Aberdeenshire Council

Aberdeenshire COUNCIL

Our Ref: ENQ/2025/1559
Your Ref:

Ask for: Galina Fomina
Tel: 01467 469127
Email: Redacted

Scottish Government
Marine Licensing & Consenting Casework Officer
Licensing Operations Team
Marine Directorate
Marine Laboratory
Aberdeen
AB11 9DB

30 October 2025

Dear Sir/Madam

Marine Licence Consultation for Consent to Construct and Operate a Generating Station at Ossian Offshore Wind Farm

Thank you for the above consultation received on 20th of October 2025. Due to the distance noted between the coastline belonging to Aberdeenshire and the proposed development site, Aberdeenshire Council has no objections or comments on the additional information provided in regards to the proposed development at this time.

Yours faithfully

Redacted

Paul Macari
Head of Planning and Economy

British Telecom Radio Network Protection

From: radionetworkprotection@bt.com
To: MD Marine Renewables
Cc: Redacti Redacted radionetworkprotection@bt.com
Subject: RE: WID14064 - 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025
Date: 26 November 2025 15:54:02
Attachments: image004.png
image001.png

General

BT Group

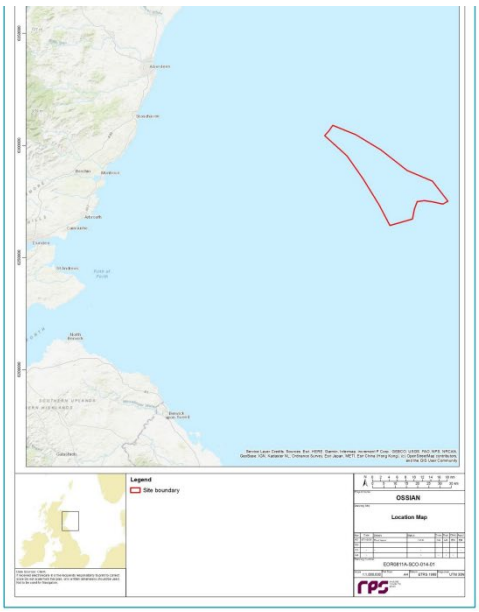
-
-

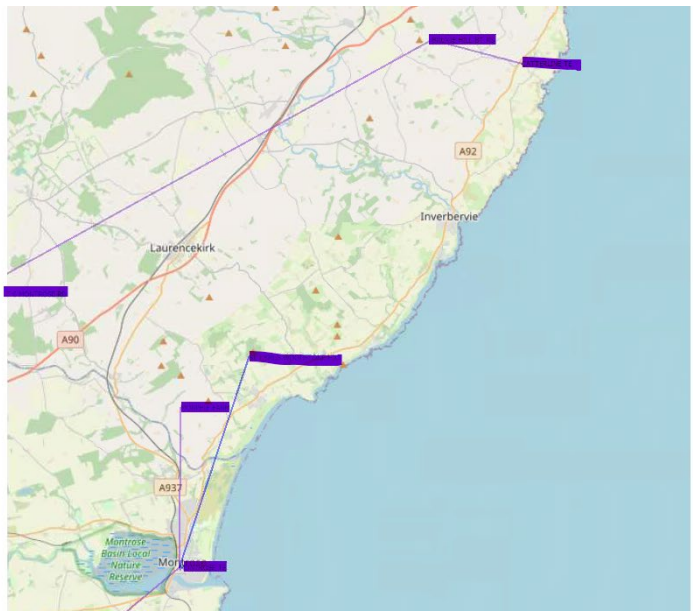
OUR REF; WID14064

Thank you for your email dated 16/10/2025

We have studied the 'Additional Informatio' provided with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that, as there appears to be no change to the planned location of the Offshore Windfarm, this project should not cause interference to BT's current and presently planned radio network.





BT requires 100m minimum clearance from any structure to the radio link path. It should be noted that this decision is for the date of its issue as the use of the spectrum is dynamic and can change on an ongoing basis. Therefore, please reconsult us if there are any changes during the planning process with heights and locations of any structures, and its finalisation, as we may have new links assigned by Ofcom over its duration.

Please note this refers to BT Radio Links only, you will need to contact other providers separately for information relating to other supplier links / equipment.

Please direct all queries to radionetworkprotection@bt.com

Kind regards

Laura Taylor
Networks Radio Planner
Radio & Satellite Platforms
E: radionetworkprotection@bt.com

BT Group

General

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 16 October 2025 12:08
To: MD.MarineRenewables@gov.scot
Cc Redacted ;Redacted
Subject: WID14064 - 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited ("the Applicant") submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

- Cover Letter
- Introduction
- Addendum to Chapter 7: Physical Processes

- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Department of Agriculture, Environment and Rural Affairs

From:	DAERA Marine Information Requests
To:	MD Marine Renewables
Subject:	RE: CM: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025
Date:	02 December 2025 13:40:47
Attachments:	image002.png image003.png

