CERULEAN WINDS

Cerulean Winds Aspen Project Limited

Aspen Offshore Wind Farm

Environmental Impact Assessment Report and Habitats Regulations Appraisal Addendum

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Defined Terms

Term	Definition
Addendum	The document which supplements the submitted Offshore Environmental Impact Assessment Report and Report to Inform Appropriate Assessment by providing additional environmental information and clarifications in response to the MD-LOT Request for Additional Information.
Applicant	Cerulean Winds Aspen Project Limited.
Appropriate Assessment (AA)	A specific part of the Habitats Regulations Appraisal process, evaluating whether a plan or project may affect the integrity of a European Site.
Aspen Array Area	The area in which the generation infrastructure for Aspen Offshore Wind Farm, including Wind Turbine Generators and Offshore Substation Platforms will be located.
Aspen Lease Area	The site for which Cerulean Winds (UKCS) Ltd was awarded an Exclusivity Agreement. The Aspen Lease Area totals 333 km^2 in which the Aspen Array Area will be sited.
Beech Lease Area	The site for which Cerulean Winds (UKCS) Ltd was awarded an Exclusivity Agreement. The Beech Lease Area totals 333 km^2 in which the Beech Array Area will be sited.
Cedar Lease Area	The site which Cerulean Winds (UKCS) Ltd was awarded an Exclusivity Agreement. The Cedar Lease Area totals 333 km^2 in which the Cedar Array Area will be sited.
Cumulative Effects	The combined effect of the Proposed Development in combination with the effects from a number of different projects, on the same single receptor/resource.
Cumulative Impacts	Impacts that result from changes caused by other past, present or reasonably foreseeable actions together with the Proposed Development.
Design Envelope	A description of the range of possible elements that make up the Proposed Development's design options under consideration, as set out in detail in the project description. This envelope is used to define the Proposed Development for Environmental Impact Assessment and Habitats Regulation Appraisal purposes when the exact engineering parameters are not yet known. This is also known as the "Rochdale Envelope" approach.
EIA Regulations	The collective term used to refer to the following: ▪ The Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2017; ▪ The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017; and ▪ The Marine Works (Environmental Impact Assessment) Regulations 2007.
Environmental Impact Assessment (EIA)	A statutory process whereby planned projects must be assessed before a formal decision to proceed can be made. It involves assessment requirements outlined in the EIA Regulations, including the collection and consideration of environmental

Term	Definition
	information, which fulfils the publication of an Environmental Impact Assessment Report.
European Site	Protected sites, originally established under EU legislation, including Special Areas of Conservation, candidate Special Areas of Conservation, Special Protection Areas, proposed Special Protection Areas and Ramsar sites.
Floating Foundations	The foundations on which the Wind Turbine Generators are installed.
Foundation Anchors	The structure which anchors the moorings to the seabed.
Foundation Moorings	The chains/synthetics that connect the Floating Foundations to the Foundation Anchors to maintain floater station.
Inter-array Cables (IACs)	Cables which link the Wind Turbine Generators to each other and to the Offshore Substation Platforms within the Aspen Array Area.
Inter-link Cables	Cables that will link Offshore Substation Platforms within the Aspen Array Area.
Landfall	The area between Mean Low Water Spring and Mean High Water Spring where the Offshore Transmission Cables will connect onshore to offshore.
Marine Directorate Licensing Operations Team (MD-LOT)	The Marine Directorate responsible for Section 36 Consents, and marine licensing within the Scottish inshore region (between 0 and 12 nautical miles (nm)) and in the Scottish offshore region (between 12 and 200 nm). MD-LOT acts on behalf of the Scottish Ministers.
Marine Licence	Licence granted under the Marine (Scotland) Act 2010 and/or the Marine and Coastal Access Act 2009 where relevant.
Offshore Environmental Impact Assessment Report (Offshore EIAR)	The published report of the EIA that will be undertaken for the Proposed Development.
Offshore Scoping Opinion	The document issued by MD-LOT on 12 May 2025 to the Applicant under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2007 and the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, setting out the Scottish Ministers' opinion on the content of the Offshore Environmental Impact Assessment Report (Offshore EIAR) including those issues that will or will not need to be addressed in the Offshore EIAR.
Offshore Scoping Report	The document submitted by the Applicant on 31 January 2025 setting out the proposed contents of the Offshore Environmental Impact Assessment Report and provided to MD-LOT to support the request for an Offshore Scoping Opinion.
Offshore Substation Platform (OSP)	Offshore platform consisting of High Voltage Alternating Current substations or High Voltage Direct Current substations.
Offshore Transmission Cable Corridor (OTC Corridor)	The area within which the Offshore Transmission Cables will be installed.
Offshore Transmission Cables (OTCs)	The subsea electricity cables running from Landfall in the region of Stonehaven to the Offshore Substation Platform(s) in Aspen Array Area. The OTCs will act as both a demand and supply cable.

Term	Definition
	The OTCs will provide both traditional supply of power to grid but also ensures robust secure power supply to oil and gas assets when the Aspen Array Area is not generating sufficient renewable power to support their demand.
Offshore Wind Farm (OWF)	The proposed generation infrastructure comprising of Wind Turbine Generators and associated, Offshore Substation Platform(s), foundations and substructures and Inter-array Cables.
Project	Aspen Offshore Wind Farm - comprises the wind farm and all associated offshore and onshore components.
Proposed Development	The offshore components of the Project (Aspen Offshore Wind Farm) which include all offshore infrastructure associated with Aspen Array Area and the Offshore Transmission Cables.
Section 36 Consent	Consent under Section 36 of the Electricity Act 1989 for the construction, or extension, and operation of electricity generating stations.
Wind Turbine Generator (WTG)	The wind turbine that generates electricity consisting of tubular towers and blades attached to a nacelle housing mechanical and electrical generating equipment.

Abbreviations

Abbreviation	Definition
CGR	Counterfactual Growth Rate
CPS	Counterfactual Population Size
Defra	Department for Environment, Food and Rural Affairs
ECMR	Environmental Compensatory Measures Reforms
ECPCC	Excluding consented projects committed to compensation
EIAR	Environmental Impact Assessment Report
GW	Gigawatt
HRA	Habitats Regulations Appraisal
IAC	Inter-array Cables
INTOG	Innovation and Targeted Oil and Gas
iPCoD	Interim Population Consequences of Disturbance Model
JNCC	Joint Nature Conservation Committee
MAU	Marine Analytical Unit
MD-LOT	Marine Directorate - Licensing and Operations Team
MHWS	Mean High Water Springs
MMMP	Marine Mammal Mitigation Plan
MoD	Ministry of Defense
MPA	Marine Protected Area
MRF	Marine Recovery Fund
NATS	National Air Traffic Services
ncMPA	Nature Conservation Marine Protected Area
NMP2	National Marine Plan 2
OSP	Offshore Substation Platforms
OTC	Offshore Transmission Cables
OWF	Offshore Wind Farm
PTS	Permanent Threshold Shift
PVA	Population Viability Analysis
RIAA	Report to Inform Appropriate Assessment
SFF	Scottish Fishermen's Federation
SMP	Seabird Monitoring Programme

Abbreviation	Definition
SMP-OWE	Sectoral Marine Plan for Offshore Wind Energy
SPA	Special Protection Areas
SSC	Suspended Sediment Concentration
WTG	Wind Turbine Generators

1 Introduction

1.1 Overview

1.1.1 This Addendum to the Aspen Offshore Wind Farm (OWF) consent applications has been prepared to supplement and, where necessary, update information presented within the Offshore Environmental Impact Assessment Report (EIAR) and Habitats Regulations Appraisal (HRA) documentation. These documents were submitted by Cerulean Winds Aspen Project Limited (hereafter referred to as the Applicant) to the Marine Directorate - Licensing and Operations Team (MD-LOT) in August 2025 (see Table 1.1 for consent application document structure).

1.1.2 The Applicant is proposing to develop the Aspen Offshore Wind Farm (hereafter referred to as the Project). The Project comprises both offshore and onshore components. The Offshore EIAR and HRA documentation relate solely to the offshore elements of the Project, seaward of Mean High Water Springs (MHWS), which are hereafter referred to as the Proposed Development.

1.1.3 The Offshore EIAR and HRA documentation supports the Applicant's application for necessary consents and permissions to facilitate the construction, operation and maintenance (O&M), and eventual decommissioning of the Proposed Development. The approvals, licences and permissions required for the Proposed Development include:

- A Section 36 consent under the Electricity Act 1989;
- A Marine Licence under the Marine and Coastal Access Act (MCAA) 2009 for the generating assets of the Proposed Development located beyond the 12 nautical mile (nm) limit within the Exclusive Economic Zone (EEZ); and
- A Marine Licence under the Marine (Scotland) Act 2010 for the offshore transmission infrastructure within 12 nm of the coast, as well as under the MCAA for any offshore transmission infrastructure beyond the 12 nm limit within the EEZ.

1.2 Description of the Proposed Development

1.2.1 The Aspen Array Area covers approximately 333 km² and is located around 84 km east of Peterhead, off the east coast of Scotland. The offshore infrastructure associated with the Proposed Development includes Wind Turbine Generators (WTGs) and associated floating foundations, Offshore Substation Platforms (OSPs) and associated foundations, Inter-array Cables (IACs), Inter-link Cables, Offshore Transmission Cables (OTCs), and the offshore elements of the landfall.

