within the proposal, and for

indirect impacts on known remains in the vicinity of the proposal. Further information and comments on the scoping report are included in the annex below.

Further information
Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at https://conservation.historic-scotland.gov.uk/.
We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Sam Fox and they can be contacted by phone on 0131 668 6890 or by email on samuel.fox@hes.scot.

Yours faithfully

Historic Environment Scotland

Annex

Scoping Report

We note that the assessment in the scoping report is desk-based only, and that survey is planned as part of the project. However, the report (Section 14.4) states that as there are no known archaeological assets in the Project area, there is no need for an impact assessment. Section 14.4 further states that if archaeological or geomorphological features are found that the Project could interact with (on or in the seabed) then, where practicable, they will be avoided with a suitable buffer zone. If a feature is unable to be avoided, then it would be taken forward for an impact assessment and if appropriate a Written Scheme of Investigation (WSI) will be proposed and agreed.

We do not agree with this approach, or with the conclusion that no impact assessment is required. It is not appropriate to reach this conclusion in advance of appropriate assessment of survey results as there is insufficient baseline data.

We recommend that appropriate mitigation should be embedded into the scheme rather than introduced if remains are encountered. As part of this, we would highlight the requirement for the preparation of a project specific Written Scheme of Investigation (WSI) with a Protocol for Archaeological Discoveries (PAD). These should be produced by persons with an appropriate archaeological qualifications and experience.

The WSI should detail the survey to be undertaken within the proposal area (including cable routes) to ensure the data collected will be of a standard to enable archaeological interpretation and should make provision for interpreting the results of that survey.

Supplementary WSIs should be produced where appropriate for specific works, for example OXO and boulder clearance. Guidance on production of WSIs for Offshore Windfarm Projects can be found here: guide-to-archaeological-requirements-for-offshore-wind.pdf (thecrownestate.co.uk).

The desk-based assessment has not identified remains within the proposal area. However, should relevant remains be identified during the survey, an impact assessment should be made at that time. The assessment should include both direct and indirect impacts and should include the cable routes.

An assessment of indirect impacts on known remains in the vicinity of the proposal has not been included and should be incorporated.

We also note that there is the potential for cumulative impacts on the setting of terrestrial heritage assets caused by the development of this wind farm in combination with other existing and proposed off-shore wind farms in the area. We would recommend that

cumulative impacts on designated terrestrial heritage assets within our remit are considered as part of the EIA assessment.

Mitigation
The report states that remains will be avoided with a buffer zone of at least 50 metres. We support the principal of using buffer zones, but more detailed consideration of the potential impacts on remains is required and in some cases larger buffer zones may be required. Mitigation to avoid impacts on remains should be outlined in the WSI. This might be through establishment of Archaeological Exclusion Zones (AEZs) and re-routing of cables.

Historic Environment Scotland
27 April 2023

Hywind (Scotland) Limited

Hywind (Scotland) Limited

Marine Scotland - Marine Planning & Policy
Scottish Government
Marine Scotland
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Email: MS.MarineRenewables@gov.scot

13th April 2023

Reference: Flotation Energy Ltd – Cenos Offshore Windfarm Section 36 Consent and Marine Licences Application Consultation – Hywind Scotland Representation

This representation is made by Hywind (Scotland) Ltd in response to Marine Scotland's email dated 16 March 2023 in relation to the Flotation Energy Ltd – Cenos Offshore Windfarm (the "Applicant") Section 36 Consent and Marine Licences application. Hywind Scotland has been identified as a potential interested party due to its proximity to the proposed Cenos offshore wind farm and due to Cenos's offshore export transmission assets proposed crossing of the Hywind Scotland operating export transmission cable.

Hywind Scotland Ltd is an Equinor operated offshore wind farm comprising 5 x 6MW floating wind turbines 25 km offshore close to the Buchan Deep, with an offshore export transmission cable making landfall in Peterhead, Aberdeenshire. Hywind Scotland has been operation since 2017 and was the world's first commercial scale floating offshore wind farm. Hywind Scotland Ltd is owned by Equinor New Energy Limited 75% and Masdar Offshore Wind Scotland Limited 25%.

All three of the proposed Cenos offshore export cable route alternatives overlap with the existing operational offshore export cable of Hywind Scotland. Hywind Scotland has subsequently reviewed the Offshore Scoping Report/Offshore Environmental Impact Assessment. This letter forms the initial representation to the proposal.

The main point of concern is the potential crossing and close proximity of the Applicant's offshore export cable routes, which proposes to cross Hywind Scotland's operational offshore export cable near Peterhead. Hywind Scotland may make further representations once further information is obtained.

Hywind Scotland is the holder of a Bilateral Embedded Generation Agreement (BEGA) under the Electricity Act 1989. Hywind Scotland note that there are generic protective provisions for Electricity Act 1989 statutory undertakers.

Issues to be resolved:
Hywind Scotland considers that the two schemes can co-exist and therefore does not have an in-principal objection to the Application. However, as Hywind Scotland is currently in operation, it is crucial that the Application does not prohibit the operation.

Hywind (Scotland) Ltd | Company no.08709450
One Kingdom Street, London W2 6BD, England, UK
Phone: +44 (0) 203 204 3200, Fax: +44 (0) 203 204 3600
Email: gm_hywindsccomsec@equinor.com

Masdar A MUBADALA COMPANY | equinor

Hywind Scotland has identified a number of issues that need to be resolved to ensure that no serious detriment is caused to Hywind Scotland. Hywind Scotland will provide a full account of the issues and measures that require the Applicant to resolve once the proposed plans have been reviewed.

In the meantime, Hywind Scotland shall engage with the Applicant to agree provisions to address the following:

i. Provisions relating to the timing and coordination of construction works including:
   a. construction program (estimated timeline of completion of cable crossing operation)
   b. construction mitigation measures including discharge of any requirements;
   c. subsea and ecological measures including discharge of any requirements;
   d. subsea investigations;
   e. liaison between contractors (including monitoring, communication, and emergency protocols); and
   f. community liaison and complaints procedure.
ii. Provisions relating to the timing of consent.
iii. Greater specificity in respect of when thermal interaction alone will not be a reasonable objection, i.e. by reference to parameters above which thermal interaction would nevertheless be a reasonable objection;
iv. Provisions relating to the payment of any additional costs;
v. An indemnity for any loss or damage; and
vi. Provisions relating to dispute resolution prior to arbitration (e.g. internal escalation) and reference to another party and not the Secretary of State in the event that an arbitrator cannot be agreed.

The Offshore Scoping Report/Offshore Environmental Impact Assessment submitted by the Applicant does not refer to entering into a crossing agreement. Hywind Scotland will require a crossing agreement be put in place with the Applicant to Hywind Scotland's reasonable satisfaction.
Additional Information requested:

- Hywind Scotland wishes to engage to improve its understanding of the construction activities that the Applicant is proposing to undertake and any permanent operational apparatus to be installed within the overlapping area so it can be understood whether such activities will have an impact on the operation, maintenance and decommissioning of Hywind Scotland's cable route.
- Hywind Scotland would also like to understand whether there is likely to be any temporal overlaps relating to any survey or construction activities.

Hywind Scotland will work with the Applicant to facilitate agreement between the parties to ensure both projects can co-exist. Hywind Scotland looks forward to further engagement with the Applicant on these and any other matters that may arise.

Yours sincerely,

William Munn (916491) equinor

Plant Manager Hywind Scotland Wind Farm

Hywind (Scotland) Ltd | Company no.08709450
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Phone: +44 (0) 203 204 3200, Fax: +44 (0) 203 204 3600
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Marine Scotland Marine Analytical Unit

marinescotland

Cenos Offshore Wind Farm Scoping Report

Marine Analytical Unit Response

The Cenos Offshore Wind Farm scoping report includes descriptions of a range of potential impacts. This response focuses only on the assessment of social and economic impacts.

We recommend that a full Socio-Economic Impact Assessment be scoped into the Environmental Impact Assessment. We provide general advice on how to deliver this at Annex 1.

Overview

The socio-economic section of the scoping report is quite high level and there is not very much information about the approach to the assessment or the approach to the decisions made. The development is quite far offshore and linked to an existing oil and gas development, however the development consists of 70-100 turbines generating 1.4 GW of power and so is not small, and the socio-economic impacts could be significant.

A lot of the data presented in the baseline section is at Scotland or UK level, and so is not especially useful for understanding potential impacts of the project. The developers also state that, in the absence of local data, they will assume that host communities have the characteristics of Scotland as a whole. This does not seem to be a valid assumption.

The impacts identified in the socio-economic chapter have all been scoped in, but the range of impacts included is very narrow, focusing exclusively on employment, GVA and demand for housing, accommodation and local services.

Impacts not considered

Potential impacts on tourism and recreation have not been considered, neither have socio-cultural impacts or distributional impacts.

As these impacts have not been considered at all, we have not been presented with a justification for their exclusion. We would, therefore, like these impacts to be scoped in. A more detailed description of the potential impacts that could arise, is presented in the Annex.

For clarity, we would define those impacts as follows:

- Tourism and recreation includes any changed that would affect the enjoyment or revenue from recreation or tourism assets in the area
- Socio-cultural impacts are any potential impacts on lifestyle, family structure, social problems (such as crime deprivation), human rights, community character etc.
- Distributional impacts are the potential for the Project to impact specific groups within a society (including different age groups, religious groups and ethnic minorities) or communities which are defined by their geographic location.

Knock on social impacts
A number of impacts identified in other chapters of the report could have knock on socio-economic impacts. These include: Commercial Fisheries, Cultural Heritage and Human health.

Impacts on human health have been scoped out. However the information and rationale given for excluding these impacts is not very robust. It is also not clear who is being consulted to comment on this chapter, as a list of consultees has not been provided. If these impacts are scoped in, we would like potential knock on social impacts to be included in the EIA.