Hi
This is a nil return from NI Marine and Fisheries Division. Thanks
Eamonn

Eamonn Brady | Marine Plan Team | Department for Agriculture, Environment and Rural Affairs
Ground Floor | Clare House | 303 Airport Road West | Belfast | BT3 9ED
Contact: R| **Tel:** (028) 90 569262 | **DD:** Redacted

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 16 October 2025 12:08
To: MD.MarineRenewables@gov.scot
Cc: Redacted ; Redacted
Subject: CM: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited (“the Applicant”) submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

Cover Letter
- Introduction
- Addendum to Chapter 7: Physical Processes
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Dundee City Council

From: Redacted
To: MD Marine Renewables
Subject: FW: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025
Date: 03 December 2025 16:46:47
Attachments: image001.png

Good afternoon
No comments from Dundee City Council.
Kind Regards
Laura

Laura Stewart
Principal Planning Officer (Planning & Economic Development) at Dundee City Council

E Redacted
P Redacted

W www.dundeecity.gov.uk
A Dundee House, 50 North Lindsay Street, DUNDEE, DD1 1QE

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 03 December 2025 11:20
To: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Cc: Redacted <Redacted ; Redacted <Redacted >
Subject: RE: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/ Madam,

The consultation period for the proposal described below ended on 2 December 2025, however MD-LOT has not received a response from your organisation. As a statutory consultee, if you could please submit a response or confirmation of nil return that would be much appreciated. If no response is received by COP on Monday 8 December 2025 a nil return will be assumed.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted
The Scottish Government
Scottish Government
Riaghaltas na h-Alba

In the service of Scotland
Integrity Inclusivity Innovation Collaboration Kindness

From: MD Marine Renewables
Sent: 16 October 2025 12:08

To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Cc: Matt Bell <Redacted Emma Lees <Redacted
Subject: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989

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

The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009

The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited ("the Applicant") submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

- Cover Letter
- Introduction
- Addendum to Chapter 7: Physical Processes
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,

Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted
The Scottish Government

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Edinburgh Airport

From:	Safe Guarding
To:	MD Marine Renewables
Cc:	Safe Guarding
Subject:	00010861 / 00010862 - Ossian Offshore Wind Farm Limited
Date:	25 October 2025 10:40:47
Attachments:	image001.png

Good morning,

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

With best regards,
Claire

Claire Brown
Aerodrome Safeguarding & Compliance Officer

Edinburgh Airport
Where Scotland meets the world

Our values

t: Redacted m: Redacted
My working hours are Monday-Friday
www.edinburghairport.com

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

Fife Council

From:	Redacted
To:	MD Marine Renewables
Subject:	Fw: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation
Date:	12 December 2025 14:15:26
Attachments:	Outlook-0dow5f3o.png Outlook-3imunyc4.png

From: Carter Wilson Redacted
Sent: Friday, December 12, 2025 14:10
To: MD.MarineRenewables@gov.sco <MD.MarineRenewables@gov.sco>;
Redacted
Cc: Martin Mcgroarty Redacted
Subject: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation

FAO Iain MacDonald

ELECTRICITY ACT 1989
The Electricity works (Environmental Impact Assessment)(Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

I refer to your consultation letter dated 16.10.25 regarding the above matter and am grateful to you for affording Fife Council an extension of time to consider its response.

Having reviewed the information provided, I can confirm that Fife Council has no comments to make on the proposal.

Kind regards,

Carter

Carter Wilson

Graduate Planner

Major Business & Customer Service (Minerals)

Planning team

LISTEN| CONSIDER |RESPOND

For more information, please see our website www.fife.gov.uk/planning or follow us on Twitter @https://twitter.com/FifePlanning

Fife Council has been accredited a Bronze Carbon Literate Organisation (CLO) by The Carbon Literacy Project and is committed to delivering climate literacy within the organisation to address the climate emergency. Planning Services have achieved Gold Carbon Literate Organisation, further rising to the challenge of the climate emergency.

Forth Ports

From: Redacted
To: MD Marine Renewables; Redacted Redacted
Cc: Redacted
Subject: FW: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025
Date: 16 October 2025 14:01:55
Attachments: image001.png

Hi Iain

I can confirm we have no comments.

Thanks
Carol

Carol Potter | PA to the Chief Legal and Property Officer | Forth Ports Limited

Head Office | 1 Prince of Wales Dock | Edinburgh | EH6 7DX

T: Redacted | Mob: Redacted | https://forthports.co.uk

From: Carol Potter Redacted **On Behalf Of** Pamela Smyth
Sent: 16 October 2025 12:10
To: Carol Forman Redacted ; Carol Potter Redacted
Subject: FW: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 16 October 2025 12:08
To: MD.MarineRenewables@gov.scot
Cc: Redacted Redacted
Subject: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited ("the Applicant") submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

- Cover Letter
- Introduction

- Addendum to Chapter 7: Physical Processes
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Historic Environment Scotland

By email to:
MD.MarineRenewables@gov.scot

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

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

HMConsultations@hes.scot
0131-668-8716

Our case ID: 300064563
Your ref: 00010861 / 00010862
24 October 2025

Dear Marine Directorate

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Ossian Offshore Wind Farm
Additional Environmental Information

Thank you for your correspondence dated 18 August 2023 seeking our comments on the Additional Environmental Information (AEI) for the above proposal. This letter contains our comments for our historic environment interests. That is scheduled monuments and their settings, category A listed buildings and their settings, Inventory gardens and designed landscapes (GDL), Inventory battlefields, World Heritage Sites inventories and Historic Marine Protected Areas (HMPAs).