Table 1.1 Offshore EIAR and HRA Documentation Structure

Document	Volume	Chapter	Title
Application Documents	Section 36 letter and Marine Licence application forms		
Offshore EIAR	-	-	Non Technical Summary
	1	1	Introduction
		2	Policy and Legislative Context
		3	Project Description
		4	Environmental Impact Assessment Methodology
		5	Site Selection and Alternatives
		6	Consultation
	2	7	Marine and Coastal Processes
		8	Marine Water and Sediment Quality
		9	Benthic Subtidal and Intertidal Ecology
		10	Fish and Shellfish Ecology
		11	Marine Mammals and Other Megafauna
		12	Offshore and Intertidal Ornithology
		13	Commercial Fisheries
		14	Shipping and Navigation
		15	Military and Civil Aviation
		16	Marine Archaeology and Cultural Heritage
		17	Socioeconomics, Tourism and Recreation
		18	Climate
		19	Infrastructure and Other Users
		20	Major Accidents and Disasters
		21	Summary and Conclusions
	3	Appendix 3.1	Underwater Noise Technical Report
		Appendix 4.1	Offshore Cumulative Effects
		Appendix 4.2	Commitments Register
		Appendix 6.1	Offshore Scoping Report
		Appendix 6.2	Offshore Scoping Opinion
		Appendix 6.3	Offshore HRA Screening Report
		Appendix 7.1	Marine and Coastal Processes Technical Report
		Appendix 8.1	Water Framework Directive Report
		Appendix 9.1	Offshore Baseline Survey Reports
		Appendix 10.1	Fish and Shellfish Ecology Technical Report
		Appendix 10.2	Marine Protected Area Assessment Report
		Appendix 10.3	Ecosystem Level Effects
		Appendix 11.1	Marine Mammal Baseline Technical Report
		Appendix 11.2	iPCoD Modelling Report
		Appendix 12.1	Offshore and Intertidal Ornithology Baseline Technical Report
		Appendix 12.2	Offshore Ornithology Collision Risk Modelling Technical Report
		Appendix 12.3	Offshore Ornithology Distributional Responses Technical Report

Document	Volume	Chapter	Title
		Appendix 12.4	Ornithology Migratory Collision Risk Modelling Technical Report
		Appendix 12.5	Offshore Ornithology MRSea Technical Report
		Appendix 12.6	Offshore Ornithology PVA Technical Report
		Appendix 12.7	Offshore Ornithology Apportionment Report
		Appendix 13.1	Commercial Fisheries Baseline Technical Report
		Appendix 14.1	Navigational Risk Assessment
		Appendix 15.1	Military and Civil Aviation Technical Report
		Appendix 16.1	Marine Archaeology and Cultural Heritage Technical Report
		Appendix 18.1	Greenhouse Gas Technical Report
	4	Appendix 1	Pre-application Consultation Report
		Appendix 2	Outline Environmental Management Plan
		Appendix 3	Outline Decommissioning Programme
		Appendix 4	Marine Pollution Contingency Plan
		Appendix 5	Invasive Non-Native Species Mitigation Plan
		Appendix 6	Outline Marine Mammal Mitigation Protocol
		Appendix 7	Fisheries Mitigation Monitoring and Communication Plan
		Appendix 8	Outline Vessel Management and Navigational Safety Plan
		Appendix 9	Aids to Navigational Management Plan
		Appendix 10	Outline Lighting and Marking Plan
		Appendix 11	Safety Zone Statement
		Appendix 12	Outline Emergency Response and Cooperation Plan
		Appendix 13	Investigation and Protocol for Archaeological Discoveries
		Appendix 14	In Principle Fish Mitigation Plan
HRA	RIAA	Chapter 1	Introduction
		Chapter 2	Marine Mammals
		Chapter 3	Ornithology
		Chapter 4	Fish and Shellfish Ecology
		Chapter 5	Summary
	Derogation Case	-	Aspen OWF Derogation Case
		-	Aspen OWF Compensation Plan

1.3 The Applicant

1.3.1 Cerulean Winds Aspen Project Limited (the Applicant) is a Special Purposed Vehicle (SPV) wholly owned by Cerulean Winds (UKCS) Limited, established to develop the Project. Cerulean Winds (UKCS) Limited is a UK-based green energy infrastructure and transmission developer dedicated to enabling the floating offshore wind sector at scale. Cerulean Winds (UKCS) Limited is committed to developing local skills and capability and supporting the UK's ambition to seize this once-in-a-generation opportunity to invigorate a new sector and drive the transition to net zero. Leveraging the Innovation and Targeted Oil and Gas (INTOG) leasing round, Cerulean Winds (UKCS) Limited is advancing the NSRG through exclusivity agreements over three strategically located sites in the Central North Sea (namely the Aspen Lease Area, for which this consent application relates, as well as the Beech Lease Area and Cedar Lease Area).

1.4 Purpose and Scope of the Addendum

1.4.1 This Addendum presents a combination of Additional Information, which includes new and updated information relevant to the Proposed Development, and specific clarifications to existing information within the consent application submitted in August 2025. It has been prepared to address the requests for Additional Information and clarifications received from MD-LOT based on consultee representations in relation to the Offshore EIAR and HRA.

1.4.2 The information contained within this Addendum either supplements or replaces information previously presented within the Offshore EIAR and HRA, or provides clarification to help understand and interpret existing information contained within the consent application submitted in August 2025. Where this Addendum either supplements or replaces information, the relationship between the Addendum and the original assessment documents is clearly identified within the relevant sections and/or appendices. This Addendum should therefore be read in conjunction with the Offshore EIAR and HRA submitted in August 2025 (see Table 1.1).

1.4.3 This Addendum has been prepared in response to MD-LOT's Request for Additional Information, received on 15 December 2025, in support of the consent applications submitted for the Proposed Development in August 2025. The information contained within this Addendum has been requested by MD-LOT in line with the following:

- Additional information, as defined under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, comprising:
  - Supplementary information relating to matters listed in Schedule 4 of these Regulations which, in the opinion of the Scottish Ministers, is directly relevant to reaching a reasoned conclusion on the significant effects of the development on the environment; and
  - Other relevant information which, in the opinion of the Scottish Ministers, constitutes substantive information to be included within the EIAR and HRA.
- Further information, as defined under Regulation 14(1A) of the Marine Works (Environmental Impact Assessment) Regulations 2007, which is directly relevant to reaching a conclusion on the significant effects of the development.

- Any additional information provided in response to specific clarification points raised by consultees which, in the Applicant's opinion, is relevant to MD-LOT's Request for Additional Information.

1.4.4 This Addendum informs each item identified in MD-LOT's Request for Additional Information, as well as providing specific clarifications where requested. The Addendum also provides some further non-statutory information in relation to marine mammals (**Appendix 4: Marine Mammals and Other Megafauna EIA CIA Updates**), which was not formally requested by MD-LOT but, in the Applicant's opinion, is relevant to MD-LOT's Request for Additional Information. This has been submitted following the review of NatureScot's representation to the consent application, and post-application consultation with NatureScot (see Section 3), to update specific elements of the marine mammals cumulative impact assessment.

2 Legislation and Policy

2.1 Overview

2.1.1 A comprehensive list of policy and legislation relevant to the Proposed Development is presented in **Volume 1, Chapter 2: Policy and Legislative Context** of the Offshore EIAR.

2.1.2 The Applicant maintains ongoing review of relevant legislation, policy, and guidance, including amendments to existing and the introduction of new or emerging measures. This section summarises key legislative and policy developments that have occurred since submission of the Offshore EIAR and HRA in August 2025.

2.2 Sectoral Marine Plan for Offshore Wind Energy

2.2.1 At the time of submission of the consent application on 31 August 2025, the Scottish Government was progressing an updated Sectoral Marine Plan for Offshore Wind Energy (SMP-OWE), anticipated to be finalised in Autumn 2025, as described in **Volume 1, Chapter 2: Policy and Legislative Context** of the Offshore EIAR. A consultation draft of the updated SMP-OWE (Scottish Government 2025a) was published during the preparation of the Offshore EIAR. However, as this document remained in draft form and had not been adopted at the time of submission, this document was not taken into account and the assessment presented in the Offshore EIAR was undertaken with reference to the extant SMP-OWE, first published in October 2020 (Scottish Government, 2020a) as the relevant strategic planning framework.

2.2.2 In May 2025, the Scottish Government consulted on a draft updated SMP-OWE (Scottish Government, 2025a), which incorporated new scientific evidence, policy developments and stakeholder input. The consultation closed in August 2025, and a consultation analysis report was subsequently published in late 2025 (Scottish Government, 2025b). As of February 2026, the final updated SMP-OWE has not yet been formally adopted, and further policy development is ongoing.

2.3 Offshore Wind Policy Statement

2.3.1 The Offshore Wind Policy Statement, originally published in 2020 (Scottish Government, 2020b), set out an ambition to increase Scotland's offshore wind capacity from approximately 2 gigawatts (GW) of operational and under-construction capacity at that time to between 8 and 11 GW by 2030. In June 2025, the Scottish Government consulted on an updated Offshore Wind Policy Statement to reflect changes in the legislative and policy framework and the expansion of the ScotWind and INTOG pipeline to over 40 GW. The consultation also sought views on longer-term ambitions for the sector, including the potential for approximately 40 GW of offshore wind capacity by 2035-2040. Consultation closed in August 2025, and a consultation analysis report was subsequently published (Scottish Government, 2026a).

2.3.2 In January 2026, the Scottish Government formally published the 'Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition' (Scottish Government, 2026b). Within the update document, the Scottish Government confirmed the resetting of its offshore wind policy ambition to up to 40 GW of new offshore wind capacity by 2040, in addition to the already operational or consented capacity (as of August 2025 when the consultation ended). It reaffirmed the Scottish Government's commitment to supporting the delivery of the existing project pipeline, including ScotWind and INTOG projects.

2.4 Scottish Marine Recovery Fund

2.4.1 In July 2025, the Scottish Government published interim guidance on the Scottish Marine Recovery Fund (MRF) (Scottish Government, 2025c), proposing a transition from project-specific, like-for-like compensatory measures toward a more strategic, tiered approach intended to deliver wider benefits at the scale of the Marine Protected Area (MPA) network.

2.4.2 Following publication of the interim guidance, consultation on the proposed Marine Recovery Fund arrangements was undertaken during 2025, with a consultation analysis report published in late 2025 (Scottish Government, 2025d). In parallel, the Scottish Government consulted on a Strategic Compensation Policy for Offshore Wind, with analysis of responses also published subsequently (Scottish Government, 2025e). These initiatives collectively indicate an emerging policy framework for strategic and coordinated compensation; however, as of February 2026, detailed mechanisms and any supporting legislative provisions remain under development.

2.5 Environmental Compensatory Measures Reforms

2.5.1 In July 2025, the Department for Environment, Food and Rural Affairs (Defra) consulted on proposed Environmental Compensatory Measures Reforms (ECMR), intended to provide greater clarity and flexibility in securing environmental compensation for offshore wind developments. The proposals included clarification of the mitigation hierarchy, requirements for additionality, timing of compensation delivery, provision for adaptive management where measures may not achieve the intended ecological outcomes, and strengthened safeguards for irreplaceable marine habitats.

2.5.2 Consultation closed in September 2025, and a Government response and summary of consultation findings were published in late 2025 (Defra, 2025), confirming the intention to proceed with reforms. As of February 2026, implementation of these reforms, including any legislative or regulatory amendments, remains ongoing.