Economic Impacts
We broadly agree with the proposals in the scoping report to assess the economic impact in terms of GVA and employment. For employment, the types of jobs and how these compare to the study area will be important to consider as well as the overall FTE impact. The assessment should include direct, indirect and induced impacts and take account of deadweight, leakage, displacement and substitution. Sensitivity analysis to account for risk, uncertainty and optimism bias should also be considered. Please see Annex 1 for more advice.

The scoping report does not provide detailed information on the specific methodology that will be used for economic impacts. We expect to see a detailed description of the methodology used to assess economic impacts in the EIA, including specific details about the methodological approach taken and any key assumptions that underpin any estimates. This may be supplied in a technical annex if necessary.

Onshore and offshore components
The scoping report focuses on the impacts generated by the offshore components of the OWF. However, in section 15.5.1 describing the local study area, the report states that "Local study areas will be determined where the majority of socio-economic effects from both onshore and offshore project activities are expected to accumulate".

It is, therefore, not clear whether the onshore and offshore impacts are being considered together. If so, we would like the potential social impacts associated with traffic, noise, air pollution, cultural heritage, landscape and visual amenity and land use to be included in the socio-economic chapter of the EIA.

Study area
The report states that it is not possible to determine the location of ports, construction yards, operation centres and other epicentres of impact at this stage. They also discuss regional study areas.

It is not clear whether they expect the location of epicentres to be known when the EIA is carried out. If this is the case, we would welcome that development and expect primary data to be collected in relevant areas, in order to gather local information about potential impacts.

We understand that at the point of applying for a license the developers may not know which ports or landfall locations they will use, nor where they will source their workforce from. Without this information it is difficult to plan primary research and provide a detailed assessment of social impacts. Nevertheless we expect transparency on what has the potential to significantly impact but which cannot be assessed fully due to a lack of sufficient detail.

Engagement

There is very little information about the engagement that has taken place to date, or the engagement that is planned in the future. The report mentions that there will be a Project Communications Plan, but there is no detail about what this will include.

We recommend including a detailed plan of the future engagement activities, including who will be engaged with, in what way and on what topics, socio-economic impacts should be the focus of some of this engagement. We also recommend that a Community Liaison Officer is appointed to ensure effective communication and engagement with relevant stakeholders and communities in the future.

Conclusion

- We recommend that a full socio-economic impact assessment is scoped in, and that this should include tourism and recreation, socio-cultural effects, distributional impacts, and the knock on social impacts of impacts to other receptors such as commercial fisheries, cultural heritage and human health.
- We suggest more clarity on whether the offshore and onshore components are being considered together, and if they are, we suggest the knock on social impacts of impacts to the human environment such as traffic, noise, landscape and visual amenities to be included in the socio-economic impacts assessment.
- We recommend a more detailed engagement plan, including who will be engaged with, on what topics, and in what way. We expect the outcome of these engagement activities to be included in future assessments.

We understand that at the point of applying for a license the developers may not know which ports or landfall locations they will use, nor where they will source their workforce from. Without this information it is difficult to plan primary research and provide a detailed assessment of social impacts. Nevertheless we expect transparency on what has the potential to significantly impact but which cannot be assessed fully due to a lack of sufficient detail.

Annex 1: General Advice for Socio-Economic Impact Assessment Marine Analytical Unit, December 2022

This document sets out some suggestions for delivering socio-economic impact assessment drawing on the professional expertise of the Marine Analytical Unit.

Section 1. Some general best practice tips

- Take a proportionate approach to SEIA in line with the size and generating capacity of the development
- Consider offshore and onshore components of the development in the same assessment.
- Employ experts to design and carry out the assessment. The relevant expertise would include:
    - Social research and economist training, qualifications and experience
    - Familiarity and experience with appropriate methods for each discipline (including economic appraisal, social research methods such as surveys, sampling, interviews, focus groups and participatory methods)
- Consider potential secondary socio-economic impacts of any changes the affect the other relevant receptor groups covered in the wider EIA e.g. commercial fisheries, cultural heritage and archaeology and visual impacts.
- Include consideration of the cumulative impact of multiple offshore developments.
- Outline the rationale for scoping out impacts that are deemed to be minimal, including any evidence or analysis that has been used. If this is not provided it can be difficult for MAU to understand why impacts have been scoped out and we may suggest scoping them back in.

Section 2. Key components of a Socio-economic Impact Assessment

We set out below what we consider to be the key steps to an assessment. We recommend a combined approach so that social and economic impacts are covered together in the assessment, whilst acknowledging that different methodologies for social and economic impacts assessment are needed at certain stages, and that the two disciplines are distinct.

We wish to highlight the importance of stakeholder engagement throughout the assessment, and the use of social research methods to gather primary data and first hand perspectives from particular groups and communities that are affected. These are helpful in order to better understand the nature and degree of impacts that might be caused by changes that are expected occur. A change in itself may or may not bring about tangible impact, impacts may vary for different people or be perceived in different ways, are affected by individual values and attitudes, and conditioned by the context.

Stakeholder engagement and data collection can occur at a number of stages in the SEIA process and may involve similar methodologies but there are important differences to note. The primary aims of stakeholder engagement are to inform, consult or involve key stakeholders, and to communicate information and gather

feedback. Data collection, in contrast is a more rigorous analytical process involving:

- Setting out a planned methodology in advance with clear objectives of what you wish to achieve through data collection
- Sampling strategies that take account of the demographic variations in the population and the need to include difficult to reach groups
- Robust methods to collect information from people in a neutral and unbiased way
- Awareness of how data will be analysed and reported on to obtain and disseminate robust conclusions
- Taking account of research ethics including informed consent, and data protection requirements under GDPR

The stages below are divided into the activities that we suggest are **before** the developer submits a request for a scoping opinion and those that are done **after** the scoping phase. We recommend an iterative approach which means that steps inform each other, information is built up over time, and some steps may be repeated or done in a different order.

The key steps should include:

Pre-scoping activities

1) **Getting started:** Employ economist and social research experts and work with them to develop a plan for the SEIA that sets out data requirements, and the proposed social and economic data collection and impact assessment methodologies, timescales, any data protection considerations, risk assessment and ethical issues that might arise from the work.

2) Develop a **detailed description** of the planned development and consider the project phases where socio-economic impacts might be experienced (covering development, construction, operation and maintenance and decommissioning phases). Start to map out potential socio-economic impacts and initial consideration of areas of impact on land that will need to be covered.

3) **Initial scoping of impacts:** develop a broad list of potential impacts informed by experts (including social researcher, economist, local representatives from key groups, community stakeholders and others).

4) Define potential impact areas on land taking into account locations and connections between activities. Different types of impacts may be experienced at different geographic levels, some in the area nearest the landfall or the nearest coastline to the development at sea, and others much further away (at Scotland level, UK level and internationally). The geographical scale at which social impacts are experienced may be different for social impacts compared with economic impacts. There may be multiple epicentres from which impacts radiate including the site of the development, land-based areas such as landfall and grid connections, construction bases and places from which the development is visible. Activities that take place in the sea are also relevant for defining the impact area on land, for example the location of fishing activity and ports where

fish are landed. The definition of the impact area will inform which communities and which sectors are included in the assessment and vice versa, so this exercise needs to be done iteratively with step 3, the initial scoping of impacts.

5) **Stakeholder mapping** is required to identify all the people, groups and stakeholders who may be affected by the development and is a first step in order to conduct effective stakeholder engagement. This exercise is informed by the definition of the impact area. A broad approach is recommended. Stakeholders are likely to include local communities, businesses, workers, other users of the sea, interest groups, community councils and so on.

   Steps 4 and 5 may lead to a change in the list of potential impacts so this will need refined/checked.

6) **Stakeholder engagement (with those affected by the development, sea users, communities etc)** is a key requirement of SEIA that is done at different stages of the process. We recommend doing some initial stakeholder engagement before submitting the scoping report. Stakeholder engagement will fulfil a number of requirements:

   - **Provide information about the development** so that those who might be affected are able to make an informed judgement about potential impacts

   - **Present and refine list of potential impacts based on feedback** - identify impacts that are most relevant and add any additional ones that are identified

   - **Collect initial data/ insights from stakeholders** on what potential socio-economic impacts (to be developed later)

   - **Build relationships** with the community and key groups affected for later stages of the SEIA process so that they can understand the decisions making process and how they can influence it.

   There are many **participatory methodologies** that can be used for effective stakeholder engagement that provide a deliberative space for community discussions.

   This stage may also require the setting up of governance structures and a community liaison officer. **Early engagement** with those who might be affected is very important, as is meaningful and inclusive engagement where people feel that they are being listened to and that their feedback will be acted upon. It is important to set out clearly how stakeholder engagement is being done for the SEIA specifically.

7) **Gather contextual information** to develop a social and economic profile of the area prior to the development that will help with setting the baseline and impact prediction, identifying potential industries and communities that might be affected and sources of data that can be used in the assessment. This might include primary data collection using social research methods (such as surveys,

interviews, focus groups) as well as desk based analysis (of existing data sets such as fishing data, population data).

Primary data collection may occur alongside participatory activities (e.g. engagement events) but must be done in a rigorous and systematic fashion and the findings should be robustly analysed and incorporated into the SEIA. Impacts that are identified for the other receptors in the wider EIA may also have socio-economic consequences and so it may be important to include these in the SEIA.

8) **Produce list of anticipated impacts to be covered in the scoping report** setting out the range of potential impacts that could occur, building on what has already been done using data and insights that have been collected from various activities described above. Details of the methods that have been used should be included to enable Marine Scotland to determine if the analysis is based on a robust and appropriate approach. Justification should be provided for any impacts that are scoped in or out. This could be based on suggestions made by stakeholders and the public during stakeholder engagement or an assessment based on the analysis of primary and secondary data.

   It is helpful if the scoping report includes details on the approach to be used for the SEIA including methods for data collection, planned stakeholder engagement activities and data-sets to be used.