Historic Environment Scotland's position
Historic Environment Scotland (HES) does not object to the application. We have reviewed the Additional Environmental Information supplied along with the original EIA Report.

Our advice
We understand that the AEI relates to information on physical processes, offshore ornithology, assessment of Special Protection Areas and Ramsar sites and the Derogation case.

We note that no information or reassessment has been provided in relation to effects on the historic environment. We are satisfied that the AEI does not demonstrate any change to the assessed effects on the historic environment in the original EIA Report.

We are, therefore, content that the AEI does not demonstrate an effect that is significant for our interests. In light of this I can confirm that Historic Environment Scotland have no additional comments to add to our previous response dated 23 August 2024.

Please contact us if you have any questions about this letter. The officer managing this case is Victoria Clements who can be contacted by phone on Redacted or by email at Redacted

Yours sincerely

Historic Environment Scotland

Maritime and Coastguard Agency

From:	Redacted
To:	MD Marine Renewables
Cc:	RedactedRedacted Redacted Redacted
Subject:	RE: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025
Date:	16 October 2025 13:47:46
Attachments:	image002.png image003.png image004.png image005.png image006.png image007.png image008.png

Dear Iain,

Since the additional information is not in regard shipping and navigation we won't provide a response so please take this as a 'nil response' from us.

Kind regards,

Nick

Nick Salter
Offshore Renewables Lead
UK Technical Services
Navigation

Redacted
Redacted

Maritime and Coastguard Agency
Spring Place
105 Commercial Road,
Southampton, SO15 1EG

Safer Lives, Safer Ships, Cleaner Seas
www.gov.uk/mca

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 16 October 2025 12:08
To: MD.MarineRenewables@gov.scot
Cc: Redacted Redacted
Subject: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited ("the Applicant") submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

- Cover Letter
- Introduction
- Addendum to Chapter 7: Physical Processes
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Marine Directorate – Science, Evidence, Data and Digital

(Physical Processes Advice)

Scottish Government
Riaghaltas na h-Alba
gov.scot

E: MD-SEDD-RE_Advice@gov.scot

IAIN MACDONALD
MARINE LICENSING AND CONSENTING CASEWORK OFFICER
LICENSING OPERATIONS TEAM
MARINE DIRECTORATE
SCOTTISH GOVERNMENT

03/12/2025

RE: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Section 36 consent and Marine Licence Application – Additional Information

Advisors from the SEDD Marine Renewables & Ecology Team have reviewed the above request and provide the following advice.

The MD-SEDD oceanography advisor has reviewed the Ossian array EIA report addendum to chapter 7: physical processes additional environmental information (referred to as the additional information from here on).

The applicant has provided evidence that there is sustained seasonal temperature stratification at the OWF location, with the onset of stratification occurring in April/May, peaking in July/August and decaying in October. As requested, the applicant has quantified baseline sea surface to bottom temperature differences and approximate depth of the thermocline. The applicant presents large sea surface to bottom temperature differences in a climatological dataset of between 4 to 7 °C across the windfarm site (Figure 4.1) in August. The applicant has used two maximum design scenarios (MDS) to qualitatively assess the potential impact of the OWF structures on mixing and stratification. These two scenarios are for floating structures with either (a) larger drafts and lower widths (e.g. spar structures) and (b) lower drafts and larger widths (e.g. semi-sub structures).

The assessment of impact is based upon the limited published scientific literature/evidence which do not necessarily well represent the environmental conditions at this location (e.g. sustained seasonal stratification). There is therefore considerable uncertainty in the assessment. MD-SEDD do however agree with the overall classification of impact: medium magnitude of impact and low sensitivity of receptor (minor adverse significance). MD-SEDD have relied on their expert judgement here, based on the limited information presented in the additional information, but advise there is considerable uncertainty. In light of this uncertainty MD-SEDD recommend monitoring of the thermal stratification and chlorophyll concentration within the development, to confirm the minor significance of effect. MD-SEDD advise that such monitoring is best conducted in a coordinated and strategic manner, in order to reduce uncertainty going forward, and therefore welcome the applicants monitoring aspirations and commitment expressed in section 8.

Yours sincerely,

Renewables and Ecology Team
Marine Directorate – Science, Evidence, Data and Digital

Marine Directorate - Science, Evidence, Data and Digital (Socioeconomics advice)

From:	Redacted
To:	MD Marine Renewables; Redacted
Cc:	Redacted Redacted
Subject:	RE: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025
Date:	05 November 2025 14:57:31
Attachments:	image001.png

Hi Iain,

No additional information or amendments have been provided to the socio-economic section of the application. As such, this is to confirm that the Marine Analytical Unit are providing a nil response.