2.6 Scotland's National Marine Plan 2

2.6.1 The Scottish Government is progressing work on the preparation of a second National Marine Plan (Scotland's National Marine Plan 2, NMP2), intended to replace Scotland's National Marine Plan (Scottish Government, 2015). Consultation on a Planning Position Statement was undertaken between November 2024 and February 2025 to seek stakeholder views on early policy proposals and priorities for the future plan (Scottish Government, 2025f). Since submission of the Offshore EIAR and HRA in August 2025, a consultation analysis report has been published and work on plan development has continued. As of February 2026, NMP2 has not yet been adopted, and Scotland's National Marine Plan (Scottish Government, 2015) remains the statutory marine planning framework for decision-making.

3 Consultation

3.1 Overview

3.1.1 A full list of statutory and non-statutory consultees relevant to the Proposed Development who were consulted with during the scoping and pre-application phases is presented in **Volume 1, Chapter 6: Consultation** of the Offshore EIAR.

3.1.2 The Applicant has continued to consult with stakeholders following submission of the consent applications in August 2025 throughout the determination period, as summarised in Table 3.1.

Table 3.1 Stakeholder Engagement Activities During the Determination Phase

Date	Stakeholder	Technical Topic	Summary
04 September 2025	Scottish Fishermen's Federation (SFF), Scottish White Fish Producers Association (SWFPA), and Scottish Pelagic Fishermen's Association (SPFA)	Commercial Fisheries	Meeting with fisheries representatives to discuss the Fisheries Mitigation, Monitoring and Communication Plan (FMMCP; **Volume 4, Appendix 7: Fisheries Mitigation, Monitoring and Communication Plan** of the Offshore EIAR) and commercial fisheries impact assessment (**Volume 2, Chapter 13: Commercial Fisheries** of the Offshore EIAR). The discussion focused on significant impacts to the demersal otter trawl fleet and construction-phase impacts to other fleets, and outlined proposed secondary mitigation including Obstacle Free Zones (OFZs), Disruption Agreements and an In Principle Fish Mitigation Plan (**Volume 4, Appendix 14: In Principle Fish Mitigation Plan** of the Offshore EIAR). Detailed consideration was given to the eastern and western OFZs, with SFF supporting the eastern OFZ but indicating the western OFZ may require extension to reflect fishing activity and safe pipeline crossings, with further information to be provided. SFF also requested removal of references to FLOWW guidance from the FMMCP, and it was agreed that a follow-up meeting would be arranged to continue discussions.
19 November 2025	SFF	Commercial Fisheries	Meeting with SFF to discuss its counter-proposal to the Applicant's proposed OFZs and potential refinements to the western OFZ to address fishing safety concerns. SFF outlined the need for greater western OFZ coverage in relation to Nephrops trawl activity and ensure safe crossing of the pipeline south of the Aspen Array Area, while confirming no changes were sought to the eastern OFZ. The Applicant reiterated that the current 12% OFZ extent represents the maximum acceptable without affecting project viability but confirmed willingness to refine the western OFZ shape within this limit to improve safety, with further discussions subsequently held on 02 February 2026 (see below).
10 December 2025	MD-LOT	General	Quarterly catch-up.
15 December 2025	MD-LOT	General	Request for Additional Information received by email.

Date	Stakeholder	Technical Topic	Summary
23 December 2025	NatureScot	Offshore Ornithology Marine Mammals	Correspondence between the Applicant and NatureScot to support ongoing engagement in relation to marine mammals and offshore ornithology matters raised in NatureScot's representation to the consent application.
26 January 2026	Ministry of Defense (MoD)	Military and Civil Aviation	Meeting with MoD to discuss its consultation response to the Proposed Development's consent application. MoD raised an objection based on anticipated impacts on the Air Defence Radar at Remote Radar Head Buchan, noting that a suitable mitigation scheme has not yet been agreed. The Applicant has identified Programme NJORD, a specialised MoD procurement initiative designed to acquire and implement technological solutions that mitigate the adverse effects of OWFs on UK Air Defence radar systems, as a potential mitigation pathway.
26 January 2026	National Air Traffic Services (NATS)	Military and Civil Aviation	Meeting with NATS to discuss its consultation response to the Proposed Development's consent application. NATS raised an objection based on anticipated impacts on en-route radar, as set out in the Technical and Operational Assessment (NATS' radar safeguarding assessment). The discussion focused on NATS' assessment of predicted radar impacts, the basis for its operational conclusions, and the information and evidence required to support the identification and appraisal of potential mitigation options.
02 February 2026	SFF	Commercial Fisheries	Meeting with SFF to discuss the Proposed Development's FMMCP (**Volume 4, Appendix 7: Fisheries Mitigation, Monitoring and Communication Plan** of the Offshore EIAR) and commercial fisheries impact assessment. The discussion covered key predicted impacts on fishing activity (including displacement, access restrictions and gear conflict), proposed mitigation measures such as OFZs and disruption agreements, and the approach to monitoring and ongoing engagement with the fishing industry to refine mitigation post-consent.
04 February 2026	NatureScot	Offshore Ornithology Marine Mammals	Advice received from NatureScot responding to the Applicant's correspondence issued on 23 December 2025 regarding offshore ornithology and marine mammals matters raised in NatureScot's representation to the consent application.

3.2 Request for Additional Information

3.2.1 The Applicant received the formal Request for Additional Information from MD-LOT on 15 December 2025, in accordance with the following:

- Regulation 14 of the Marine Works (Environmental Impact Assessment) Regulations 2007;
- Regulation 21 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017; and
- Regulation 19 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

3.2.2 The Request for Additional Information states that the Additional Information is necessary for MD-LOT to reach a reasoned conclusion on the likely significance of effects of the Proposed Development on the environment. MD-LOT also raised several points of clarification arising from the consultation responses received.

3.2.3 Within MD-LOT's Request for Additional Information, two types of response are required from the Applicant:

(i) Additional Information required in accordance with the following:

- Regulation 21 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017;
- Regulation 19 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017; and
- Regulation 14 of the Marine Works (Environmental Impact Assessment) Regulations 2007.

(ii) Clarifications arising from consultation responses received by MD-LOT in relation to the consent application.

3.2.4 This Addendum includes material provided in response to both elements of MD-LOT's request, as well as further non-statutory information relating to marine mammals (as noted in Section 1.4).

3.2.5 For the purposes of this Addendum:

- Responses to requests for Additional Information are deemed statutory and comprise the provision of new or supplementary environmental information, including updated assessment, modelling or analysis, undertaken following submission of the Offshore EIAR and HRA; and
- Responses to requests for Clarification are deemed non-statutory and comprise explanatory text, confirmation of assumptions, reconciliation of data, or other supporting information provided to aid interpretation of environmental assessment information already contained within the consent application, and do not include new environmental assessment.

3.2.6 Hereafter in this Addendum, references to “additional information” and “clarifications” should be read in accordance with the above. It is also reiterated that that the submission relating to marine mammals (as noted in Section 1.4, and presented in **Appendix 4: Marine Mammals and Other Megafauna EIA CIA Updates** of this Addendum) forms further non-statutory information which, in the Applicant’s opinion, is relevant to MD-LOT’s Request for Additional Information.

3.2.7 The details on the Request for Additional Information, in addition to signposting to where this information is contained within this Addendum, is presented in Table 3.2.

3.2.8 This Addendum document is accompanied by the Gap Analysis spreadsheet, which has been submitted to MD-LOT and contains the Applicant’s responses to individual consultee representations.

Table 3.2 Summary of Request for Additional Information and Clarifications from MD-LOT

Technical Topic	Point Raised	Section and/or Appendix of This Addendum Where Point Raised is Addressed
Blue Carbon	Additional Information MD-LOT requires that the following must be submitted as Additional Information on the basis of the NatureScot representation: ▪ Rationale why a blue carbon assessment was not possible, or, alternatively, a blue carbon assessment must be presented. ▪ Any justification for not undertaking a blue carbon assessment, or any assessment provided must align with the advice provided in the Scoping opinion adopted for the project by Scottish Ministers on 12 May 2025, and the NatureScot advice contained therein. The Applicant is directed to the NatureScot representation for further details regarding blue carbon assessments.	A blue carbon assessment has been undertaken in response to MD-LOT's request, aligned with the advice provided in the Scoping Opinion and NatureScot's representation. This is provided in **Appendix 1: Blue Carbon Assessment** of this Addendum, with a summary provided in Section 5.2 of this Addendum.
Offshore Ornithology	Additional Information MD-LOT requires that the following must be submitted as Additional Information on the basis of the NatureScot representation: Determination of guillemot regional populations for EIA The methodology for determining non-breeding population for guillemot is non-standard and has resulted in a significant range in predicted population size impacts. Population Viability Analysis ("PVA") must be re-run for guillemot cumulative impacts, using the extended foraging range approach (153.7 km). Apportioning Impacts to Special Protection Areas ("SPA") The approach to apportioning impacts to SPAs for guillemot does not reflect advice provided to the Developer by NatureScot and will result	The PVA for guillemot has been re-run using the extended foraging range approach, and this approach to SPA apportioning has been updated in line with NatureScot advice. In-combination PVA analyses have been undertaken for gannet, kittiwake, razorbill, and great black-backed gull for the relevant SPAs listed. A 'without Berwick Bank' scenario has also been included within the in-combination assessment. Additional information is provided in **Appendix 2: Offshore Ornithology EIAR and RIAA Updates** and **Appendix 3: Offshore Ornithology PVA Technical Report** of this Addendum, with a summary of results and clarifications provided in Section 5.3 of this Addendum.

Technical Topic	Point Raised	Section and/or Appendix of This Addendum Where Point Raised is Addressed
	in an underestimate of impacts. To enable the assessment of impacts to guillemot SPA populations, PVA for guillemot must be rerun (using the extended foraging range approach) for the proposal alone and in-combination impacts at Buchan Ness to Collieston Coast SPA, Fowlsheugh SPA and Troup, Pennan and Lion's Head SPA. Furthermore, predicted impacts apportioned to Calf of Eday SPA and Hoy SPA exceed 0.02 percentage point change. PVA must be undertaken for the proposal alone and in-combination impacts to great black-backed gull at the Calf of Eday SPA and Hoy SPA. PVA The requisite information has not been provided to fully assess the in-combination impacts for following sites and species and a conclusion on adverse effect on site integrity cannot be reached. In-combination PVA analysis must be undertaken for the sites and species where an impact of 0.2 to 1.0 birds per annum is predicted as outlined below: ▪ Gannet - Fair Isle SPA, North Rona and Sula Sgeir SPA, St Kilda SPA, and Sule Skerry and Sule Stack SPA ▪ Kittiwake - East Caithness Cliffs SPA, Forth Islands SPA, North Caithness Cliffs SPA, and Troup, Pennan and Lion's Head SPA ▪ Razorbill - Troup, Pennan and Lion's Head SPA The Applicant is directed to the NatureScot representation for further details and instructions on resolving improving confidence in the assessments provided.	

