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Date: 27/02/2026

Dear Ben,

Electricity Act 1989 (as amended)

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

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

Marine and Coastal Access Act 2009

Marine (Scotland) Act 2010

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

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

Cerulean Winds Aspen Project Limited, Submission of Additional Environmental Information in relation to the application for consent for the construction and operation of an offshore generating station, Aspen Offshore Wind Farm.

An application was submitted in August 2025 by Cerulean Winds Aspen Project Limited ('the Applicant') under Section 36 of the Electricity Act 1989 seeking consent to construct and operate an offshore generation station in the North Sea, 84km from the Scottish coast at Peterhead. The Development area covers approximately 333 km². The generating station would have an installed capacity of approximately 1GW with up to 72 wind turbine generators with a maximum blade tip height of 310 m above lowest astronomical tide. Applications were also submitted under Part 4 of the Marine and Coastal Access Act 2009 and Part 4 of the Marine (Scotland) Act 2010, covering the proposed generation asset and offshore transmission infrastructure.

This submission has been prepared in response to a formal request for additional information from the Marine Directorate – Licensing Operations Team (MD-LOT), on behalf of Scottish Ministers, dated 15th of December 2025.

Additional Information Requested

The following table demonstrates where additional information requested has been submitted. The required information has been captured within an Environmental Impact Assessment Report and Habitats Regulations Appraisal Addendum, accompanied by supporting technical appendices.

Topic	Request for Additional Information	Considered in Addendum
Blue Carbon	<p>MD-LOT requires that the following must be submitted as Additional Information on the basis of the NatureScot representation:</p> <ul style="list-style-type: none"> • 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. <p>The Applicant is directed to the NatureScot representation for further details regarding blue carbon assessments.</p>	<p>A blue carbon assessment has been undertaken in response to MD-LOT's request, aligned with the advice provided in the Offshore Scoping Opinion and NatureScot's representation. This is provided in Appendix 1: Blue Carbon Assessment of the Addendum, with a summary provided in Section 5.2 of the Addendum.</p>
Ornithology	<p>MD-LOT requires that the following must be submitted as Additional Information on the basis of the NatureScot representation:</p> <p><u>Determination of guillemot regional populations for EIA</u></p> <p>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 (153.7km).</p> <p><u>Apportioning Impacts to Special Protection Areas ("SPA")</u></p> <p>The approach to apportioning impacts to SPAs for guillemot does not reflect advice provided to the Developer by NatureScot and will result 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</p>	<p>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.</p> <p>Additional information is provided in Appendix 2: Offshore Ornithology EIAR and RIAA Updates and Appendix 3: Offshore Ornithology PVA Technical Report of the Addendum, with a summary of</p>

Topic	Request for Additional Information	Considered in Addendum
	<p>in-combination impacts at Buchan Ness to Collieston Coast SPA, Fowlsheugh SPA and Troup, Pennan and Lion's Head SPA.</p> <p>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.</p> <p><u>PVA</u></p> <p>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:</p> <ul style="list-style-type: none"> • 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 <p>The Applicant is directed to the NatureScot representation for further details and instructions on resolving improving confidence in the assessments provided.</p>	<p>results provided in Section 5.3 of the Addendum.</p>

Clarifications

MD-LOT, in addition to the above Additional Information request, has sought clarification on the basis of consultee representations, as shown in the table below.

Consultee	Clarification	Considered within Addendum
NatureScot	Ornithology <ul style="list-style-type: none"> • Clarification that displacement rates presented in tables 2.4 & 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). 	Clarifications have been provided in relation to ornithological assessment in Section 5.3 of the Addendum.
	Marine Mammals <ul style="list-style-type: none"> • 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. 	Clarifications have 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 the 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 the Addendum.
	Turbot Bank Nature conservation Marine Protected Area (ncMPA) <ul style="list-style-type: none"> • Clarification of the extent of Suspended Sediment Concentration 	Clarification has been provided in relation to the extent of Suspended Sediment Concentration predicted to be

	<p>that will be deposited within the Turbot Bank ncMPA, as there are contradictions between, and within, EIA chapters</p>	<p>deposited within the Turbot Bank ncMPA. This is provided in Section 5.5 of the Addendum.</p>
<p>Marine Analytical Unit</p>	<p>Socio-cultural impacts</p> <ul style="list-style-type: none"> 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. <p>Socio-economic impacts</p> <ul style="list-style-type: none"> 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 to provide comment on the cumulative social impacts, in terms of benefits or costs, of the project. 	<p>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.</p> <p>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.</p> <p>Responses to socio-cultural and socio-economic clarifications are provided in Section 5.6 of the Addendum.</p>

Public Notices and Consultation

In accordance with the relevant EIA and consent regulations, the Applicant has arranged for notices relating to the submission of the AIR to be placed in the following newspapers;

- Edinburgh Gazette
- Buchan Observer
- Fishing News
- Press & Journal
- The Herald
- The Scotsman and;
- Lloyds List.

The adverts will advise the public how to participate in the consultation on the application, in accordance with The Marine Works (Environmental Impact Assessment) Regulations 2007, The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Electricity (Applications for Consent) Regulations 1990. Hard copies of the AIR submission will be made available for the public to view in the following locations:

Location	Address	Opening Hours
Stonehaven Library	Evan St, Stonehaven, AB39 2ET	Tuesday 09:00-18:00 Wednesday and Friday: 09:00-17:00 Saturday: 10:00-14:00
Peterhead Library	Leisure and Community Centre, Balmoor Terrace, Peterhead, AB42 1EP	Tuesday and Wednesday: 09:00-18:00 Friday: 09:00 – 17:00 Saturday 10:00 – 14:00
Aberdeen Central Library	Rosemount Viaduct, Aberdeen, AB25 1GW	Monday and Wednesday: 09:00 – 20:00 Tuesday, Thursday, Friday and Saturday: 09:00 – 17:00
Fraserburgh Library	King Edward St, Fraserburgh, AB13 9PN	Tuesday and Thursday: 09:00-18:00 Friday: 09:00-17:00 Saturday: 10:00 – 14:00



Once the application has been accepted by MD-LOT, digital copies of the application documents will also be published online at [Aspen Offshore Wind Farm | marine.gov.scot](#) and <https://aspen.ceruleanwinds.com/>

Hard copies can also be made available on request. These will be subject to a charge of £250 and £10 on CD/USB stick (including post and packaging). Requests for hard copies of the application documents can be made at: community@ceruleanwinds.com.

We look forward to hearing from you in relation to the formal acceptance of this submission of Additional Information and Clarifications.

Yours Sincerely,

[Redacted]

Colin Maciver
Senior Director