Post scoping activities for the SEIA

The scoping opinion will advise on the final list of socio-economic impacts to be assessed in the SEIA. This may require additional data collection/ social research to enable a more rigorous assessment of a narrower set of anticipated impacts. It may also require further stakeholder engagement in order to check the significance of impacts with different groups, and the acceptability of mitigation options.

The data and information that has been collected throughout the scoping phase will be used to conduct steps 9, 10 and 11 below.

9) **Conduct baseline analysis** to assess the situation in the absence of the development, to provide a point of comparison against which to predict and monitor change. Appropriate social and economic measures should be used for the baseline and cover relevant issues (see section 4 for suggested data sources). Key stakeholders and other interested parties including affected communities and sectors may be aware of baseline data to be included, and this can be explored in the participatory approaches described above. The findings from social research can also be included in the baseline. Note that baseline data can be presented in the scoping report but is also the first stage of the SEIA and so should be included in the SEIA report.

10) **Predict impacts and assess their significance (otherwise known as impact appraisal or options appraisal):** Through analysis, estimate the social and economic changes and their expected impacts, considering any alternative development options and how significant the impacts might be. This is the core part of the assessment and forms the main part of the assessment report.

Different methodologies and both primary and secondary data inform this part of the exercise.

Different phases of the development should be covered (development, construction, operation and maintenance) and also transitions between phases (if relevant).

The knock on socio-economic consequences of impacts in other parts of the EIA assessment should be assessed here, such as the impact on commercial fisheries, and impacts on related industries such as tourism could also be included.

It is important to consider distribution of impacts among different social groups (covering protected quality characteristics, socio-economic groups and geographic area where relevant to do so).

Economic impact appraisal should include consideration of:

- Direct, indirect and induced impacts
- Leakage, displacement and substitution effects
- Deadweight
- Cumulative impacts
- Sensitivity analysis to account for risk, uncertainty and optimism bias

There are a range of methodologies for calculating direct, indirect and induced impacts. These include the appropriate use of multipliers, a local content methodology, stakeholder involvement and expert opinion.
Modelling approaches should be realistic, based on robust data, and avoid over promising the economic impacts
All prices should be presented in real terms (excluding inflation) and should state which year the prices represent.

11) **Development enhancement, mitigation strategy and complete SEIA report.**

There may be an opportunity for adaptation or other approaches to mitigate potentially adverse impacts and to maximise positive opportunities. This may include engagement with the community to develop a strategy for enhancing benefits and mitigating against impacts; or development of a Community Benefit Agreement (CBA). Again these activities should be done collaboratively with stakeholders where relevant and appropriate.

The SEIA report should clearly set out the methods used in the assessment, justification for decision made such as scoping certain impacts in or out of the assessment, and the approach to analysis. The report should cover the baseline analysis and results of the impact prediction or appraisal, and distributional impacts . Social and economic impacts can be set out separately (where this makes sense) and together where they overlap.

It is good practice for the report to be reviewed by the people (i.e. the wider group of stakeholders and communities) who were involved in providing data for its production.

Section 3. Examples of different types of socio-economic impacts

In the literature social and economic impacts are defined in many different ways. Sometimes social and economic impacts are covered separately, whilst other sources refer to socio-economic impacts.

The following table sets out some commonly identified socio-economic impacts.

Examples of Socio-economic Impacts from Glasson 2017[1]

1. Direct economic:

- GVA
- employment, including employment generation and safeguarding of existing employment;
- characteristics of employment (e.g. skill group);
- labour supply and training; and
- other labour market effects, including wage levels and commuting patterns.

2. Indirect/induced/wider economic/expenditure:

- employees' retail expenditure (induced);
- linked supply chain to main development (indirect);
- labour market pressures;
- wider multiplier effects;
- effects on existing commercial activities (eg tourism; fisheries);
- effects on development potential of area; and

3. Demographic:

- changes in population size; temporary and permanent;
- changes in other population characteristics (e.g. family size, income levels, socio-economic groups); and
- settlement patterns

4. Housing:

- various housing tenure types;
- public and private;
- house prices and rent / accommodation costs;
- homelessness and other housing problems; and
- personal and property rights, displacement and resettlement

[1] Glasson J (2017a) "Socio-economic impacts 2: Overview and economic impacts" in Therivel R and Wood G (eds.), Methods of Environmental and Social Impact Assessment, Abingdon: Routledge

5. Other local services:

- public and private sector;
- educational services;
- health services; social support;
- others (e.g. police, fire, recreation, transport); and
- local authority finances

6. Socio-cultural:

- lifestyles/quality of life;
- gender issues; family structure;
- social problems (e.g. crime, ill-health, deprivation);
- human rights;
- community stress and conflict; integration, cohesion and alienation; and
- community character or image

7. Distributional effects:

Distributional analysis is a term used to describe the assessment of the impact of interventions on different groups in society. Interventions may have different effects on individuals according to their characteristics such as income level or geographical location

- effects on specific groups in society (eg: by virtue of gender, age, religion, language, ethnicity and location); environmental justice

Section 4: Useful Data Sources for Socio-Economic Impact Assessments

Name	Summary	Link to Source
Statistics.gov.scot	Contains a wide range of data by local authority and other geographic breakdowns. Has a search by subject and area option.	statistics.gov.scot
Marine Economic Statistics, 2019	Annual economic statistics publication including GVA and employment data for marine economy sectors.	Scotland's Marine Economic Statistics 2019 - gov.scot (www.gov.scot)
Scottish Sea Fisheries Statistics, 2021	Provides data on the tonnage and value of all landings of sea fish and shellfish by Scottish vessels, all landings into Scotland, the rest of the UK and abroad, and the size and structure of the Scottish	Summary - Scottish Sea Fisheries Statistics 2021 - gov.scot (www.gov.scot)

	fishing fleet and employment on Scottish vessels.	
Scottish Shellfish Farm Production Survey 2021	Statistics on employment, production and value of shellfish from Scottish shellfish farms.	Scottish Shellfish Farm Production Survey 2021 - gov.scot (www.gov.scot)
Scottish Annual Business Statistics 2020	Scottish Annual Business Statistics (SABS) presents estimates of employment, turnover, purchases, Gross Value Added and labour costs. Data are provided for businesses that operate in Scotland. Data are classified according to the industry sector, location and ownership of the business.	Scottish Annual Business Statistics 2020 - gov.scot (www.gov.scot)
Sub-Scotland Economic Statistics Database	The Sub-Scotland Economic Statistics Database provides economic, business, labour market and population data for Scotland, and areas within Scotland.	Sub-Scotland Economic Statistics Database - gov.scot (www.gov.scot)
Nomis Official Labour Market Statistics	Labour market statistics including data on employment, unemployment, qualifications, earnings etc.	Nomis - Official Labour Market Statistics (nomisweb.co.uk)
Economics of the UK Fishing Fleet 2020	Economic estimates at UK, home nation and fleet segment level for the UK fishing fleet. The estimates are calculated based on samples of fishing costs and earnings gathered by Seafish as part of the 2020 Annual Fleet Economic Survey.	Economics of the UK Fishing Fleet 2020 — Seafish

Scotland's Census, National Records of Scotland	Census data that provides information about the characteristics of people and households in the country.	Scotland's Census | National Records of Scotland (nrscotland.gov.uk)
Scottish Index of Multiple Deprivation	Collection of documents relating to the Scottish Index of Multiple Deprivation - a tool for identifying areas with relatively high levels of deprivation.	Scottish Index of Multiple Deprivation 2020 - gov.scot (www.gov.scot)
The Green Book	HM Treasury guidance on how to appraise and evaluation policies, projects and programmes.	The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk)
The Magenta Book	HM Treasury guidance on evaluation. Chapter 4 provides specific guidance on data collection, data access and data linking.	The Magenta Book - GOV.UK (www.gov.uk)
Enabling a Natural Capital Approach (ENCA)	Supplementary guidance to The Green Book. ENCA resources include data, guidance and tools to help understand natural capital and know how to take it into account.	Enabling a Natural Capital Approach (ENCA) - GOV.UK (www.gov.uk)

Section 5: Further sources of guidance:

HM Treasury guidance on how to appraise and evaluate policies, projects and programmes: The Green Book: appraisal and evaluation in central government

Best practice in Social Impact Assessment according to the International Association for Impact Assessment: Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects

The project A two way Conversation with the People of Scotland on the Social Impacts of Offshore Renewables (CORR/5536) has developed elements of a conceptual framework on social values that can be used to support and inform existing processes for assessing the potential social impacts of offshore renewables plans: Offshore renewables - social impact: two way conversation with the people of Scotland

Best practice guidance for assessing the socio-economic impacts of OWF developments: Guidance on assessing the socio-economic impacts of offshore wind farms (OWFs)

Marine Directorate – Science, Evidence, Data and Digital (formerly Marine Scotland Science).

T: +44 (0)131 244 2500
E: MSS_Advice@gov.scot

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

18 April 2023

FLOTATION ENERGY LTD - CENOS OFFSHORE WINDFARM - SCOPING ADVICE

Marine Scotland Science (MSS) have reviewed the request from MS-LOT and provide the following advice.

Commercial fisheries

Consultation

MSS welcome engagement with the Scottish Fishermen's Federation (SFF) to support the EIA process however MSS recommend also engaging with other fisheries associations such as the Scottish White Fish Producers Association (SWFPA) and the Regional Inshore Fisheries Groups (RIFGs) to ensure wide engagement with fisheries stakeholders.

Data and maps

MSS advise that the commercial fisheries assessment for the EIA would benefit from the addition of AIS data and MMO/Marine Scotland surveillance sightings data. These would help to further improve the baseline fisheries data for the study area.

MSS advise that important fishing areas should be mapped and considered along with other technical and environmental constraints within the cable corridor routing considerations (Section 2.5.7).