Technical Topic	Point Raised	Section and/or Appendix of This Addendum Where Point Raised is Addressed
	Clarifications MD-LOT requires the following should be clarified on the basis of consultee representations: ▪ Clarification that displacement rates presented in Tables 2.4 and 2.5 in Appendix 12.3 also cover non-breeding seasons. ▪ Clarification on differences in the numbers presented for great black-backed gull in Appendix 12.6 (Table 3.27), which do not match those presented in Volume 2, Chapter 12 (Table 12.50). The Applicant is directed to the NatureScot representation for further details. **Requirement for a 'Without Berwick Bank Scenario'** MD-LOT advise that inclusion of a 'without Berwick Bank scenario' in the in-combination assessments is at the discretion of the Developer. This scenario would represent a situation where the adverse effects of Berwick Bank offshore wind farm is fully compensated for. While omission of this scenario will not prevent progression of the application, it may result in a greater level of effect being identified in the Appropriate Assessment. Should the Developer choose to provide this 'without Berwick Bank scenario' to support its application, it would be considered additional information, and therefore require publication and consultation alongside the additional information and clarifications requested above.	

Technical Topic	Point Raised	Section and/or Appendix of This Addendum Where Point Raised is Addressed
Marine Mammals	Clarifications MD-LOT requires the following should be clarified on the basis of consultee representations: ▪ Clarification on how the impact range for suction anchor installation was calculated, due to the high Permanent Threshold Shift ("PTS") impact to harbour porpoise. ▪ Clarification on the percentage of the population, of each marine mammal species assessed, impacted by piling disturbance using the UK portion of the Management Units. ▪ Clarification on how species densities were derived for the marine mammal cumulative assessment. ▪ Clarification on the number of proposed piling days assessed due to discrepancy noted between the EIA, and Interim Population Consequences of Disturbance Model ("iPCoD") modelling. The Applicant is directed to the NatureScot representation for further details.	Clarification has been provided in relation to the calculation of impact ranges for suction anchor installation, the percentage of marine mammal populations assessed as impacted by piling disturbance, the derivation of species densities for the cumulative assessment, and the number of proposed piling days assessed within the iPCoD modelling. Responses to marine mammals clarifications are provided in Section 5.4 of this Addendum. Further non-statutory information relating to the marine mammals cumulative impact assessment, linked to the derivation of species densities clarification, has also been submitted in **Appendix 4: Marine Mammals and Other Megafauna EIA CIA Updates** of this Addendum.
Turbot Bank Nature Conservation Marine Protected Area (ncMPA)	Clarifications MD-LOT requires the following should be clarified on the basis of consultee representations: ▪ Clarification of the extent of Suspended Sediment Concentration that will be deposited within the Turbot Bank ncMPA, as there are contradictions between, and within, EIA chapters. The Applicant is directed to the NatureScot representation for further details.	Clarification has been provided in relation to the extent of Suspended Sediment Concentration (SSC) predicted to be deposited within the Turbot Bank ncMPA. This is provided in Section 5.5 of this Addendum.

Technical Topic	Point Raised	Section and/or Appendix of This Addendum Where Point Raised is Addressed
Socio-cultural and Socio-economics	**Clarifications** MD-LOT requires the following should be clarified on the basis of consultee representations: Socio-cultural impacts ▪ Clarification on why a socio-cultural impact assessment was not undertaken despite advice provided in the scoping opinion advising it should be scoped in. Alternatively, a socio-cultural impact assessment should be undertaken and provided. Socio-economic impacts ▪ A shortlist of ports (4-5 potential ports) should be outlined for the operation and maintenance phase, rather than analysing data at local authority, or higher, level. This is to enable the MAU [Marine Analytical Unit] to provide comment on the cumulative social impacts, in terms of benefits or costs, of the project. The Applicant is directed to the MAU advice for further details.	Clarification has been provided in relation to the approach to socio-cultural impact assessment presented within the Offshore EIAR, including the basis on which potential impacts to community character, image or quality of life were not assessed at application stage in the absence of defined key infrastructure locations and the need for primary stakeholder research. It has not been possible to provide a shortlist of potential ports for the operation and maintenance phase as this will depend on a range of factors that will be determined at later stages of project development, including technical requirements, vessel strategy, commercial arrangements, and availability of suitable infrastructure at the time of procurement. Responses to socio-cultural and socio-economic clarifications are provided in Section 5.6 of this Addendum.

4 Proposed Development Description

4.1 Overview

4.1.1 The Array Area of the Proposed Development is located in the North Sea, approximately 84 km east of Peterhead off the east coast of Scotland (Figure 4.1). The Aspen Array Area covers approximately 333 km² and forms the offshore electricity generation site of the Proposed Development.

4.1.2 The Proposed Development comprises the offshore infrastructure within the Aspen Array Area, including WTGs, floating foundations, mooring and anchoring systems, OSPs, IACs, and Inter-link Cables, together with the OTC Corridor which connects the Aspen Array Area to landfall.

4.1.3 The Aspen Array Area will contain up to 72 WTGs installed on floating foundations. Each WTG will typically comprise a tower, nacelle, hub and three blades, mounted on a floating substructure and secured to the seabed via mooring lines and anchors. The Aspen Array Area will also include IACs of up to approximately 300 km in total length, connecting individual turbines to one another and to the OSPs.

4.1.4 The Proposed Development may include up to three OSPs located within the Aspen Array Area. These will collect and transform electricity generated by the WTGs prior to export to shore via the offshore transmission cables. Inter-link cables may also be installed between OSPs, depending on the final electrical design.

4.1.5 Electricity will be exported to shore via the OTC Corridor, which covers an area of approximately 713 km² and may contain up to four OTCs, each up to approximately 155 km in length, extending from the Aspen Array Area to landfall (Figure 4.1). At the shoreline, cables will be installed using trenchless techniques, such as horizontal directional drilling or direct pipe, to minimise disturbance within the intertidal zone.

4.1.6 Landward of MHWS, the onshore transmission cable corridor and onshore substation will form part of the wider Aspen project but are assessed separately within the Onshore EIAR.

4.1.7 Construction of the Proposed Development is anticipated to take place over a period of up to four years, with offshore works currently expected to occur between approximately 2028 and 2031, following a programme of pre-construction surveys and site investigations.

4.1.8 Further details of the design envelope and key parameters are provided in **Volume 1, Chapter 3: Project Description** of the Offshore EIAR. An outline description of the Proposed Development is presented in Table 4.1.

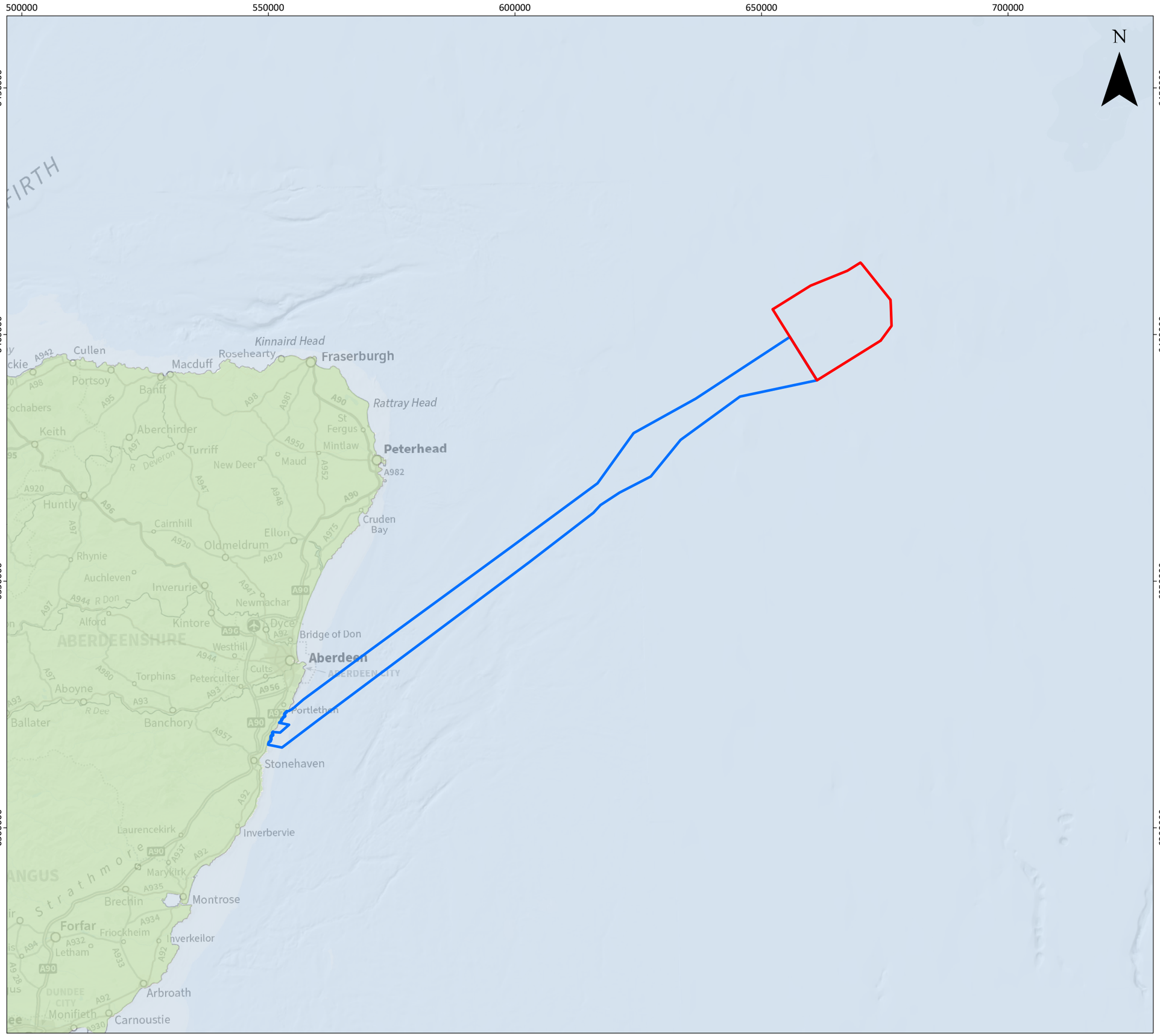


Figure Reference: ASPEN_ADDENDUM_Fig4.1_ProposedDevelopmentLocation_v1

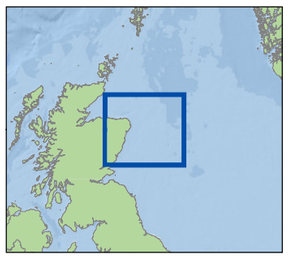
CERULEAN WINDS

Aspen Offshore Wind Farm
Additional Information

Proposed Development Location

Legend

- Aspen Array Area
- Offshore Transmission Cable Corridor



Notes

Esri, Garmin, GEBCO, NOAA NGDC, and other contributors
Contains Ordnance Survey data © Crown copyright and database rights (2024). OS OpenData.