Best regards,

Chris

From: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Sent: 16 October 2025 12:08
To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Cc: Matt Bell <Redacted >; Emma Lees <Redacted
Subject: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited ("the Applicant") submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

- Cover Letter

Introduction
- Addendum to Chapter 7: Physical Processes
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government

Ministry of Defence

Defence Infrastructure Organisation

Defence Infrastructure Organisation

Wendy Talbot
Assistant Safeguarding Manager
Ministry of Defence
Safeguarding
Defence Infrastructure Organisation
St George's House
DMS Whittington
Lichfield, Staffordshire
WS14 9PY
United Kingdom

E-mail: DIO-Safeguarding-Wind@mod.gov.uk

Application Ref: 00010861 / 00010862

Our Reference: DIO10058405

Iain MacDonald
Licensing Operations Team
Marine Directorate
Scottish Government
Marine Laboratory
ABERDEEN
AB11 9DB

10 November 2025

Dear Iain

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

Thank you for consulting the Ministry of Defence (MOD) on the new documents and additional information provided by the Applicant with regard to the Ossian Offshore Wind Farm on 16 October 2025.

The MOD have reviewed the information provided and published on the Ossian Offshore Wind Farm Project Page of the marine.gov.scot website. We note that as there are no changes with regard to the proposed Ossian Wind Farm project, the MOD's position previously communicated by letter dated 3 September 2024 remains extant.

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

Yours sincerely

Redacted

Wendy Talbot
Assistant Safeguarding Manager

NatureScot

NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Iain MacDonald
Marine Directorate Licensing Operations Team
Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

02 December 2025

Our ref: CNS – REN – OSWF – E1
EAST – OSSIAN

Dear Iain,

OSSIAN OFFSHORE WIND FARM – ADDITIONAL INFORMATION

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER THE MARINE (SCOTLAND) ACT AND PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM

Thank you for consulting us on the Additional Information submitted for the proposed Ossian Offshore Wind Farm. This supplements the supporting information submitted as part of the original Application, submitted on 28 June 2024. We submitted our consultation advice to Marine Directorate on 20 September 2024.

The proposed development is located approximately 80km southeast of Aberdeen and includes a Project Design Envelope (PDE) approach comprising up to 265 floating wind turbines and associated infrastructure, with an anticipated installation capacity of 3.6GW and a proposed 35-year lease period.

The Additional Information provided includes Addendums to the Environmental Impact Assessment (EIA) Report, Report to Inform an Appropriate Assessment (RIAA) and Derogation Case.

We have reviewed the Additional Information, along with the relevant documents submitted with the original Application and provide advice below.

Background

As detailed within our advice provided on 20 September 2024, we advised that a partially revised ornithology assessment was required. In relation to the RIAA, we requested that updated screening and re-apportionment was undertaken, with subsequent consideration of any requirement for further Population Viability Analysis (PVA). These requested updates to the ornithology assessment also have implications for both the EIA Report (Chapter 11) and Derogation Case. Revisions and clarifications in relation to further additional points raised in our previous ornithology advice have also been provided by the Applicant, and we provide advice on these below.

Revisions and clarifications to the physical processes chapter (Chapter 7) have also been provided.

NatureScot advice

Following the request for Additional Information issued by Marine Directorate on 07 November 2024, we have engaged with the Applicant in relation to ornithology topics. This engagement has taken place through several post-application meetings and correspondence on a series of technical notes. The aim of which was to reach a consensus on the ornithology assessment methodology required to undertake the requested updated screening and re-apportionment, and information to be included in the submission of Additional Information.

We thank and welcome the effort undertaken by the Applicant and their ornithological consultants in engaging with us to address the issues raised in our previous advice on the original Application. We are content that the Additional Information provided has addressed the concerns raised in our previous advice. However, as highlighted below, we are aware of work currently being undertaken in relation to the ornithology in-combination assessment. As such, our final advice on in-combination impacts may change depending on the outcome of this work.

Offshore ornithology

During post-application engagement we provided project-specific advice to the Applicant regarding their proposed approach to re-assessment. The offshore location of the Ossian Array area relative to the recommended foraging range distance of some auk species caused some confusion and initial disagreement on the approach to apportioning and re-assessment. Various solutions were presented by the Applicant for consideration and discussion during post application engagement. The outcome of which has informed the Additional Information submission and is tailored to the Ossian project.

While the Additional Information has been presented following the approach agreed post-application, the Applicant also sets out a discussion regarding the validity of the approach taken which has been helpful to consider. Further comment and advice regarding the approach taken within this Additional Information is provided within our detailed advice in Appendix A. Key points from our advice are summarised below.

Offshore ornithology – EIA

Our detailed advice on impacts to ornithology receptors under EIA is presented in Section A.4 below.

Proposal alone assessment

We agree with the Applicant's conclusion within the Additional Information of **Not Significant** adverse impact for proposal alone impacts under EIA.

Cumulative assessment

In relation to the cumulative assessment, we conclude that the cumulative effects are **Significant** in EIA terms, including and excluding Berwick Bank Offshore Wind Farm for:

- Kittiwake through collision and displacement
- Guillemot through displacement
- Razorbill through displacement

In line with established EIA practice, we expect mitigation to be identified where a Significant adverse effect is identified.