Potential impacts

MSS are content with the proposed potential impacts considered for each stage of the project development in relation to commercial fisheries. However, MSS advise that potential impacts to commercial fish stocks are also assessed.

Proposed assessment

MSS note that the developer has proposed that the EIA only focuses on the effects associated with increased vessel traffic and does not include the effects associated with reduced access, exclusion and displacement since effects are not expected to be significant for the project. MSS disagree with this proposal at this stage of the process as despite low levels of commercial fishing activity in the project area, the area of reduced access or exclusion for the project has yet to be determined based on floating turbine type, radius of the mooring lines and turbine spacing. MSS advise that the effects

associated with reduced access, exclusion and displacement are included in the EIA for both the project area and cable corridor.

Mitigation

MSS note that the developer states that any rock will be laid in a profile suitable for over trawling, specifically to reduce the likelihood of gear snagging and will be over trawlable. MSS advise that the developer provides clarification on how they will ensure their rock berms are over trawlable without a post-laid cable over-trawl survey.

Yours sincerely,

Renewable Energy Environmental Advice group
Marine Scotland Science

Maritime and Coastguard Agency

Maritime and Coastguard Agency
UK Technical Services Navigation

www.gov.uk/mca
05 April 2023

Marine Scotland - Marine Planning & Policy
Scottish Government, Marine Laboratory
375 Victoria Road,
Aberdeen, AB11 9DB

Dear Sir/Madam

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007. THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

Scoping Opinion Consultation Response: Cenos Floating Offshore Windfarm.

Thank you for the opportunity to comment on the Scoping Report for the Cenos floating offshore wind farm submitted by Floatation Energy. The MCA has reviewed the report, as detailed in your email dated 16 March 2023. The MCA's remit for offshore renewable energy development is to ensure that safety of navigation is preserved whilst progress is made towards government targets for renewable energy.

The EIA Report should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:

- Collision Risk
- Navigational Safety
- Visual intrusion and noise
- Risk Management and Emergency response
- Marking and lighting of site and information to mariners
- Effect on small craft navigational and communication equipment
- The risk to drifting recreational craft in adverse weather or tidal conditions.
- The likely squeeze of small craft into the routes of larger commercial vessels.

A Navigational Risk Assessment (NRA) will need to be submitted in accordance with MGN 654 (and MGN 372 Amendment 1) and the MCA's Methodology for Assessing the Marine Navigation Safety & Emergency Response Risks of Offshore Renewable Energy Installations (OREI). This NRA should be accompanied by a detailed MGN 654 Checklist which can be downloaded from the MCA website at https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping

I note, in Section 12.1 that the project intends to carry out a vessel traffic survey to the standard of MGN 654 i.e. at least 28 days which is to include seasonal data (two x 14-day surveys) collected from a vessel-based survey using AIS, radar and visual observations to capture all vessels navigating in the study area.

The turbine layout design will require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. If a ‘worst-case’ layout is used within the NRA, the applicant should ensure it is a realistic layout design that complies with MGN 654 guidance. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.

Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g. rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location.

Consideration of electromagnetic deviation on ships' compasses should be included within the assessment. We note that in section 9.3.2 it is mentioned that compass deviations because of cables are expected to be less than 5 degrees. The MCA would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five degrees should be attained. If an HVDC cable is being used, we would expect a desk based compass deviation study conducted based on the proposed cable parameters. The MCA may request a deviation survey post the cable being laid.

Under section 2.5 we note that the applicant mentions ‘marking buoys and lighting to meet MCA and CAA criteria, we would like to point out that NLB as the General Lighthouse Authority will also be involved in this process.

Under section 12.4, regulatory mooring expectations is identified as a potential mitigation and I can confirm this guidance should be followed and that a Third-Party Verification of the mooring arrangements will be required.

Particular consideration will need to be given to the implications of the site size and location on SAR resources and Emergency Response Co-operation Plans (ERCoP). Attention should be paid to the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)) that can cover the entire wind farm sites and their surrounding areas. A SAR checklist will also need to be completed in consultation with MCA.

The applicant has referred to MGN 372 (2008) within section 12.5 Proposed Assessment, we would like to point out that MGN 372 Amendment 1 (2021) is the latest version of this document.

We also note that the applicant has Scoped In Cumulative& Transboundary impacts under section 21. We would encourage the applicant to undertake a cumulative assessment within their Navigation Risk Assessment regarding the overall reduction in navigable sea room as result of the windfarm developments in the area, particularly other INTOG and Scotwind projects.

MGN 654 Annex 4 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report

the survey or conduct it to Order 1a might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose.

On the understanding that the Shipping and Navigation aspects are undertaken in accordance with MGN 654 and its annexes, along with a completed MGN checklist, MCA is likely to be content with the approach. As this project progress, we would welcome engagement with the developers, and early discussion on the points raised above.

Yours faithfully,

Navigation Policy Advisor

Ministry of Defence - Defence Infrastructure Organisation

Defence Infrastructure Organisation

Safeguarding Manager
Ministry of Defence
Safeguarding
Department Kingston
Road
Sutton Coldfield
West Midlands B75 7RL
United Kingdom

Telephone [MOD]:

E-mail:

Your Reference: SCOP-0022

Our Reference: DIO10058765

Scottish Government
Marine Scotland
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

21 June 2023

Dear ,

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

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (collectively referred to as the "EIA Regulations").

Flotation Energy Ltd – Cenos Offshore Windfarm – located approximately 185km off the East Coast of Scotland in the Central North Sea

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping Opinion request in respect of the Cenos Offshore Windfarm Wind development received by this office on 16 March 2023.

I write to confirm the safeguarding position of the MOD on the information that should be provided in the Environmental Statement to support any application.

The applicant has prepared an Environmental Impact Assessment Scoping Report of the proposed development. This recognises some of the principal defence issues that will be of relevance to the progression of the proposed development.

The developer is proposing to develop a floating wind farm to facilitate decarbonization of the oil and gas industry through the electrification of offshore oil and gas installations, while also providing renewable power to the UK grid. The Cenos wind farm is located on flat seabed 185km off the East Coast of Scotland in the Central North Sea. It is proposed to deploy up to one hundred floating wind turbines with a maximum blade tip height of 352 metres above mean sea level and a generation capacity of up to 20 MW per turbine. The wind turbines will be installed on floating substructures which are connected by mooring lines to anchors in the seabed used to hold position. Electricity from each wind turbine will be exported via array cables to the offshore electricity hub which will be located on a bottom fixed platform.

The use of airspace for defence purposes in the vicinity of the proposed development have been appropriately identified and considered. The Scoping Report considers some of the aviation and radar systems that may be affected by the proposed wind farm. The MOD is correctly identified as a relevant receptor in Section 20 Aviation Consideration of the Scoping Report.

The potential for the development to be detectable to, and potentially affect, the operation of radar systems has been assessed. No MOD radars are identified within the submitted Scoping Report as being affected by the proposed wind farm, an initial assessment indicates no reason for the MOD to dispute this position.

The physical effect of introducing a tall structure on military low flying has been scoped in and the applicant states in the Scoping Report that they are committed to lighting and charting the turbines. In the interests of air safety, the MOD would request that the development be fitted with MOD accredited aviation safety lighting. As a minimum the MOD would require that each of the turbines are fitted with 25cd visible or infra-red (IR) lighting.

The potential presence of unexploded ordnance (UXO) has been identified as a relevant consideration in Section 8.2.3.1 Construction Impacts of the scoping report. The potential presence of UXO and disposal sites is also a relevant consideration to the installation of cables and other intrusive works that may be undertaken in the maritime environment.

The MOD has highly surveyed routes which maybe relevant to the installation of the export cables & associated infrastructure. MOD should be consulted at the next stage of any application to determine any impact on these routes.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

Safeguarding Manager

National Air Traffic Services - Safeguarding

From:	NATS Safeguarding
To:	MS Marine Renewables
Subject:	RE: SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023 [SG35049]
Date:	24 March 2023 11:57:38
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png

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Our Ref: SG35049

Dear Sir/ Madam

NATS anticipates no impact from the proposal and has no comments to make on the Screening/ Scoping Opinion.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Public

Natural England

From:	
To:	MS Marine Renewables
Cc:	
Subject:	SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 21 April 2023
Date:	20 April 2023 16:16:42
Attachments:	428074_NE Response_INTOG CENOS_EIA Scoping Opinion.pdf

Good afternoon,

Please find Natural England's response attached for the SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation.

I've copied in JNCC as Fulmar was identified by the applicant for further consideration.

If you have any further questions, feel free to get in touch.

Kind regards,

Marine Adviser
Northumbria Marine Team – Offshore Wind
Natural England, Lancaster House, Hampshire Court,
Newcastle upon Tyne, NE4 7YH
Landline:
Mobile:
www.gov.uk/natural-england

Pronouns: She/her

This message has been sent using TLS 1.2

Date: 20 April 2023
Our ref: 428074
Your ref: SCOP-0022

Marine Scotland - Marine Planning & Policy
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Natural England
Lancaster House
Hampshire Court
Newcastle upon
Tyne
NE4 7YH

T 0300 060 3900

BY EMAIL ONLY

Dear

Request for scoping opinion for proposed Section 36 and Marine Licence Application for the Cenos Offshore Wind Farm, located 185km off the East Coast of Scotland in the Central North Sea.

Thank you for your consultation dated 16 March 2023. We also thank you sincerely for the extension you granted us for this response. The following constitutes Natural England's formal statutory response.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). We have delegated responsibility from JNCC to also advise on offshore wind farms in all English waters out to 200 nautical miles or the median line. Due to our remit, we restrict our comments to impacts to species from English Marine Protected Areas and to species in English waters.

The following document has been reviewed for this response:

- flo-cen-rep-0010_cenos_scoping_report_document_-_redacted.