Coordinate System:
WGS 1984 UTM Zone 30N

0 20 40 km

0 10 20 nm

Scale	Date	Drawn by	Checked by	Approved by
1:750,000 @A3	25/02/2026	BPHB	NC	SB

Cerulean Winds
24/25 The Shard,
32 London Bridge Street,
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SE1 9SG

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GoBe APEMGroup

Figure 4.1

Table 4.1 Key Parameters of the Proposed Development

Design Parameters	Design Envelope
Maximum number of WTGs	72
WTG foundation type	Floating
Maximum floating foundations	72
Maximum floater dimensions	125 m x 110 m x 40 m
Maximum number of mooring lines per floating foundation	6
Mooring types	Taut, semi-taut or catenary
Anchor types	Driven piled or suction
Maximum number of OSPs	3
OSP foundation type	Fixed bottom
Maximum number of OTCs	4
Maximum total length of OTCs	620 km
Maximum total length of IACS and Inter-link Cables	300 km

5 Environmental Effects

5.1 Overview

5.1.1 This section of the Addendum presents a summary of the likely significant effects on the environment in relation to the outputs from MD-LOT's Request for Additional Information. The Addendum is accompanied by technical appendices (Table 5.1), which are signposted in the relevant sections of this document.

Table 5.1 Technical Appendices and Their Relevant Technical Topic

Technical Topic	Appendix Number and Title
Blue Carbon Assessment	**Appendix 1: Blue Carbon Assessment**
Offshore Ornithology	**Appendix 2: Offshore Ornithology EIAR and RIAA Updates** **Appendix 3: Offshore Ornithology PVA Technical Report**
Marine Mammals and Other Megafauna	**Appendix 4: Marine Mammals and Other Megafauna EIA CIA Updates**

5.2 Blue Carbon Assessment

5.2.1 The Applicant received a request for additional information from MD-LOT, based on the NatureScot representation, which stated that either a rationale should be provided explaining why a blue carbon assessment was not possible, or alternatively that a blue carbon assessment should be presented. MD-LOT further advised that any justification or assessment provided should align with the advice contained within the Offshore Scoping Opinion adopted for the Project by Scottish Ministers on 12 May 2025 and the NatureScot advice contained therein (see **Volume 3, Appendix 6.2: Offshore Scoping Opinion** of the Offshore EIAR).

5.2.2 A blue carbon assessment was not included within the Offshore EIAR submitted for the Proposed Development. In response to the MD-LOT request, the Applicant has undertaken a Blue Carbon Assessment to address the information gap identified, as presented in **Appendix 1: Blue Carbon Assessment** of this Addendum.

5.2.3 The Blue Carbon Assessment has been prepared in line with emerging best practice and available guidance, including relevant literature and datasets relating to marine sedimentary carbon stores and blue carbon habitats, and reflects the advice provided by NatureScot. The assessment considers the potential impacts of the Proposed Development on blue carbon habitats and carbon stores, primarily through disturbance of seabed sediments and associated potential release of organic carbon. The assessment is largely qualitative, supplemented by quantitative analysis where sufficient data were available.

5.2.4 The assessment considers potential impacts across all phases of the Proposed Development, including construction, operation and maintenance, and decommissioning. Impact pathways assessed include temporary and permanent habitat disturbance, increases in suspended sediment concentrations (SSCs), changes in physical processes, and indirect effects associated with displacement of fishing activity.

5.2.5 Baseline conditions were characterised using a combination of site-specific survey data and publicly available datasets to identify the presence and characteristics of blue carbon habitats within the Aspen Array Area and OTC Corridor. The study area was aligned with the benthic subtidal and intertidal ecology study areas presented within the Offshore EIAR to ensure consistency of assessment.

5.2.6 The assessment focused on the organic carbon fraction of sediments and habitats, as this component has the potential to be remineralised and released as carbon dioxide following disturbance, and is therefore relevant to greenhouse gas emissions and climate change considerations.

5.2.7 Potential carbon release from sediment disturbance was estimated using recognised datasets and literature values for organic carbon density, combined with estimates of worst-case disturbance footprints derived from the design envelope for the Proposed Development.

5.2.8 The results of the Blue Carbon Assessment, including the evaluation of likely significant effects, mitigation and monitoring considerations where relevant, are presented in **Appendix 1: Blue Carbon Assessment** of this Addendum.

5.2.9 The conclusions of the assessment indicate that the potential impacts of the Proposed Development on blue carbon habitats and carbon stores are limited in spatial extent and are not expected to result in likely significant effects when considered within the context of baseline conditions, sediment characteristics, and recovery processes.

5.3 Offshore Ornithology

EIAR and RIAA

5.3.1 The Applicant received a request for additional information from MD-LOT, based on the NatureScot representation, which identified a requirement for further work in relation to offshore ornithology. In particular, MD-LOT highlighted the need to refine the determination of regional populations for guillemot used within the EIA. The methodology applied for determining the non-breeding population was identified as non-standard and resulting in predicted impacts at variance with a standard approach. MD-LOT therefore requested that PVA for guillemot cumulative impacts be re-run using the extended foraging range approach (153.7 km). The updated assessments presented within this Addendum supersede the relevant offshore ornithology assessment outputs and conclusions reported in **Volume 2, Chapter 12: Offshore Ornithology** of the Offshore EIAR.

5.3.2 MD-LOT also requested further information in relation to the Report to Inform Appropriate Assessment (RIAA) as part of the HRA process, specifically regarding the approach to apportioning impacts to Special Protection Areas (SPAs). The approach presented was identified as not fully reflecting advice provided by NatureScot and potentially underestimating impacts to SPA populations. To address this, MD-LOT requested that PVA for guillemot be re-run using the extended foraging range approach for both the Proposed Development alone and in-combination assessments for the following SPAs:

- Buchan Ness to Collieston Coast SPA;
- Fowlsheugh SPA; and
- Troup, Pennan and Lion's Head SPA.

5.3.3 In addition, MD-LOT noted that predicted impacts apportioned to Calf of Eday SPA and Hoy SPA exceeded a 0.02 percentage point change threshold for great black-backed gull. MD-LOT therefore requested that PVA be undertaken for great black-backed gull for both the Proposed Development alone and in-combination assessments for these SPAs.

5.3.4 MD-LOT further advised that sufficient information had not been provided to fully assess in-combination impacts for several sites and species, and that conclusions on Adverse Effects on Site Integrity (AEoSI) could not be reached. MD-LOT requested that in-combination PVA analyses be undertaken for sites and species where impacts of between 0.2 and 1.0 birds per annum were predicted. These included:

- Gannet:
  - Fair Isle SPA;
  - North Rona and Sula Sgeir SPA;
  - St Kilda SPA; and
  - Sule Skerry and Sule Stack SPA.
- Kittiwake:
  - East Caithness Cliffs SPA;
  - Forth Islands SPA;
  - North Caithness Cliffs SPA; and
  - Troup, Pennan and Lion's Head SPA.
- Razorbill:
  - Troup, Pennan and Lion's Head SPA.

5.3.5 MD-LOT directed the Applicant to the NatureScot representation for further detail on the requirements for revising assessments and improving confidence in the ornithological impact assessments.

5.3.6 The Applicant has undertaken and fully addressed each of the additional analyses requested by MD-LOT based on NatureScot's representation. This includes updated regional population estimates for guillemot, revision of SPA apportioning approaches, re-run of PVA for guillemot using the extended foraging range approach (153.7 km) and updated in-combination PVA modelling for relevant species and SPAs (see Table 3.2).

5.3.7 Details of the updates to the EIAR and HRA documentation, including revised assessments and clarifications, are presented in following appendices of this Addendum:

- Appendix 2: Offshore Ornithology EIAR and RIAA Updates; and
- Appendix 3: Offshore Ornithology PVA Technical Report, which provides full details of the updated PVAs, including modelling assumptions, parameters and outputs.

5.3.8 The additional analyses undertaken in response to the MD-LOT and NatureScot request have resulted in revisions to the guillemot regional population used within the EIA, updates to the apportioning of impacts to SPA populations within the RIAA, and the completion of additional project-alone and in-combination PVA modelling for relevant SPA populations.

5.3.9 For guillemot, the regional breeding season population has been recalculated using the extended mean-maximum foraging range plus one standard deviation approach (153.7 km), resulting in a revised reference population of 274,189 individuals. This approach aligns the assessment with current NatureScot advice for far-offshore wind developments and provides consistency in cumulative impact assessment. Impacts have also been re-apportioned to Buchan Ness to Collieston Coast SPA, Fowlsheugh SPA, and Troup, Pennan and Lion's Head SPA using the Fair Isle extended foraging range methodology.

5.3.10 In addition, project-alone and in-combination PVAs have been undertaken where requested for SPA populations of guillemot, great black-backed gull, gannet, kittiwake, razorbill and puffin where predicted impacts meet or exceed 0.2 birds per annum. These assessments apply updated demographic parameters and the most recent SPA population counts obtained from the Seabird Monitoring Programme (SMP) database (BTO, 2026). In-combination totals have been revised using the most recent publicly available impact data from relevant offshore wind projects and assessed under 'all projects', 'excluding consented projects committed to compensation (ECPCC)', and 'without Berwick Bank' scenarios. The ECPCC scenario has been included on a precautionary basis, acknowledging this has not been requested by MD-LOT.

5.3.11 The updated PVA outputs, including the proportion of counterfactual growth rate (CGR) and counterfactual population size (CPS), have been used to inform the revised conclusions on AEoSI which were presented within the RIAA.