Offshore ornithology – RIAA

Our detailed advice on impacts to ornithology receptors under HRA is presented in Section A.5 below.

In our advice on the original Application, we were unable to reach conclusions for in-combination impacts to several sites and species. The submission of Additional Information in relation to the RIAA has enabled us to now reach conclusions in relation to each of these sites and species. The conclusions provided in our advice below, now update those provided on a provisional basis, within our advice on the original Application for guillemot, herring gull, kittiwake and razorbill.

Proposal alone assessment of Adverse Effect on Site Integrity (AEoSI)

For sites and species assessed in the Additional Information, the Applicant concludes no AEoSI from project-alone impacts. We also conclude there to be no AEoSI from project-alone impacts.

In-combination assessment of AEoSI

Within the RIAA Addendum in-combination assessment, the Applicant has presented scenarios including and excluding Berwick Bank for some features at some SPAs. However, for specific SPA features that Berwick Bank is required to compensate a "Berwick Bank Compensated" scenario is presented. We are content to accept this approach; however, we are not aware of this being agreed with NatureScot or MD-LOT prior to submission of the Additional Information.

With regard to the in-combination assessment presented, we note that three developments (Ossian, Muir Mhòr and Caledonia) have submitted Additional Information at a similar time to each other. Assessments within the respective Additional Information submissions are based on the latest publicly available information, however, this information is now out of date given all three projects have submitted revised ornithology assessments within their Additional Information. As such, individual project numbers used within the current in-combination assessments may differ and additional / updated PVAs may need to be conducted for certain sites and species.

We note that work is currently being undertaken (led by Muir Mhòr, supported by Ossian and Caledonia) to develop a collective approach across these three developments to address this

issue, subject to agreement with Marine Directorate and NatureScot. Depending on the outcome of this work, our final advice on in-combination impacts may change.

Therefore, our advice below is based on the current assessment presented in the Additional Information submission.

For the qualifying species and sites listed below, we have concluded **AEoSI** in-combination with other offshore wind farm projects **where Berwick Bank is compensated for**:

- Kittiwake at Buchan Ness to Collieston Coast SPA
- Kittiwake at East Caithness Cliffs SPA
- Guillemot at Forth Islands SPA
- Kittiwake at Forth Islands SPA
- Razorbill at Forth Islands SPA
- Kittiwake at Fowlsheugh SPA
- Kittiwake at North Caithness Cliffs SPA
- Kittiwake at Troup, Pennan and Lion's Heads SPA

For the qualifying species and sites listed below, we are **Unable to conclude no AEoSI** in-combination with other offshore wind farm projects **where Berwick Bank is compensated for**:

- Guillemot at Fowlsheugh SPA
- Razorbill at Fowlsheugh SPA
- Guillemot at St Abbs Head to Fast Castle SPA
- Kittiwake at St Abbs Head to Fast Castle SPA

For the qualifying species and sites listed below, we are **Unable to conclude no AEoSI** in-combination with other offshore wind farm projects **including and excluding Berwick Bank**:

- Guillemot at Buchan Ness to Collieston Coast SPA
- Guillemot at Troup, Pennan and Lion's Heads SPA

Based on our assessment and conclusions presented above, and highlighting our advice in relation to puffin and gannet within our previous advice (issued 20 September 2024), we advise that Marine Directorate will be required to undertake an Appropriate Assessment.

Without prejudging the outcome of this Application and any subsequent Appropriate Assessment, we anticipate that compensation measures will need to be secured for kittiwake, guillemot, razorbill, puffin and gannet (noting that we refer to our advice issued 20 September 2024 for the latter two species, which have not been re-assessed within this Additional Information). We consider that such compensation measures could also be sufficient to address impacts predicted under EIA for the relevant species.

Ornithology derogation

As part of the Additional Information submission, the Applicant has included an Addendum to the previously submitted Derogation Case (provided on a without prejudice basis alongside the original Application).

The Addendum comprises two proposed compensation measures, to be progressed jointly and collaboratively with the Salamander Wind Project Company:

- To fund the continuation of the Scottish Invasive Species Initiative (SISI) Mink Control Project (MCP) once existing funding ends to ensure the continued existence of the MCP, and to intensify control within areas already covered by the MCP (Objective A). Coverage of the SISI MCP to areas not currently covered at present will be undertaken as part of an adaptive management strategy (Objective B) if required.
- To reduce bycatch of gannets in Portuguese waters in partnership with the Portuguese Society for the Study of Birds (SPEA).

We provide detailed advice within Appendix B, acknowledging that the Appropriate Assessment has yet to be finalised and as such the SPAs and qualifying species for which compensation may be required remains unconfirmed. Our advice builds upon our advice submitted in response to the Application (20 September 2024), which is still relevant.

Overall, we acknowledge that the Applicant has tried to address our previous concerns, noting that we collectively acknowledge that some uncertainties remain. In our view, key uncertainties are around mink accessibility at the SPAs identified in Objective A and mink density values. The Applicant has set out how proposed work will help reduce some of these uncertainties, but the results will not be available in the immediate future.