Due to our remit, we have limited our advice to sections 10.2 Benthic Ecology, 10.3 Fish and Shellfish Ecology, 10.4 Marine Mammal Ecology and 10.5 Offshore Ornithology of the Scoping Report. Within these bounds we have restricted our advice to species from English Marine Protected Areas and designated species in English waters. We defer to NatureScot and JNCC for advice on Scottish matters.

Natural England consider that the majority of matters in which we have an interest for English waters have been adequately considered in the EIA Scoping Report with the exception of advising more designated sites are considered further.

Natural England's detailed advice can be found in Annex 1 of this response.

For any queries relating to the content of this letter please contact me using the details provided below. For any new consultations, or further consultations on this development, please send your correspondence to consultations@naturalengland.org.uk.

Yours sincerely

Marine Adviser
E-mail: @naturalengland.org.uk
Telephone:

Annex 1 – Detailed Advice

Topic	**Comment**
Scoping report Section 10 - Protected Areas: Table 10-1	For completeness, there are additional protected sites in the North of English waters that we advise the applicant considers going forward. These are: • Berwickshire and North Northumberland Coast SAC – designated for grey seal (*Halichoerus grypus*) and benthic features. • Flamborough and Filey Coast SPA – designated for gannet *(Morus bassanus*), breeding; guillemot (*Uria aalge*), breeding; kittiwake (*Rissa tridactyla*), breeding; razorbill (*Alca torda*), breeding; seabird assemblage, breeding • Farne Islands SPA – designated for Arctic tern (*Sterna paradisaea*), breeding; common tern (*Sterna hirundo*), breeding; guillemot (*Uria aalge*), breeding; roseate tern (*Sterna dougallii*), breeding; sandwich tern (*Thalasseus sandvicensis*), breeding; seabird assemblage, breeding
General Advice	We would like to direct the applicant to our advice on the environmental considerations and use of data and evidence to support offshore wind and cable projects in English waters. We recognise this will not all be applicable for all aspects of the project but will provide a guide for assessments concerning England. *Environmental considerations and use of data and evidence to support offshore wind and cable projects in English waters:* *https://defra.sharepoint.com/sites/WorkDelivery2512/SitePages/Home.aspx*

NatureScot

From:
Sent: Friday, May 26, 2023 4:39 PM
To: MS Marine Renewables <MS.MarineRenewables@gov.scot>
Cc:
Subject: RE: SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023

Dear

Thank you for consulting NatureScot on the scoping report for the CENOS Offshore Windfarm. As you will be aware due to its location in the East of Gannet and Montrose Fields nature conservation Marine Protected Area (ncMPA), we have also been liaising with JNCC to incorporate their advice around potential impacts to this ncMPA. This response therefore should be treated as advice from both NatureScot and JNCC.

We have recently attended a workshop (23rd May 2023) with the CENOS project which NatureScot, JNCC and MD LOT representatives attended. This was held at our request due to our concerns about the paucity of information within the scoping report on a number of issues, including, but not limited to:

- Statements of intentions to scope out topics with little or no justification at this stage
- No provision of impact assessment methods or techniques
- Lack of detail on the project, particularly the likely infrastructure requirements within the ncMPA.

We provided advice on those aspects which we felt were lacking in an email to the developer and copied to MD LOT dated 4th May 2023. The workshop did not provide sufficient clarity around those points. We also suggested at the workshop, it would be in the interests of all parties for this project to re-scope and to provide the information we had suggested would be helpful. It is unclear if the developer will do so.

As you are aware, with both ScotWind and INTOG leasing rounds, the resources across all the public bodies are stretched. We are supportive of the scoping process where it is meaningful - helping to provide direction and support to inform robust applications. We see scoping as a process which reduces the draw on staff time and also reduces risks to the developers in avoiding any delays due to the need for additional information at the application stage.

At this point we are unable to provide detailed project specific scoping advice to inform a scoping opinion as there remains too much uncertainty on assessment methods to be used and the project envelope itself. To provide advice we would need to spend considerable time and effort and we are not prepared to do so based on the scoping report received. If the developer is not minded to re-scope, we are unwilling to provide detailed pre application advice, as we consider the scoping process to be the most appropriate opportunity to provide our advice. We also note that with CENOS not likely to re-scope and therefore our unwillingness to prioritise

pre-application dialogue, this puts at risk the quality of an application, which we believe is a risk that the developer should be aware of.

In addition to the specifics of the scoping process, the discussions at the workshop have highlighted that there are still uncertainties around the regulatory and consenting responsibilities between oil and gas and offshore wind and we would find it helpful to get an update and / or discussion on these issues.

Regards

Marine Sustainability Manager | Sustainable Coasts and Seas|
NatureScot | Battleby, Redgorton, Perth PH1 3EW | 01738 458674

nature.scot | @nature_scot | Scotland's Nature Agency | Buidheann Nàdair na h-Alba

North Sea Transition Authority

From:	Stuart Walters (North Sea Transition Authority)
To:	MS Marine Renewables
Subject:	SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023
Date:	13 April 2023 17:52:03
Attachments:	image001.png

Good Afternoon,

Please find the NSTA response to the Scoping Report consultation for the Cenos Offshore Windfarm.

- The Culzean gas export flowline owned by TotalEnergies passes through the windfarm area so the applicant will need to ensure the owner is consulted throughout the process as exact turbine locations and installation construction programmes are defined with safety zones maintained.

- Cable export routes have the potential to also interact with multiple pipelines and so pipeline owners should be consulted in advance (as outlined in the document) and any potential impacts on active pipelines from EMF should be mitigated where required (e.g where cable and pipeline are both at surface and in very close proximity)

- The windfarm area interacts with a number of blocks included in the 33rd offshore oil and gas licence round (namely 22/27, 22/28b, 22/23c and 22/22c). Applications are currently being reviewed by the NSTA and any potential interactions (including any associated workplans such as seismic surveys) with planned windfarm developments are being discussed and addressed with Crown Estate Scotland. Awards from the round are expected from Q3 2023.

- Though there are no existing carbon storage licences or areas offered as part of the carbon storage licence round within or adjacent to the windfarm areas the array location is in a region of the UKCS with high future carbon storage potential and so the applicant should be aware of the potential for future carbon storage activity near to the windfarm location (though likely not until the 2030s or later).

Best Regards,

North Sea Transition Authority

Senior Policy Manager – Energy Transition
Strategy Directorate
NSTA, Lower Ground Floor, Sanctuary Buildings, 20 Great Smith Street, London, SW1P 3BT

www.nstauthority.co.uk Follow us on Twitter @NSTAuthority

NorthConnect

From:	
To:	MS Marine Renewables;
Cc:	
Subject:	RE: SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023
Date:	17 March 2023 15:38:54
Attachments:	image001.png

Thank you for providing the opportunity to respond to this consultation. NorthConnect are working with Flotation Energy on this project and are aware of their planned EIA scope, and are supportive of their approach. We have no specific feedback at this point.

Kind regards,

UK Permitting Lead

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Visit Address: Tollbugata 35 0157 Oslo
mailto:
www.northconnect.no

Northern Lighthouse Board

Northern Lighthouse Board

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Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: SCOP-0022
Our Ref: AL/OPS/ML/O6_40_797

Marine Licensing Casework Officer
Marine Scotland – Marine Planning and Policy
Marine Laboratory
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22 March 2023

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007 THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (collectively referred to as the "EIA Regulations").

Request For Scoping opinion For Proposed Section 36 Application and Marine Licences For the Cenos Offshore Wind Farm Located 185 Kilometres Off The East Coast of Scotland In The Central North Sea

Thank you for your e-mail correspondence dated 16th March 2023 relating to the Scoping Report submitted by **Flotation Energy Ltd** in relation to the proposed Cenos Offshore Wind Farm development located approximately 185 kilometres (km) off the east coast of Scotland, in the Central North Sea..

Northern Lighthouse Board note the inclusion of Section 12 – Shipping and Navigation within the report, with particular reference to Section 12.4, detailing the Mitigation Measures proposed to ensure safety of navigation throughout the lifetime of the project. This includes the Marking and lighting of infrastructure in agreement with NLB. NLB will also work with **Flotation Energy Ltd** to develop the Lighting and Marking Plan (LMP) and Navigational Safety Plan (NSP).

NLB do request the inclusion of the study of the cumulative effects of this development, in conjunction with both existing and other proposed developments within the vicinity, within the EIA document.

Northern Lighthouse Board do note the intention to host a Hazard Identification workshop to discuss the potential hazards relating to shipping and navigation for the project.

Yours sincerely

Navigation Manager

Norwegian Environment Agency

From:

Subject: Re: SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023
Date: 13 April 2023 12:01:29
Attachments: image001.png

Dear ,

The Norwegian Environment Agency, as point of contact for the Espoo convention, acknowledge receipt of your notification regarding the scoping report for Flotation Energy Ltd – Cenos Offshore Windfarm, and thank you for the opportunity to be consulted with.

Norway would like to be consulted with and kept informed on the process forward for the EIA, with The Norwegian Environment Agency as point of contact. Additionally, The Norwegian Environment Agency would like to submit the following remarks to the scope concerning potential impact on bats:

Norway, like the United Kingdom, is a member of the Eurobats Agreement under the Bonn Convention on Migratory Species. Many bat species are migratory, and the convention is an agreement on the conservation of bat species in Europe. Eurobats has an agreement on wind turbines and bat populations: Resolution 9.4 (eurobats.org)

Nathusius pipistrelle is one of the migratory species in Europe. In Norway, we know that *Nathusius pipistrelles* congregate in South-West Norway in the spring and autumn. *Nathusius pipistrelles* have been found on both platforms and vessels in the North Sea. We therefore have good indications that the species migrates between Norway and the UK.

We are concerned about the bat populations and the cumulative effects of wind power, both on land and at sea. We expect that appropriate impact assessments are undertaken pre- and post-construction, including mortality rate assessments, and that mitigation measures are being implemented to reduce mortality.