Gannet and Puffin

5.3.12 Updated PVA results indicate that for gannet and puffin, the Proposed Development alone does not result in a reduction in CGR below 0.995 for any assessed SPA. In-combination CGR values for gannet at Fair Isle SPA, Sule Skerry and Sule Stack SPA, North Rona and Sula Sgeir SPA and St Kilda SPA, and for puffin at Forth Islands SPA, remain equal to or exceed 0.995 across all cumulative scenarios, including the ECPCC scenario. These results indicate that no AEoSI is predicted for these SPA populations in-combination.

Kittiwake

5.3.13 Updated in-combination PVA results indicate that for certain SPA populations, including kittiwake at Fowlsheugh, East Caithness Cliffs, North Caithness Cliffs and Forth Islands SPAs, the proportion of CGR falls below 0.995 under 'all projects' cumulative scenarios. However, under the ECPCC scenario, which excludes projects consented on the basis of delivering secured seabird compensation measures, CGR values are generally equal to or exceed 0.995. The updated analyses therefore support the conclusions of the RIAA with respect to the Proposed Development alone and in-combination, taking account of secured compensation measures within the wider offshore wind programme.

Great Black-backed Gull

5.3.14 Updated PVA results for great black-backed gull indicate that the Proposed Development alone does not result in a reduction in CGR below 0.995 for any assessed SPA. In-combination CGR values for Calf of Eday SPA remain equal to or exceed 0.995 across all cumulative scenarios. However, for Hoy SPA and Copinsay SPA, in-combination CGR values fall below 0.995 across all cumulative scenarios, including the ECPCC scenario. These results have been considered within the revised RIAA assessment of in-combination effects for these SPAs and are reflected in the conclusions on AEoSI.

Guillemot

5.3.15 Updated PVA results for guillemot indicate that whilst the Proposed Development alone does not result in a reduction in CGR below 0.995 for any assessed SPA, in-combination CGR values for Buchan Ness to Collieston Coast SPA, Fowlsheugh SPA and Troup, Pennan and Lion's Head SPA fall below 0.995 across all cumulative scenarios, including the ECPCC scenario. These results have been considered within the revised RIAA assessment of in-combination effects for these SPAs and are reflected in the conclusions on AEoSI.

Razorbill

5.3.16 For razorbill at Troup, Pennan and Lion's Head SPA, updated PVA results indicate that the Proposed Development alone does not reduce CGR below 0.995. In-combination, CGR values remain ≥0.995 under the Guidance Low approach but fall marginally below 0.995 under the Guidance High approach across the assessed cumulative scenarios, including the ECPCC scenario. These outputs have been considered within the revised RIAA conclusions for this SPA.

5.3.17 Further to the requirements for additional information, MD-LOT requested clarification on specific aspects of the ornithological assessment presented within the Offshore EIAR. These included:

- Confirmation that displacement rates presented in Tables 2.4 and 2.5 of Appendix 12.3: Offshore Ornithology Distributional Responses Technical Report of the Offshore EIAR, apply to both breeding and non-breeding seasons; and
- Clarification of differences in values presented for great black-backed gull between Volume 3, Appendix 12.6: Offshore Ornithology PVA Technical Report and Volume 2, Chapter 12: Offshore Ornithology of the Offshore EIAR.

5.3.18 The Applicant confirms that the displacement rates presented in Tables 2.4 and 2.5 of **Volume 3, Appendix 12.3: Offshore Ornithology Distributional Responses Technical Report** of the Offshore EIAR apply to both breeding and non-breeding seasons unless otherwise stated. The assessments presented within the Offshore EIAR considered displacement across the relevant seasonal periods in accordance with the assessment methodology.

5.3.19 Differences in values reported for great black-backed gull between **Volume 3, Appendix 12.6: Offshore Ornithology PVA Technical Report** and **Volume 2, Chapter 12: Offshore Ornithology** of the Offshore EIAR have been reviewed. The Applicant confirms that the Median CGR and Median CPS values presented for the Applicant's Approach (Annual Total – Regional cumulative scenario at 35 years) in Table 3.27 of **Volume 3, Appendix 12.6: Offshore Ornithology PVA Technical Report** of the Offshore EIAR were transcribed incorrectly from the final PVA model outputs during preparation of the technical report. The correct values from the PVA runs are those presented in Table 12.50 of **Volume 2, Chapter 12: Offshore Ornithology** of the Offshore EIAR (i.e., median CGR = 0.986 and median CPS = 0.599 for the Applicant Approach; and median CGR = 0.986 and median CPS = 0.597 for the Guidance Approach).

5.3.20 The Offshore EIAR assessment and conclusions in respect of great black-backed gull are informed by the PVA outputs reported in **Volume 2, Chapter 12: Offshore Ornithology** of the Offshore EIAR and do not refer to the incorrect values presented in Table 3.27 of **Volume 3, Appendix 12.6: Offshore Ornithology PVA Technical Report** of the Offshore EIAR. The Applicant therefore confirms that no material difference to the conclusions of the Offshore EIAR arises.

5.3.21 While not formally identified by MD-LOT as part of Request for Additional Information, the Applicant has reviewed the wider representation provided by NatureScot, which highlighted that sabbatical rates (i.e., the proportion of adult birds not breeding in a given year) were not considered when assessing impacts within the RIAA. Consideration of the sabbatical rates leads to a reduction in impacts (as fewer birds are apportioned to individual SPAs) and as such, the Applicant's impacts as presented in the RIAA are considered to contain additional precaution as a result of not removing sabbaticals from the assessment. All updates provided in response to requests for Additional Information are also based on this more precautionary approach. The Applicant considers that the use of sabbaticals within the RIAA would not make any material difference to the conclusions of the assessments presented.

5.3.22 The Applicant considers that in light of potential requirements to provide compensation, compensation quanta (i.e., the amount of compensation required to be delivered by the Applicant, if necessary) should be informed by impacts derived using the Guidance Approach. Likewise, projects looking to determine in-combination impacts should have access to impacts calculated in a manner consistent with other projects. As such, the project-alone impacts that consider the sabbatical rates, as published in Horswill and Robinson (2015), are presented in Table 5.2. It is noted that Table 5.2 does not include data on great black-backed gull and gannet as Horswill and Robinson (2015) did not publish sabbatical rates for these species.

5.3.23 Whilst aspects of the offshore ornithology assessment have been updated within this Addendum (including SPA apportioning and in-combination PVA analyses), the assessment of effects reported in the RIAA, as updated in **Appendix 2: Offshore Ornithology EIAR and RIAA Updates** of this Addendum, and the associated conclusions on AEoSI, remain based on impacts derived without the application of sabbatical rates. The project-alone impacts which account for sabbatical rates (as presented in Table 5.2) represent the appropriate guidance-compliant basis for informing any subsequent determination of compensation requirements and offshore wind programme-level in-combination assessment. Scottish Ministers should therefore rely on the updated RIAA assessment (as presented in **Appendix 2: Offshore Ornithology EIAR and RIAA Updates** of this Addendum) for the purposes of Appropriate Assessment, and on the sabbatical-adjusted values presented in Table 5.2 where compensation requirements or programme-level in-combination effects are being determined, if necessary.

5.3.24 Table 5.2 presents both the predicted project-alone impacts and the predicted impacts following application of species-specific sabbatical rates (as defined by Horswill and Robinson, 2015). The 'Predicted Impact' columns present a precautionary estimate based on the assumption that all breeding adults are present at the colony during the relevant impact pathway (see Table 2.10 of **Appendix 2: Offshore Ornithology EIAR and RIAA Updates** of this Addendum), whilst the 'Predicted Impact with Sabbatical Rate Considered' columns apply the relevant sabbatical rate to these values for the purposes described in paragraph 5.3.23.

Table 5.2 Predicted Project-alone Impacts to Guillemot, Razorbill, Puffin, and Kittiwake at SPA Sites, Presented as Low and High Estimates and Adjusted Using Species-specific Sabbatical Rates in Accordance with Horswill and Robinson (2015)

Species	SPA	Predicted Impact*		Sabbatical Rate (%)	Predicted Impact With Sabbatical Rate Considered	
		Low	High		Low	High
Guillemot	Buchan Ness to Collieston Coast	5.54	15.03	7.9	5.10	13.84
Guillemot	Fowlsheugh	10.56	28.62	7.9	9.72	26.36
Guillemot	Troup, Pennan and Lion's Heads	5.62	15.24	7.9	5.18	14.04
Razorbill	Troup, Pennan and Lion's Heads	0.38	0.64	3.0	0.37	0.62
Puffin	Forth Islands	2.05	3.66	7.8	1.89	3.37
Kittiwake	Buchan Ness to Collieston Coast	1.18	1.31	19.4	0.95	1.06
Kittiwake	East Caithness Cliffs	0.72	0.82	19.4	0.58	0.66
Kittiwake	Forth Islands	0.21	0.24	19.4	0.17	0.19
Kittiwake	Fowlsheugh	1.03	1.14	19.4	0.83	0.92
Kittiwake	North Caithness Cliffs	0.44	0.50	19.4	0.35	0.40
Kittiwake	Troup, Pennan and Lion's Head	0.37	0.41	19.4	0.30	0.33

* See Table 2.10 of **Appendix 2: Offshore Ornithology EIAR and RIAA Updates** of this Addendum for predicted impact values.

5.4 Marine Mammals

Clarifications

5.4.1 MD-LOT, based on the NatureScot representation, requested clarification on specific aspects of the marine mammal assessment presented within the Offshore EIAR. These included:

- Clarification on how the impact range for suction anchor installation was calculated, due to the predicted PTS impact to harbour porpoise;
- Clarification on the percentage of the population of each marine mammal species assessed that may be impacted by piling disturbance, using the UK portion of the relevant Management Units;
- Clarification on how species densities were derived for the marine mammal cumulative assessment; and
- Clarification on the number of proposed piling days assessed, due to a discrepancy noted between the EIAR and Interim Population Consequences of Disturbance (iPCoD) modelling.

5.4.2 The Applicant has reviewed each of these points and provides the following clarifications, noting these were consulted upon with NatureScot as part of a Clarification Note (see Table 3.1).

5.4.3 The impact range presented in the Offshore EIAR for suction anchor installation was derived from the underwater noise assessment (**Volume 3, Appendix 3.1: Underwater Noise Technical Report** of the Offshore EIAR). At the time of the assessment, empirical data on underwater noise from suction bucket or anchor installation were extremely limited, and the assessment adopted a highly precautionary approach.