Despite these uncertainties, we can advise from an ecological feasibility perspective, that the proposed measures are likely to compensate for the impacts predicted, although further refinement will be required prior to the submission of the CIMP.

There is a need for ongoing, continuing dialogue with all parties, and we request that if this proposal is consented, the final CIMP should be agreed prior to operation of the wind farm.

Physical processes

We note that the Physical Processes Additional Information Addendum to Chapter 7 was triggered by advice from MD-SEDD rather than NatureScot. However, we have reviewed the document provided and notice there are a small number of discrepancies in Table 2.1. Two of the row entries attributed to NatureScot in the *Consultee and Type of Consultation* column, are incorrect. These were instead made by MD-SEDD, as is correctly outlined in the text in the corresponding *Stakeholder Representation* column. In reviewing the rest of the document, we are content that those points raised by NatureScot in our original response (letter dated 20 September 2024) have been addressed, for which we thank the Applicant. We defer to the expertise of MD-SEDD for advice on the implication of seasonal stratification in terms of its EIA significance and any knock-on effects to primary productivity and trophic levels.

In relation to monitoring, we are mindful that there are a number of research programmes underway that consider the impact of offshore wind developments on the physical environment including, but not limited to:

- ScotMER project "Development of marine physical process modelling guidelines for offshore wind farm environmental impact assessments", currently in progress.

- Scottish Government report “Scoping an Offshore Wind Sustained Observation Programme” (OW-SOP)[1]
- ECOWind "Physics-to-Ecosystem Level Assessment of Impacts of Offshore Windfarms" (PELAgIO)[2]
- Enabling Sustainable Wind Energy Expansion in Seasonally Stratified Seas (eSWEETS3)[3]

We welcome the commitment outlined in Section 8 and Paragraph 78 and recommend that further consideration is needed to establish the best mechanism through which Ossian, if consented, could contribute to the evidence base around seasonal stratification and in doing so validate EIA predictions.

Further Information and advice

We hope this advice is helpful. Please contact Clare McCarty (Redacted) or Kim McEwen (Redacted) in the first instance for any further advice, copying in our marine energy mailbox – marineenergy@nature.scot.

Yours sincerely,

Erica Knott

Head of Marine Energy – Sustainable Coasts and Seas.

[1] https://www.gov.scot/publications/scoping-offshore-wind-sustained-observation-programme-ow-sop/
[2] https://ecowind.uk/projects/pelagio/
[3] https://pcwww.liv.ac.uk/~jons/research.htm

Contents

NATURESCOT ADVICE ON OSSIAN OFFSHORE WIND FARM – ADDITIONAL INFORMATION

Appendix A – Offshore Ornithology

In relation to offshore ornithology the Applicant has included addendums to the EIA Report, RIAA and several supporting appendices within the Additional Environmental Information submission, comprising:

- Addendum to Chapter 11 - Offshore Ornithology (*referred to as the EIA addendum within our advice*)
- Addendum to Appendix 11.1 - Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3 - Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5 - Offshore Ornithology EIA PVA Report
- Addendum to Part 3 - Assessment of Special Protection Areas and Ramsar Sites (*referred to as the RIAA addendum within our advice*)
- Addendum to Appendix 3A - SPA Apportioning Technical Report
- Addendum to Appendix 3B - SPA PVA Technical Report

An addendum to the Derogation Case is also provided, our advice regarding the Derogation Case is included within Appendix B.

A.1 EIA summary

A.1.1 Proposal alone assessment

We agree with the Applicant's conclusion within the Additional Information of **Not Significant** adverse impact for proposal alone impacts under EIA.

A.1.2 Cumulative assessment

In relation to the cumulative assessment, we conclude that the cumulative effects are **Significant** in EIA terms, including and excluding Berwick Bank Offshore Wind Farm for:

- Kittiwake through collision and displacement
- Guillemot through displacement
- Razorbill through displacement

In line with established EIA practice, we expect mitigation to be identified where a Significant adverse effect is identified.

We consider any likely compensation measures for kittiwake, guillemot, razorbill, puffin and gannet (noting that we refer to our advice issued 20 September 2024 for the latter two species, which have not been re-assessed within this Additional Information) would also be sufficient to address impacts predicted under EIA for the relevant species.

A.2 RIAA summary

A.2.1 Proposal alone assessment of AEoSI - summary

Within our advice on the original Application, we were able to provisionally agree with the Applicant's conclusion of no AEoSI for proposal alone impacts for all seabird species considered in the RIAA.

For species and sites re-assessed within the Additional Information, the Applicant concludes no AEoSI from project-alone impacts. We also conclude there to be no AEoSI from project-alone impacts.

Table 1. Summary of project-alone conclusions of AEoSI for species and SPAs assessed in the Additional Information RIAA Addendum.