Best regards,

Senior adviser, section for land use planning
Point of contact for the Espoo Convention and the SEA Protocol

Mobile:

Norwegian Environment Agency

www.environmentagency.no| www.environment.no
Front desk: 73 58 05 00

Royal Society for the Protection of Birds Scotland

Marine Scotland Licensing Operations Team
Marine Scotland
By email: MS.MarineRenewables@gov.scot

24th April 2023

Dear

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 AND MARINE LICENCE APPLICATION FOR THE CENOS OFFSHORE WIND FARM LOCATED APPROXIMATELY 85 KILOMETRES OFF THE EAST COAST OF SCOTLAND IN THE CENTRAL NORTH SEA 35 EAST OFF THE COAST OF PETERHEAD

Thank you for consulting RSPB Scotland on the above proposed 'INTOG' targeted oil and gas decarbonisation project. We understand it would comprise up to 70 to 100 offshore floating turbines each with a capacity between 15 MW to 20MW, a maximum rotor diameter of 220 to 330 meters, a maximum blade tip height above lowest astronomic tide (LAT) of 242 to 352 meters and minimum blade clearance (airgap) above LAT of 22 meters. There would also be a network of inter-array, an offshore electrical hub, and associated infrastructure to operate and maintain the windfarm. The oil and gas platforms to be connective have not all been identified.

General Comments

The UK is of outstanding international importance for its breeding seabirds and wintering marine birds. As with all Annex I and regularly migratory species, the UK has a particular responsibility under the Birds Directive to secure their conservation. Their survival and productivity rates can be impacted by offshore windfarms directly (i.e. collision) and indirectly (e.g. displacement from foraging areas, additional energy expenditure, potential impacts on forage fish and wider ecosystem impacts such as changes in stratification).

RSPB Scotland encourage the adoption of a precautionary approach to the identification of relevant protected sites for seabirds with clear methodology on the exclusion of sites and species. We generally agree with the collection and analysis methods advised by NatureScot, with some exceptions as set out below. We recommend use of the guidance notes available on their website to inform assessment. If an Applicant chooses to undertake supplementary modelling using alternative parameters to that recommended, we suggest this is clearly labelled.

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As set out in Searle et al (2023)[1], assessing impacts of offshore windfarms and other renewables developments is inherently uncertain. This uncertainty is propagated throughout the impact assessments, as there are not only direct impacts, but ecosystem wide impacts that can change, for example, the abundance and availability of prey. Multiple data sources and modelling techniques are used to capture a simplified version of reality. They do not fully capture the complexity of seabird behavioural or demographic processes in a dynamic marine environment.

Not recognising these uncertainties risks poorly informed decisions being made. Furthermore an underestimation of impacts will have repercussions when consenting later offshore wind development. If a precautionary approach is taken from the beginning, the likelihood of irreversible damage occurring is reduced even whilst our knowledge base is incomplete, and modelling improves.

The precautionary principle requires the Applicant to demonstrate with scientific certainty that something would not be harmful. The concept of something being overly precautionary dismisses the inherent uncertainty in modelling and overlooks the simplistic version of reality that the modelling captures.

We have been unable to find the proposed length of consent within the Scoping Report section 2.7.2 of the CES lease would likely be for fifty years with the design life of the turbines and other components being of a similar period of time. Further clarity on this will be required in order to assess the proposed development.

Bio-seasons for Kittiwake and Gannet

The RSPB has outstanding issues with the manner in which the bio-seasons definitions from Furness (2015)[2] have been defined for gannet and kittiwake. This is because by using the "migration-free" seasonal definition as opposed to full breeding season the early and later months of the season are effectively excluded. For example, the kittiwake breeding season is defined as May to July, when evidence from colony monitoring shows that birds are present from April at least to August. In the latter part of the season all birds will have fledged but individual birds will still be present with both young and adult birds coming back to the cliff. These are still SPA birds, and those most likely to be affected by impacts from the development

Foraging Ranges for Common Guillemot and Razorbill

We welcome using foraging ranges as published in Woodward *et al*. (2019)[3] to derive connectivity with SPA colonies. We also recommend that site specific data are examined and where the maximum foraging range from the colony exceeds the generic value, that the site-specific value is used.

---

[1] Searle, K. R., O'Brien, S. H., Jones, E. L., Cook, A. S. C. P., Trinder, M. N., McGregor, R. M., Donovan, C., McCluskie, A., Daunt, F., and Butler, A., 2023. *A framework for improving treatment of uncertainty in offshore wind assessments for protected marine birds*, ICES Journal of Marine Science, 2023;, fsad025, https://doi.org/10.1093/icesjms/fsad025

[2] Furness, R.W. (2015) Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS). Natural England Commissioned Reports, Number 16

[3] Woodward, I., Thaxter, C.B., Owen, E. and Cook, A.S.C.P. (2019). Desk-based revision of seabird foraging ranges used for HRA screening. BTO Research Report No. 724, British Trust for Ornithology, Thetford. ISBN 978-1-912642-12-0.

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The exceptions to this are for common guillemot and razorbill. Tracking on Fair Isle showed foraging for both common guillemot and razorbill distances are greater than those of all other colonies. This may relate to poor prey availability during the study. However, trends for seabirds in the Northern Isles indicate this may be becoming a more frequent occurrence. For all designated sites south of the Pentland Firth (i.e. excluding the Northern Isles), we advise use of mean max (MM) plus one standard deviation (SD) discounting Fair Isle values. For clarity, North Caithness Cliffs SPA is considered to lie south of the Pentland Firth.

	All Northern Isle SPAs	**All sites south of Pentland Firth**
Common guillemot	153.7 MM+SD	95.2 MM+SD
Razorbill	164.6 MM+SD	122.2 MM+SD

In the non-breeding season, seabirds are not constrained by colony location and can, depending on individual species, range widely within UK seas and beyond.

Gannet

Whilst the RSPB agree with the majority of the NatureScot advised Avoidance Rates including the use of a 98.9% avoidance rate for non-breeding gannets, in our opinion, a 98% avoidance rate is more appropriate for breeding gannets. This is because the figures used for the calculation of avoidance rates advocated by the SNCBs are largely derived from the non-breeding season for gannet. During the breeding season, gannets are constrained to act as central placed foragers meaning they return to the colony after feeding in order to maintain territories, incubate eggs and provide for chicks. Once chicks have fledged adult gannets remain at sea and no longer visit the colony. Differences in behaviour between the breeding and non-breeding season are likely to result in changes in avoidance behaviour.

This seasonally defined change in reactive behaviour will also be reflected in the distributional changes occurring due to the presence of turbines. As such, alongside the 70% displacement rate recommended by NatureScot for the assessment of gannet, we recommend the presentation of 60% displacement rate during the breeding season.

EIA Assessment of Significance

An EIA report must include a description of the likely significant effects of the development on the environment. RSPB are frequently presented with a matrix approach to significance which combines the value of a rector with the magnitude of impacts. This formulaic approach is one way to present significance, but the categorisation is not biologically meaningful and may not be the best way to assesses the significance of impacts. Furthermore, the uncertainty in the score, as described by Wade *et al.,* (2016) is typically not incorporated into this approach. This should be case, and we would recommend doing so following the principal that the greater the uncertainty the greater the need for precaution (Searle *et al.,* 2023)

When assessing significance, it is particularly relevant that:

- Seabirds are relatively long-lived, take longer to reach breeding age than most other birds and have just one or two young per year. As a result, their populations are sensitive to small increases in adult mortality.
- NatureScot's latest assessment of 11 Scottish breeding seabird species show that numbers fell by nearly half (49%) between 1986 and 2019[4].
- Governments of the UK have collectively failed to meet 11 out of the 15 indicators of Good Environmental Status (GES) for our seas as required under the Marine Strategy Regulations 2010. The marine birds indicator is moving away from target. For breeding seabirds, more species are now experiencing frequent, widespread breeding failures[5] .
- Black-legged Kittiwake and Atlantic Puffin are red listed on the Birds of Conservation Concern and have been assessed by the IUCN as vulnerable to global extinction.
- The growth of offshore wind is placing great cumulative pressure on seabird colonies.

RSPB Scotland disagree with the magnitude of impact being assessed in terms of predicted increases to baseline mortality. As above, small increases in mortality can have large impacts. It is more meaningful to view impacts across the lifeline of the development in comparison to population size in the absence of the development and consider long-term viability of colonies and time for recovery.

EIA Non-technical Summary

RSPB Scotland advocate for the planning and consenting process to be accessible. In relation to ornithology, the EIA will contain complex statistical models, the output of which is not readily understood by a lay person. A non-technical summary (NTS) is therefore vital to set out the main findings of the EIA report in an accessible way and in plain English so that it is easily understood by the public. It should not just describe the process but also clearly present information (to the specifications of the scoping opinion) with interpretation and explanation with clear figures, maps, and tables as necessary. It should not hide any key messages of the EIA by over-summarising or averaging out findings.

The ornithological section of the NTS should clearly explain what is meant by 'significant' in an ornithological context. It should provide direction to the reader of where in the EIA Report to find information on how the sensitivity of the receptor was assessed and how the magnitude of potential impacts was calculated. If magnitude of impact has been related to a specific element or elements (for example time to recovery following cessation of project or alteration of the long-term viability of the population) this should made clear.

We recommend the NTS contains clear information on how the mitigation hierarchy has been followed. The mitigation hierarchy requires that:

[4] Scottish Biodiversity Indicator – The Numbers and Breeding Success of Seabirds (1986 to 2019) | NatureScot
[5] CEFAS Marine Assessment Tool – Marine Breeding Bird Success https://moat.cefas.co.uk/biodiversity-food-webs-and-marine-protected-areas/birds/breeding-successfailure/

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- Adverse impacts should firstly be avoided as far as possible;
- Any remaining adverse impacts should then be minimised or reduced to as low as practical; and
- For residual adverse impacts which are both unavailable and cannot be reduced further, measures to remedy or offset the impacts should be included within the application.