5.4.4 Specifically, the assessment was based on measurements reported by Koschinski and Lüdemann (2019), which recorded sound levels of approximately 137 dB SPLRMS at 750 m and assumed continuous exposure over a 24-hour period. These assumptions were applied conservatively in order to ensure that potential impacts, including PTS to harbour porpoise, were not underestimated.

5.4.5 Subsequent review of the available evidence indicates that the measured sound levels in Weilgart (2023) are now considered likely to represent background noise rather than noise generated by suction machinery, and more recent literature indicates that suction anchor installation noise may be negligible relative to typical vessel noise. The assumptions applied in the EIAR are therefore considered to represent a precautionary and conservative estimate of potential effects.

5.4.6 The Applicant confirms that, should suction anchors be taken forward, updated review of available evidence and, where appropriate, updated calculations would be undertaken post-consent as part of the Piling Strategy and Marine Mammal Mitigation Plan (MMMP), once final installation parameters are confirmed. These refinements are not expected to increase predicted impact ranges.

5.4.7 It is noted that in response to the above information submitted as part of a Clarification Note (see Table 3.1), NatureScot responded (letter dated 04 February 2026) as follows:

"The clarification provided… addresses the issues we raised and we are content that nothing further is required noting the discrepancy presented within the original application".

5.4.8 The Offshore EIAR presents both the percentage of the total Management Unit (MU) population and the percentage of the UK portion of each MU predicted to be impacted by piling disturbance. These values are provided in Table 11.25 of **Volume 2, Chapter 11: Marine Mammals and Other Megafauna** of the Offshore EIAR, and are derived using dose-response relationships and species density estimates applied within the assessment.

5.4.9 By way of example, for harbour porpoise under the highest density scenario, the number of individuals predicted to be disturbed within the UK portion of the North Sea MU was 10,238, corresponding to approximately 6.41% of the UK portion of that MU. The percentages reported in the EIAR therefore already reflect the UK-portion population basis requested for clarification.

5.4.10 Species densities used in the cumulative assessment were derived using the approach described in the Offshore EIAR and further clarified through post-application correspondence with NatureScot (see Table 3.1).

5.4.11 Following further review and taking account of advice from NatureScot, the cumulative assessment has been updated to present the percentage of populations affected with reference to the UK portion of the relevant MU, where appropriate. The updated calculations and results are presented in **Appendix 4: Marine Mammal and Other Megafauna EIA CIA Updates** of this Addendum (noting, updates are limited to the inclusion of the UK portion of the relevant MU and no other updates to the CIA have been made).

5.4.12 The underlying methodology for deriving species densities remains as described in the Offshore EIAR, specifically:

- Densities from the project-alone assessment for the Proposed Development, with the maximum number of animals disturbed calculated in the alone assessment taken as indicative number of animals disturbed per day;
- Quantitative disturbance estimates (i.e., maximum number of animals predicted to be disturbed per day) from published EIAs for other projects where available at the time of consent application;
- SCANS survey block densities (SCANS-IV or SCANS-III, when SCANS-IV not available) where project-specific assessments were not available;
- The bottlenose dolphin assessment for the Coastal East Scotland MU, used densities based on Cheney *et al*. (2024) and SCANS-III; and
- Densities derived from Carter *et al.* (2022) where used to calculate the indicative number of seals disturbed per day.

5.4.13 These updates refine the presentation of cumulative impacts but do not materially alter the conclusions of the marine mammal assessment.

5.4.14 The correct value of 162 days was used in the impact assessment and modelling, and therefore this discrepancy does not affect the conclusions of the marine mammal assessment presented in the Offshore EIAR. These clarifications do not alter the conclusions of the marine mammal assessment presented in the Offshore EIAR.

5.4.15 Following post-application engagement, NatureScot advised that any significant residual impacts associated with suction anchors and piling could be addressed through the Piling Strategy and MMMP.

5.4.16 NatureScot also reiterated its advice regarding the use of the UK portion of Management Units in cumulative assessments. This has been addressed through the updated cumulative assessment presented in **Appendix 4: Marine Mammal and Other Megafauna EIA CIA Updates**.

5.4.17 These clarifications and updates do not alter the overall conclusions of the marine mammal assessment presented in the Offshore EIAR.

5.5 Turbot Bank ncMPA

Clarifications

5.5.1 MD-LOT sought clarification of the following in relation to assessment of the Turbot Bank ncMPA:

"The extent of Suspended Sediment Concentration that will be deposited within the Turbot Bank ncMPA, as there are contradictions between, and within, EIA chapters."

5.5.2 This clarification reflects comments raised by NatureScot, drawing on advice provided by the Joint Nature Conservation Committee (JNCC), in relation to potential sediment plume deposition on habitat supporting the sandeel feature of Turbot Bank ncMPA.

5.5.3 Potential impacts associated with temporary increases in SSC and associated seabed deposition during OTC installation were assessed within **Volume 2, Chapter 7: Marine and Coastal Processes**, **Volume 2, Chapter 10: Fish and Shellfish Ecology** and **Volume 3, Appendix 10.2: Marine Protected Area Assessment** of the Offshore EIAR. **Volume 2, Chapter 7: Marine and Coastal Processes** of the Offshore EIAR presents the predicted generation and dispersion of SSC arising from offshore construction activities, including OTC installation. While this chapter does not present a site-specific SSC assessment for the Turbot Bank ncMPA, the predicted increases in SSC and associated seabed deposition reported therein were used to inform the assessment of potential indirect likely significant effects on sandeel-supporting habitat within Turbot Bank ncMPA presented in **Volume 3, Appendix 10.2: Marine Protected Area Assessment** of the Offshore EIAR, with reference to receptor sensitivities identified in **Volume 2, Chapter 10: Fish and Shellfish Ecology** of the Offshore EIAR.

5.5.4 Modelling outputs and receptor sensitivities were subsequently applied within **Volume 3, Appendix 10.2: Marine Protected Area Assessment** of the Offshore EIAR to assess whether indirect increases in SSC and associated sediment deposition arising from OTC installation could affect the sandeel feature of the Turbot Bank ncMPA. The assessment concluded that the potential for the sandeel feature to be significantly impacted by the presence of the Proposed Development during the construction and decommissioning phase is unlikely and, therefore, the Proposed Development will not hinder the achievement of the site Conservation Objectives (Section 5 and Table 5.12: Conclusion of Assessment Against Conservation Objectives with Regard to Increased SSC and Deposition During Construction and Decommissioning in **Volume 3, Appendix 10.2: Marine Protected Area Assessment** of the Offshore EIAR).

5.5.5 The OTC Corridor is located adjacent to, but does not cross, the boundary of the Turbot Bank ncMPA. As such, any increase in SSC within the ncMPA would arise only through indirect dispersion of suspended sediments generated during installation activities. As described in **Volume 2, Chapter 7: Marine and Coastal Processes** of the Offshore EIAR, increases in SSC associated with offshore construction activities are predicted to be localised and temporary in nature, with suspended material settling rapidly from the water column and sediment deposition decreasing with distance from the installation source (see Table 7.11: Increase in Suspended Sediment Concentrations and Consequential Changes to Seabed Levels in **Volume 2, Chapter 7: Marine and Coastal Processes** of the Offshore EIAR).

5.5.6 For OTC installation (jetting activities), **Volume 2, Chapter 7: Marine and Coastal Processes** of the Offshore EIAR predicts that maximum increases in SSC within the OTC Corridor would be less than 40 mg/l (excluding landfall), with increases greater than 20 mg/l occurring for approximately 1% of the model simulation period. SSC increases greater than 0.5 mg/l are predicted to occur over approximately 20% of the model simulation period and typically do not extend beyond 8 km to the north and 20 km to the south of the OTC Corridor.

5.5.7 At distances from installation activities relevant to the Turbot Bank ncMPA, SSC increases are predicted to be low (generally less than 5 mg/l), comparable to natural background variation.

5.5.8 Associated sediment deposition is typically predicted between approximately 4 and 6 mm within the OTC Corridor with maximum increases of up to 10 mm occurring in discrete locations along the route. Outside of the OTC Corridor, deposited sediment thicknesses of up to approximately 2 mm may occur up to 10 km away from installation activities.

5.5.9 On this basis, **Volume 3, Appendix 10.2: Marine Protected Area Assessment** of the Offshore EIAR considered the potential for distal sediment plume dispersion to result in small-scale seabed deposition within the Turbot Bank ncMPA under worst-case conditions. The assessment concluded that any such deposition would be:

- Spatially limited;
- Temporary in duration; and
- Subject to rapid reworking through natural tidal and wave-driven sediment transport processes.

5.5.10 As set out in **Volume 3, Appendix 10.2: Marine Protected Area Assessment** of the Offshore EIAR (Section 5; Table 5.12), the magnitude and spatial extent of any sediment deposition predicted to occur within the Turbot Bank ncMPA is not of a scale likely to result in measurable changes to sediment composition or habitat suitability for sandeel. SSC increases predicted to extend beyond the OTC Corridor are generally less than 5 mg/l, with associated sediment deposition at millimetre-scale thicknesses. Accordingly, indirect deposition within the Turbot Bank ncMPA would be limited in spatial extent and temporary in duration, and the Proposed Development was not predicted to hinder the achievement of the site Conservation Objectives.

5.5.11 This conclusion is consistent with the advice provided by JNCC, who noted that any impacts on sandeel would be small-scale and short-term in nature and agreed with the Applicant's conclusion that the Proposed Development would not hinder the achievement of the Conservation Objectives of Turbot Bank ncMPA. Similarly, NatureScot acknowledged that the Proposed Development is not capable of materially affecting the protected features of the relevant ncMPAs.

5.5.12 The clarification provided herein demonstrates how the SSC dispersion modelling presented in **Volume 2, Chapter 7: Marine and Coastal Processes** of the Offshore EIAR was used to inform the assessment of indirect effects on the sandeel feature of the Turbot Bank ncMPA presented in **Volume 3, Appendix 10.2: Marine Protected Area Assessment** of the Offshore EIAR, with reference to receptor sensitivities identified in **Volume 2, Chapter 10: Fish and Shellfish Ecology** of the Offshore EIAR. This clarification does not introduce new modelling or assessment and does not alter the conclusions of **Volume 3, Appendix 10.2: Marine Protected Area Assessment** of the Offshore EIAR that the Proposed Development will not hinder the achievement of the Conservation Objectives of the Turbot Bank ncMPA.