Species	**SPA**	**Conclusion of AEoSI – project alone**
Kittiwake	Buchan Ness to Collieston Coast	No AEoSI
	Calf of Eday	No AEoSI
	Copinsay	No AEoSI
	East Caithness Cliffs	No AEoSI
	Fair Isle	No AEoSI
	Forth Islands	No AEoSI
	Fowlsheugh	No AEoSI
	Hoy	No AEoSI
	Marwick Head	No AEoSI
	North Caithness Cliffs	No AEoSI
	Rousay	No AEoSI
	St Abbs Head to Fast Castle	No AEoSI
	Troup, Pennan & Lion's Heads	No AEoSI
Guillemot	Buchan Ness to Collieston Coast	No AEoSI
	Forth Islands	No AEoSI
	Fowlsheugh	No AEoSI
	St Abbs Head to Fast Castle	No AEoSI
	Troup, Pennan & Lion's Heads	No AEoSI
Razorbill	Forth Islands	No AEoSI
	Fowlsheugh	No AEoSI
	St Abbs head to Fast Castle	No AEoSI
	Troup, Pennan & Lion's Heads	No AEoSI

A.2.2 In-combination assessment of AEoSI - summary

Our detailed conclusions for individual sites and species are presented in Section A.5.3.1 below.

Within our advice on the original Application, we were unable to reach conclusions for in-combination impacts to several sites and species and requested a partial revised assessment in order to advise on:

- Guillemot and herring gull at Buchan Ness to Collieston Coast SPA,
- Razorbill at East Caithness Cliffs SPA,
- Guillemot and razorbill at Forth Islands SPA,
- Guillemot and herring gull at Fowlsheugh SPA,
- Razorbill at North Caithness Cliffs SPA,
- Guillemot and razorbill at St Abb's Head to Fast Castle SPA,
- Razorbill and guillemot at Troup, Pennan and Lion's Heads SPA.

Following the assessment provided within the Additional Information we provide conclusions in relation to the above sites and species. Detailed advice is set out in Section A.5.3, with summary tables provided below (see Table 2 and Table 3).

As noted above, we were previously unable to provide conclusions for razorbill at East Caithness Cliffs SPA and North Caithness Cliffs SPA. This was due to uncertainty in how screening and apportionment had been undertaken. In line with the screening and apportioning approach undertaken for the Additional Information submission, we are content that both sites can be screened out on the basis of the extended foraging range used.

Our previous advice provided conclusions on a provisional basis for kittiwake at several sites. As advised, the Applicant has undertaken updated screening and re-apportionment for kittiwake within the Additional Information. As such, our updated conclusions for kittiwake are included below.

We also provided conclusions on a provisional basis for puffin and gannet. As set out in Table 5.1 of the RIAA Addendum, a revised assessment was not required for puffin or gannet and therefore the assessment remains unchanged from that presented in the original Application. As such, our conclusions in relation to puffin and gannet remain as concluded within our previous advice (20 September 2024), albeit no longer on a provisional basis.

Within the RIAA Addendum in-combination assessment, the Applicant has presented scenarios including and excluding Berwick Bank for some features at some SPAs. However, for specific SPA features that Berwick Bank is required to compensate a "Berwick Bank Compensated" scenario is presented in light of the consent awarded to the Berwick Bank project in July 2025. We are content to accept this approach; however, we are not aware of this being agreed with NatureScot or MD-LOT prior to submission of the Additional Information.

With regard to the in-combination assessment presented, we note that three developments (Ossian, Muir Mhòr and Caledonia) have submitted Additional Information at a similar time to each other. Assessments within the respective Additional Information submissions are based on the latest publicly available information, however, this information is now out of date given all three projects have submitted revised ornithology assessments within their Additional Information. As such, individual project numbers used within the current in-combination assessments may differ and additional / updated PVAs may need to be conducted for certain sites and species.

We note that work is currently being undertaken (led by Muir Mhòr, supported by Ossian and Caledonia) to develop a collective approach across these three developments to this issue, subject to agreement with Marine Directorate and NatureScot. Depending on the outcome of this work, our final advice on in-combination impacts may change.

Therefore, our advice below is based on the current assessment presented in the Additional Information submission.

Table 2 summarises the detailed PVA outputs presented by the Applicant together with our conclusion for individual sites and species, as detailed in Section A.5.3.1.

Table 2. Summary of RIAA Addendum in-combination assessment where PVA has been undertaken.

SPA	Species	CPS* (Berwick Bank compensated)	CPS* (with Berwick Bank)	CPS* (without Berwick Bank)	NatureScot conclusion of AEoSI in-combination
Buchan Ness to Collieston Coast	Kittiwake	0.882/0.868			AEoSI
	Guillemot		0.967/0.864	0.972/0.883	Unable to conclude no AEoSI
East Caithness Cliffs	Kittiwake	0.790/0.712			AEoSI
Forth Islands	Kittiwake	0.857/0.794			AEoSI
	Guillemot	0.931/0.720			AEoSI
	Razorbill	0.928/0.674			AEoSI
Fowlsheugh	Kittiwake	0.866/0.815			AEoSI
	Guillemot	0.953/0.800			Unable to conclude no AEoSI
	Razorbill	0.963/0.826			Unable to conclude no AEoSI
North Caithness Cliffs	Kittiwake	0.83/0.789			AEoSI
St Abbs Head to Fast Castle	Kittiwake	0.910/0.867			Unable to conclude no AEoSI
	Guillemot	0.965/0.854			Unable to conclude no AEoSI
	Razorbill	0.997/0.908			No AEoSI
Troup, Pennan and Lion's Heads	Kittiwake	0.876/0.832			AEoSI
	Guillemot		0.966/0.866	0.969/0.878	Unable to conclude no AEoSI
	Razorbill	0.979/0.914			No AEoSI