To make the NTS informative, we welcome the use of short summary tables. We suggest a series of tables are used to present the following information:

- Annual mortality for relevant species using the methods set out in the scoping opinion for the development in isolation
- Annual mortality for relevant species using the methods set out in the scoping opinion for the development in cumulation with impacts arising from any existing or approved development
- Predicted population size of relevant SPA colonies after the lifetime of the proposed development using the methods set out in the scoping opinion presented and as a percentage (min-max) of what it would have been in the absence of the proposed development
- Predicted population size of relevant SPA colonies after the lifetime of the proposed development and other relevant developments (i.e in cumulation) using the methods set out in the scoping opinion and presented as a percentage (min-max) of what it would have been in the absence of the proposed development

Finally, we wish to highlight that within the British Energy Security Strategy[6], the UK Government has set a target to deliver 50GW of offshore wind including up to 5GW of floating offshore wind by 2030. They have not set a target for 50 GW offshore floating wind as suggested in section 2.6 of the Scoping Report.

Should you require any further information or clarification, please do not hesitate to get in contact.

Yours sincerely,

Senior Marine Conservation Planner
RSPB Scotland

[6] https://www.gov.uk/government/publications/british-energy-security-strategy

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27 March 2023

Marine Licensing and Consenting Casework Officer
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MS.MarineRenewables@gov.scot

Dear ,

Cenos Offshore Windfarm - Scoping Consultation

I have read the relevant parts of the scoping report on behalf of RYA Scotland and note that shipping and navigation are to be scoped in. Although rather few recreational boats pass through the site, we would like to contribute to the Navigational Risk Assessment at the hazard workshop. Recreational boats can be difficult to spot using radar but we feel that no observations beyond those required by MGN654 are needed.

Yours sincerely,

Planning and Environment Officer, RYA Scotland

sport scotland
LOTTERY FUNDED

Scottish Environment Protection Agency

From:	Planning.North
To:	MS Marine Renewables
Subject:	FW: SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023
Date:	22 March 2023 14:18:38

OFFICIAL

Thank you for your consultation below. We understand that that this consultation request relates to the proposed section 36 consent and marine licence application for the array area only and not the export cable corridor or onshore elements of the works. In that case please refer to SEPA Standing Advice for Marine Scotland on marine consultations and the extracts as below.

Marine Scotland

2.2 Please do not routinely consult SEPA directly on any applications which are purely within the marine environment, including at any stage of EIA or repeat consultations. Please consider our standing advice in Section 3 and Table 1 as SEPA's views and consultation response, where relevant.

2.3 Notwithstanding the advice above, should there be a development proposal of potentially significant impact on aspects of the environment directly regulated by SEPA which is not dealt with adequately by our standing advice or is novel or unusual, then please do consult us specifying exactly the aspect of the environment regulated by SEPA on which advice is sought.

Section 3 Advice for Marine Scotland

Standing advice

For all matters covered by the below advice, SEPA has not assessed the application, has no site-specific comments to make and, where relevant, does not consider EIA is required from our perspective.

Bathing Waters

Any operation should be cross checked to see if the proposed site is in or adjacent to a designated bathing water (within 2 km). If so, all physical operations should be done outwith the Bathing Water Season (1 June to 15 September).

If works to be done within Bathing Water Season, a strong case should be made as to why a particular operation would not present a risk to Bathing Waters.

Please refer to the Bathing waters section of our website www2.sepa.org.uk/bathingwaters/ for further guidance on the Bathing Waters Directive (2006/7/EC).

Pollution prevention

Many operations could potentially give rise to risk of pollution through silt mobilisation, silt suspension or chemical or oil spillages. To prevent pollution and safeguard marine ecology interests it is vital that good working practice is adopted, and appropriate steps taken to prevent water pollution and minimise disturbance to sensitive receptors. Measures need to be in place to minimise the release of sediment plumes and to contain and prevent construction and waste materials e.g., paint from falling from a structure into the water body beneath. Where appropriate, mitigation measures should be sought within method statements and onsite compliance should be confirmed through site visits.

Please refer to gpp-5-works-and-maintenance-in-or-near-water.pdf (netregs.org.uk). This includes working with concrete, cement and grout.

SEPA has no objection to the release of sediment tracing material into the water environment for the undertaking of a dispersion study (e.g. for aquaculture or septic tank flows). However, we strongly recommend the use of biodegradable material. We do not consider the use of non-biodegradable products (e.g. microplastic beads) to be the best environmental option.

On-shore works and restoration

With regard to works on the shoreline, the applicant should refer to the appropriate sections in the Guidance for Pollution Prevention (GPPs) and CIRIA Guidance, in particular C744 Coastal and marine environmental site guide. 2nd edition, 2015 CIRIA. Disturbance to the shoreline should be minimised and the shore restored to as near its former condition following the works as reasonably possible on completion of the works. SEPA recommends that new infrastructure, including sea outfalls (including septic tank outfalls), be buried where possible and redundant structures and materials be removed.

Please refer to CAR_a_practical_guide.pdf (sepa.org.uk) for a guide to The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) including an overview; definitions of the regimes; levels of authorisation and the General Binding Rules.

The developer should consider if waste deposition could constitute landfill and should therefore be subject to authorisation under PPC and should comply with all relevant environmental legislation and to check our website at www.sepa.org.uk/regulations/ and contact SEPA via the online form with any site-specific issues. Where appropriate, any waste materials should be removed and disposed of at a licensed onshore site.

Dredge spoil

Dredged material should be disposed of at an offshore sea disposal site and that work must be carried out in line with best dredging practices. Material should be deposited on the beach below MHWS and allowed to disperse naturally. If any dredged material accumulates above MHWS, disposal operations must cease until the material has dispersed.

Waste material (includes dredge spoil) above the low water mark

Waste material, which includes dredge spoil, deposited above the low water mark is subject to Waste Management Licensing controls regulated by SEPA unless it is subject to a licence issued under Part 4 of the Marine (Scotland) Act 2010 (which can extend to Mean High Water Spring Tide including within estuaries, rivers and channels), in which case it is excluded from such controls. However, if the waste deposition could constitute a landfill, then PPC not Waste Management Licensing would apply, and in this situation no Marine Licence exclusion is provided for.

Where dredge spoil is used for land reclamation works or harbour works then the method of construction will determine how the activity is regulated. If the works are carried out by way of deposit of material directly onto the intertidal zone or within a permeable bunded area (for example a bund made of placed stones) then the works will be considered to be occurring in the marine environment and will be regulated by Marine Scotland. If the works are constructed by way of initially creating an impermeable bund (such as a sheet piled metal wall) then the use of

waste such as dredge spoil for infill works will be considered to be occurring above mean high water springs and therefore will be controlled by SEPA. Such works would require either a waste management licence or a waste management exemption.

The applicant should consult the local SEPA Regulatory Services team (see contact sheet for details) for advice on whether or not the proposed waste deposition would constitute a landfill and hence fall within PPC regulation, including for the controlled placement of dredged sands from harbours onto adjacent beaches and/or seabed.

Decommissioning

While MS-LOT consult on Marine Licence applications for decommissioning, the applicant will consult themselves on the Decommissioning Programme (as per Energy Act 2004) required to be submitted as part of the s.36/Marine Licences issued for renewables construction. SEPA does not require to be consulted and will provide no comments on the Decommissioning Programme.

Please ensure that conditions cover decommissioning where appropriate and the removal of all devices and as much of the support infrastructure/cabling is removed and all waste materials are removed and reused, recycled or disposed of at a licensed onshore site.

Regards

Senior Planning Officer
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Part Time: Tuesday, Wednesday & Thursday

Scottish Fishermen's Federation

SCOTTISH FISHERMEN'S FEDERATION

Our Ref: MM/13/04

Your Ref:

13 April 2023

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Cenos Scoping Response

This response to the scoping request is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association, Shetland Fishermen's Association and the Chair of the NECrIFG.

In the first instance, the SFF notes that the project claims that the NorthConnect elements of the project have been previously subject to EIA and consented and hence will only be considered within the Cenos EIA as part of the cumulative assessment. For the SFF, as NorthConnect is not a reality this comment is null and void and the entire route for Cenos export cables should be a part of the scoping process. The fact that the routes are similar does not mean there will be no additional impacts if both were side by side.

Then, the SFF is very concerned that this development is in such a rush to build and power that the Rochdale Envelope approach is going to be stretched to the limit. Turbines are not defined, mooring systems are not defined, cabling is not defined, customers are not defined, with this lack of clarity a terrestrial planning authority would be hard pushed to accept such an application. This rush is highlighted in the expectation that all the required scoping, EIA and Licence application are filed by end of 2023, expecting consent in 2024 to qualify for CFD in 2025, followed by incremental powering up to allow for income at the earliest stage possible.

The preconstruction surveys and preparation and stakeholder consultation are still to be developed, which makes production of a full and proper EIA and Licence Application before the end of 2023 even more unlikely. There may be a drive to cut the consenting time, but cutting corners is not the way to do it, the fastest the process should be is the speed which gives the proper outputs at completion.

In the first 30 pages of the request, Cenos reiterates 3 times that the prime objective is to decarbonise various O&G assets, but the details of this are sketchy, to say the least. Page 10 claims outputs will be more than O&G require, but then page 12 claims O&G needs of 2.366GW being 100% replaced by renewables, from a project that lists production at 1.4GW. At other points in the narrative it is stated that O&G will use 80% of the power outputs with 20% going to shore. The eventual scoping report should be much clearer and not include such contradictory claims.

The fact that the project has not reached the stage of using one mooring option is yet another factor which the SFF would see as being a step too far for the Rochdale Envelope process, particularly since the footprint of any one design could vary up to 2km dia, which then impacts on the design of the layout and then ultimately decides whether fishing may continue post-construction. The SFF would contend that these parameters must be defined long before consent or the EIA cannot deliver realistic assessments on the fishing industry.