5.6 Socio-cultural and Socio-economics

Clarifications

5.6.1 MD-LOT, based on advice from the Marine Analytical Unit (MAU), requested clarification on aspects of the socio-cultural and socio-economic assessments presented within the Offshore EIAR (**Volume 2, Chapter 17: Socioeconomics, Tourism and Recreation**). These included:

- Clarification on why a socio-cultural impact assessment was not undertaken despite advice in the Scoping Opinion that this topic should be scoped in, or alternatively provision of such an assessment; and
- Provision of a shortlist of potential ports (approximately four to five) for the operation and maintenance phase to enable consideration of cumulative social impacts in terms of potential benefits or costs of the Project.

5.6.2 The Applicant recognised the Scoping Opinion requirement for a socio-cultural impact assessment in the Offshore EIAR and provided justification for the approach taken within **Volume 2, Chapter 17: Socioeconomics, Tourism and Recreation** of the Offshore EIAR. Social effects such as impacts on demographics, housing demand and local services were considered within the socio-economic assessment. Other potential socio-cultural impacts, such as changes to community character, image, or quality of life, are typically assessed in offshore wind EIAs through primary stakeholder research once key infrastructure locations (e.g., construction and operation and maintenance ports) are defined. Desk-based extrapolation of socio-cultural effects from local authority-level data would not provide a reliable proxy for location-specific community impacts and may result in the identification of effects in locations that are not ultimately associated with Project activities. On this basis, undertaking a socio-cultural impact assessment at the application stage was considered disproportionate and not aligned with established industry practice.

5.6.3 At the time of writing the Offshore EIAR, the locations of key infrastructure, including operation and maintenance ports, had not been defined. It was therefore considered that undertaking meaningful primary research at that stage would risk stakeholder fatigue and would not provide robust or representative results. Details of stakeholder engagement, including with community groups, is described in detail in **Volume 4, Appendix 1: Pre-Application Consultation Report** of the Offshore EIAR, which did not identify any likely significant socio-cultural effects. The Applicant therefore committed to supporting sector wide primary research on socio-cultural impacts of the development of offshore wind that may be commissioned by sector bodies, such as the Scottish Offshore Wind Energy Council (SOWEC). As a result, the socio-cultural effects which would require primary social research to undertake an assessment were not considered in **Volume 2, Chapter 17: Socioeconomics, Tourism and Recreation** of the Offshore EIAR and have not been considered as part of this Addendum.

5.6.4 While other technical topic assessments within the Offshore EIAR (for example Climate) can apply indicative assumptions regarding port locations for the purposes of estimating logistics-related effects at a regional scale, such assumption do not provide a reliable basis for identifying the specific communities that may experience socio-cultural impacts. Socio-cultural effects are inherently location-specific and, therefore, cannot be robustly assessed on the basis of a worst-case assumption. At this stage of project development, the location of the operation and maintenance base has not been determined and it is not currently possible to meaningfully identify the communities which may be affected by such impacts. The selection of an O&M port will depend on a range of factors that will be determined at later stages of project development, including technical requirements, vessel strategy, commercial arrangements, and availability of suitable infrastructure at the time of procurement.

5.6.5 The socio-economic assessment presented in the Offshore EIAR (**Volume 2, Chapter 17: Socioeconomics, Tourism and Recreation**) considered impacts at an appropriate geographic scale to reflect this uncertainty and to ensure that potential effects were not underestimated. This approach is considered proportionate given the current level of design definition.

5.6.6 Once project parameters are further developed and potential port locations can be identified with greater certainty, the Applicant will consider socio-economic and socio-cultural effects associated with the selected port location as part of the ongoing project development and stakeholder engagement process. However, given the current level of design definition and the absence of confirmed infrastructure locations, it is considered that further assessment in relation to socio-economic and socio-cultural effects is not necessary at this stage to enable MD-LOT to reach a reasoned conclusion on the likely significant effects of the Proposed Development on the environment in accordance with the EIA Regulations.

6 Summary and Conclusions

6.1.1 This Addendum, and the supporting appendices, supplement and update elements of the Offshore EIAR and HRA documentation submitted for the Proposed Development to MD-LOT in August 2025.

6.1.2 This Addendum has been produced in response to MD-LOT's formal Request for Additional Information, received on 15 December 2025. The request was made to support MD-LOT in reaching a reasoned conclusion on the likely significance of environmental effects from the Proposed Development and sought several points of clarification raised during stakeholder consultation.

6.1.3 The Request for Additional Information related to the following receptors and topics:

- Offshore ornithology, including regional population estimates, SPA apportioning and PVA; and
- Blue carbon, specifically the provision of a blue carbon assessment.

6.1.4 MD-LOT also requested clarification relating to the following receptors and topics:

- Offshore ornithology displacement rates, assessment outputs (minor discrepancies) and consideration of a 'without Berwick Bank' scenario as part of in-combination assessments;
- Marine mammals clarifications regarding approaches to assessment;
- Marine and coastal processes and benthic ecology in relation to increased SSCs and sediment deposition within the Turbot Bank ncMPA; and
- Socio-economic and socio-cultural considerations, including advice provided by the MAU.

6.1.5 In response, the Applicant has undertaken additional assessment and provided clarification where required. This includes updated ornithological assessment and PVA, which have been undertaken to support the EIA and HRA, and provide the information necessary to inform the Appropriate Assessment. A Blue Carbon Assessment has also been completed, and clarification has been provided on specific aspects of the marine mammal, physical processes, and socio-economic assessments. The additional information and clarifications provided fully address the points raised in the MD-LOT request and supporting consultee advice.

6.1.6 The updated assessments and clarifications confirm that the conclusions of the Offshore EIAR remain unchanged. The additional analyses and information provided do not materially alter the predicted environmental effects of the Proposed Development, and likely effects assessed remain as **Not significant in EIA terms**.

6.1.7 The Applicant deems that the information presented within this Addendum and its supporting appendices provides sufficient detail to fully address the matters raised by MD-LOT, based on representations submitted by NatureScot and MAU, and to support the ongoing determination of the consent application.

7 References

BTO. (2026) 'Seabird Monitoring Programme'. Available at: https://app.bto.org/seabirds/public/data.jsp (Accessed 23/02/2026).

Carter, M.I.D., Boehme, L., Cronin, M.A., Duck, C.D., Grecian, W.J., Hastie, G.D., Jessopp, M., Matthiopoulos, J., McConnell, B.J., Miller, D.L., Morris, C.D., Moss, S.E.W., Thompson, D., Thompson, P.M. and Russell, D.J.F. (2022) 'Sympatric seals, satellite tracking and protected areas: habitat-based distribution estimates for conservation and management'. Frontiers in Marine Science, 9: 875-869.

Cheney, B.J., Arso Civil, M., Hammond, P.S. and Thompson, P.M. (2024) 'Site Condition Monitoring of bottlenose dolphins within the Moray Firth Special Area of Conservation 2017-2022'. NatureScot Research Report 1360.

Department for Environment, Food and Rural Affairs (Defra) (2025) 'Consultation outcome. Summary of responses and government response. Updated 3 December 2025'. Available at: https://www.gov.uk/government/consultations/offshore-wind-environmental-compensation-reforms/outcome/summary-of-responses-and-government-response (Accessed 23/02/2026).

Horswill, C. and Robinson, R.A. (2015) 'Review of Seabird Demographic Rates and Density Dependence'. JNCC Report No. 552, JNCC, Peterborough, ISSN 0963-8091.

Koschinski, S. and Lüdemann, K. (2020) 'Noise mitigation for the construction of increasingly large offshore wind turbines'. Technical Options for Complying with Noise Limits, 40.

Scottish Government (2020a) 'Sectoral Marine Plan for Offshore Wind Energy'. Available at: https://www.gov.scot/publications/sectoral-marine-plan-offshore-wind-energy (Accessed 09/02/2026).

Scottish Government (2020b) 'Offshore Wind Policy Statement'. Available at: https://www.gov.scot/publications/offshore-wind-policy-statement (Accessed 09/02/2026).

Scottish Government (2025b) 'Draft Updated Sectoral Marine Plan for Offshore Wind Energy'. Available at: https://www.gov.scot/publications/draft-updated-sectoral-marine-plan-offshore-wind-energy-2025/documents/ (Accessed 23/02/2026).

Scottish Government (2025b) 'Draft Updated Sectoral Marine Plan for Offshore Wind Energy (2025). Consultation Analysis Report (May 2025 to August 2025)'. Available at: https://www.gov.scot/publications/draft-updated-sectoral-marine-plan-offshore-wind-energy-2025-consultation-analysis-report/documents/ (Accessed 23/02/2026).

Scottish Government (2025c) 'Scottish Marine Recovery Fund: interim guidance'. Available at: https://www.gov.scot/publications/scottish-marine-recovery-fund-guidance (Accessed 09/02/2026).

Scottish Government (2025d) 'Scottish Marine Recovery Fund (2025). Consultation Analysis Report (August 2025 to September 2025). Report commissioned by Scottish Government'. Available at: https://www.gov.scot/publications/scottish-marine-recovery-fund-consultation-analysis-report/documents/ (Accessed 23/02/2026).

Scottish Government (2025e) 'Strategic Compensation Policy for Offshore Wind (2025). Consultation Analysis Report (22 July 2025 to 1 September 2025)'. Available at: https://www.gov.scot/publications/offshore-wind-strategic-compensation-policy-consultation-analysis-report/documents/ (Accessed 23/02/2026).

Scottish Government (2025f) 'National Marine Plan 2: Planning Position Statement Consultation Analysis Report'. Available at: https://www.gov.scot/publications/national-marine-plan-2-planning-position-statement-consultation-analysis-report/documents/ (Accessed 23/02/2026).

Scottish Government (2026a) 'Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition – Consultation Analysis'. Available at: https://www.gov.scot/publications/consultation-analysis-update-2020-offshore-wind-policy-statement-scotlands-offshore-wind-ambition/documents/ (Accessed 23/02/2026).

Scottish Government (2026b) 'Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition'. Available at: https://www.gov.scot/publications/update-2020-offshore-wind-policy-statement-scotlands-offshore-wind-ambition-2/documents/ (Accessed 23/02/2026).

Weilgart, L. (2023) 'Best Available Technology (BAT) and Best Environmental Practice (BEP) for Mitigating Three Noise Sources: Shipping, Seismic Airgun Surveys, and Pile Driving'. 53 Pages. CMS Technical Series No. 46.

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