Furthermore, given that O&G export cables may possibly reach a total of 1000km, the SFF cannot accept that these may be assessed in "general" terms. The impact of these can only properly be measured by using routes, which may have to be proxies in the first instance or is it acceptable to say, "no route" but 1000km of cables will have no impact on the area, which includes an MPA?

Looking closer at the East of Gannet and Montrose Fields NCMPA, it is the only MPA designated in the northern North Sea region for the protection of offshore deep sea muds. The deep sea muds occur across the south-east half of the MPA, approximately 100 m deep. Not only that but the enormously rare Ocean quahog are distributed across the entire site, with the supporting habitat for this feature occurring across the north-west, which should mean the only activity allowed in the area would by default the North East section? The SFF would insist on this being scoped in, in order to verify that the development is not interfering negatively with the MPA.

Whilst the SFF cannot deny the ICES square is maybe not as productive as its neighbours, that does not mean that the assessment of productivity of the fleet should not be properly considered, and thence the displacement which may occur. Displacement remains an option that must be scoped in.

It is clear that throughout the staged construction and maintenance operations there will often be moorings, cables etc waiting for hook up, and it is not good enough for the developer to claim that there is too much uncertainty surrounding this and cables routes in order to avoid assessing the impacts. There must exist enough knowledge within the renewables industry to scope these in with more confidence than that. Furthermore there must be scoped in the impact of leaving these infrastructure elements buoyed in the sea, and any need for Guard Vessels should be assessed.

The request talks about many of the ongoing discussions surrounding the growth of renewables, but consultations and draft plans are not relevant until finalised. The SFF would expect the Licence application to show how the developer has considered the Fishing Policies from the Scottish National Marine Plan. The SFF would expect the project to scope in the latest science on EMF and Heat, Thrumming and Noise, rather than claiming on P74 that the effects are not evidenced so scoped out. The onus is on the developer to provide evidence to back up these claims.

Touching on decommissioning, the description given is not suitable, therefore the SFF would expect to see a much improved proposition, including the need for any cutting to be below seabed

level. The SFF would expect to see decommissioned cable scoped in to determine whether it is safe to leave it behind, which could end up with patchwork pieces of cable all over the North sea.

When the request talks of socio-economic indices it seems to avoid assessing the value chain for fisheries after landing, which is wrong in that it is generally accepted that for every job at sea there are 5 ashore. Nevertheless a simple £ value attributed to each industry is obviously going to be biased in favour of the renewables industry. Therefore there must be some other parameter than £ which gives a fairer value, as the claims of jobs appearing seem to be grossly overstated. The chart on Page 107 is to say the least disingenuous, it should only show the ports and harbours which will genuinely benefit from the renewables revolution. Furthermore the scoping report should include a section to back up the project claims about the local supply chain, as there is a general belief that little will be built in this country, but simply assembled and floated out.

In that respect, since there are many claims throughout the paper about the emissions being resolved by the project, the SFF would expect to see scoped in a genuine auditable range of positive and negative values of emissions engendered by the project from day one to decommissioning, recognising that at that point most of the structures become waste. In light of the stated reason for the enhanced growth of offshore renewables, the climate crisis, there should be an onus on developers to prove beyond reasonable doubt that their projects are focussed on emission reduction, and not simply for profit.

Fisheries Policy Officer
Scottish Fishermen's Federation

Scottish Water

Friday, 17 March 2023

Marine Licensing
375 Victoria Road

Aberdeen

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk

Follow Us

Dear Customer,

Cenos Offshore Windfarm, 185km off the East Coast of Scotland in the, Central North Sea, TD10 6UR
Planning Ref: SCOP-0022
Our Ref: DSCAS-0083188-BC8
Proposal: Cenos Offshore Windfarm 185km off the East Coast of Scotland in the Central North Sea

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Development Operations Analyst
Tel:
developmentoperations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Transport Scotland

Development Management and Strategic Road Safety
Roads Directorate

George House 36 North Hanover St Glasgow G1 2AD
Direct Line: , Fax:

TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

Marine Scotland
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

ms.marinerenewables@gov.scot

Your ref:

Our ref:
GB01T19K05

Date:
14/04/2023

Dear Sirs,

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

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

FLOTATION ENERGY LTD – CENOS OFFSHORE WINDFARM - SCOPING CONSULTATION

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Flotation Energy Ltd in support of the above development.

This information has been passed to SYSTRA Limited (SYSTRA) for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

Proposed Development

The proposed development comprises an offshore windfarm of up to 100 turbines with a maximum blade tip height of 352m, located approximately 185km off the Aberdeenshire coast. The turbines will be connected to an offshore electricity hub and will provide power to selected oil and gas installations. We note that a floating substructure will support each of the wind turbines and the project team is currently reviewing several designs which could be suitable for the offshore windfarm. Installation of the turbines will take up to three years.

Assessment of Environmental Impacts

The SR indicates that a large volume of raw materials will be required during the construction phase, including concrete, metals, fiberglass and plastics or resins. We also note that a number of vessels will be required for the tow, transport and installation of the wind turbines, mooring systems, cables and offshore electricity hub. The SR states that the specific port location where vessels will travel to and from has not yet been identified.

Transport Scotland would request that the potential impact of traffic relating to the transport of the raw materials on the trunk road network and the turbine components be quantified, with a threshold assessment carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Road Traffic used as a screening process for the assessment. These specify that road links should be taken forward for detailed assessment if:

- Traffic flows will increase by more than 30%, or
- The number of HGVs will increase by more than 30%, or
- Traffic flows will increase by 10% or more in sensitive areas.

Where significant changes in traffic are not noted for any link, no further assessment needs to be undertaken. We acknowledge that this may well be the case if the majority of materials etc are transported to the turbine locations by sea rather than by road before being transported out to the works area.

Abnormal Loads Assessment

Should the turbine components require to be transported to the selected port(s) by road prior to turbine erection, Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.

A full Abnormal Loads Assessment report should be provided with the Environmental Impact Assessment Report (EIAR) that identifies key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.

In the event that all turbine components are to be transported by sea, this information will not be required.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully

Transport Scotland
Roads Directorate

cc SYSTRA Ltd.

UK Chamber of Shipping

UK CHAMBER of SHIPPING

30 Park Street
London
SE1 9EQ

@ukchamberofshipping.com

13 April 2023

Dear Sir/Madam

The UK Chamber of Shipping Response to Cenos Offshore Wind Farm Scoping Report Consultation

The Chamber of Shipping notes that the Scoping Report does not pose specific questions as other proposed developments at the Scoping stage have done so. The Chamber therefore uses the template of those questions as a basis to respond to the Cenos Scoping Report.

• Do you agree that all relevant legislation, policy and guidance documents have been identified for the shipping and navigation assessment, or are there any additional legislation, policy and guidance documents that should be considered?

The list of documentation looks broadly as expected to assess the shipping and navigation impact, however should also include Scotland's National Marine Plan and its policies and Scotland's Sectoral Marine Plan for Offshore Wind Energy and its policies. The Chamber notes there are referenced in the Scoping Report but not in relation to Shipping and Navigation specifically.

• Do you agree with the study area defined for shipping and navigation?

Yes the 10nm study area is an accepted standard. The Chamber recommends a wider routeing study area of 50nm, which may be included as part of the wider cumulative impact assessment to consider routeing impacts of the proposed development in combination with other developments.

• Do you agree with the data and information sources identified to inform the baseline for shipping and navigation including the planned vessel traffic surveys, or are there any additional data and information sources that should be considered?

AIS data from 2021 will not be representative of a typical year due to Covid-19 in particular for passenger/cruise traffic. Accordingly, the Chamber recommends that additional AIS only data for 2022 is procured for seasonal variation. This is widely available and allows for greater seasonal analysis.

The Chamber recommends a longer time period of 20 years worth of MAIB data be used as a secondary data resource for accident data. This practice has become commonplace and is helpful given the extended duration of the proposed wind farms lifespan.

• Do you agree with the suggested embedded mitigation measures?

The Chamber would expect to see inclusion of all the embedded mitigation measures as a minimum.

• Do you agree that all potential receptors and impacts have been identified for shipping and navigation?

During Construction & Decommissioning:

Vessel displacement is omitted and should be included.

Vessel to vessel collision risk should be broken down into collision risk between third party vessels as well as collision risk between third party vessels and project vessels.

The Chamber would assert that allision risk will be present within the construction and decommissioning phases and should be included.

Operational:

Vessel displacement is omitted and should be included.

• Do you agree that the impacts proposed can be scoped out of the shipping and navigation EIA chapter?

The Chamber agrees that no potential impacts should be scoped out.

• Do you agree with the approach for cumulative effects assessment and transboundary impacts?

The Chamber agrees that cumulative and transboundary impacts need to be considered and would be satisfied with a 50nm study area.

• Do you agree with the proposed assessment approach and list of planned consultees?

Yes

The Chamber trusts these comments will be taken into consideration and looks forward to further engagement with the applicant during the planning and consenting process.

Yours faithfully,

Policy Manager (Safety & Nautical) & Analyst
UK Chamber of Shipping

Whale and Dolphin Conservation

From:
To: MS Marine Renewables
Subject: FW: SCOP-0022 - Flotation Energy Ltd – Cenos Offshore Windfarm - Scoping Consultation – By 13 April 2023
Date: 24 March 2023 09:25:21
Attachments: image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
image008.png
image009.png

Dear

Thank you for your email below, I have been forwarded this as has recently left WDC and I'm helping out on offshore renewable responses until that role is recruited for.

We generally don't engage on individual developments, so please take this as a 'nil return' response.

Do let me know if you have any queries.

Best wishes.

research coordinator

Telephone:

WDC, Whale and Dolphin Conservation
Brookfield House
38 St. Paul Street
Chippenham
Wiltshire
SN15 1LJ
United Kingdom
whales.org