*CPS values - low displacement mortality rate value followed by high displacement mortality rate value

For some SPAs and species assessed within the RIAA Addendum the percentage point change in adult survival did not meet the 0.02 threshold or the mortality from the project was less than 0.2 birds per annum and, therefore, PVA was not undertaken. Our advice has since been updated, such that we no longer accept use of the 0.2birds/annum threshold. However, this approach is in-line with our guidance provided in relation to the Application at that time (see Table 2.1 of the RIAA Addendum). For the sites and species summarised below in Table 3, we conclude no AEoSI.

Table 3. Species and SPAs where PVA has not been undertaken as % point change in adult survival did not meet the threshold for PVA.

Species	SPA	NatureScot conclusion of AEoSI in-combination
Kittiwake	Calf of Eday	No AEoSI
	Copinsay	No AEoSI
	Fair Isle	No AEoSI
	Hoy	No AEoSI
	Marwick Head	No AEoSI

	Rousay	No AEoSI
Herring Gull	Buchan Ness to Collieston Coast	No AEoSI
	Fowlsheugh	No AEoSI

A.3 Assessment approach

A.3.1 Approach to partially revised assessment

In our advice on the original Application (as issued 20 September 2024) we noted that the Applicant had mistakenly used the geometric centre element of the apportioning methodology to rescreen the original list of designated sites and qualifying species that had been taken through into the RIAA[4]. This rescreening resulted in some sites and qualifying species being screened out. As a result, we required updated screening and reapportionment, with subsequent consideration of any requirement for further Population Viability Analysis (PVA). This applied to kittiwake, herring gull, guillemot and razorbill.

The Applicant did not consider our standard approach to SPA connectivity screening and subsequent apportionment guidance to be appropriate for the Ossian development, due to the offshore location of the Array area which is such that only part of the development site lies within the mean-max foraging range (+1SD) for guillemot and razorbill.

In light of this, the Applicant put forward an alternative approach that instead considered only the northern part of the Array area to have breeding season connectivity to SPAs with guillemot and razorbill qualifying features. This approach, termed the "Foraging Range Zone" method, is further described in Section 1.1 of the Addendum to Appendix 11.1 and was discussed during a meeting held on 11 June 2025. We were unable to accept the "Foraging Range Zone" method as it implied that none of the birds in the remaining part of the Array area were breeding adults and instead, they were all assumed to be immatures or sabbaticals, which we consider to be biologically unrealistic.

As noted in Table 2.2 of the EIA Addendum and Table 2.2 of the RIAA Addendum, at the meeting held on 11 June 2025, we agreed on a project-specific solution involving the use of an 'Expanded Foraging Range' (i.e. MMFR+1SD with Fair Isle data) for guillemot and razorbill. Our agreement was confirmed in written advice issued 02 July 2025. Further comment on this approach is provided below in Section A.3.1.

During post-application discussion and in our advice issued 02 July 2025, we also agreed the reassignment of July to the non-breeding season for guillemot and the post-breeding season for razorbill, which has been applied in the Additional Information. We were able to agree to this adjustment on the basis of peak abundances reported within the Ossian site-specific Digital Aerial Survey campaign and known auk jump dates reported from the Isle of May.

[4] Screening to identify SPA connectivity should be based on species specific mean maximum foraging range + 1 standard deviation (MMFR +1SD) foraging range as per NatureScot guidance note 3, using the edge-to-edge at sea distance. For those sites screened in, impacts are currently then apportioned using a calculation, as per our interim guidance on apportioning (2018) which uses a geometric-to-geometric distance. Confusion can arise when this geometric distance is greater than the initial MMFR+1SD foraging range.

Other points that we raised in our advice on the original Application have also been addressed to our satisfaction, namely:

- The mortality values used in the in-combination assessment for West of Orkney have been revised to the updated mortality figures presented in West of Orkney's Additional Information Addendum (West of Orkney, 2024)[5].
- In the EIA, the Applicant set an increase in baseline mortality of 1% as the threshold to undertake a PVA. In the EIA Addendum PVAs have been undertaken whenever the baseline mortality increased by at least 0.02 percentage points as advised in our guidance.

Overall, we are content that the Additional Information provided has addressed the concerns raised in our previous advice and express our thanks to the Applicant for this.

A.3.1.1 Expanded foraging range for guillemot and razorbill

As above, an 'Expanded Foraging Range Approach' was agreed for guillemot and razorbill (i.e. MMFR+1SD with Fair Isle data; 153.7 km instead of 95.2 km for guillemot and 164.6 km instead of 122.2 km for razorbill).

This approach superseded elements of the screening and apportioning approaches discussed in earlier meetings and correspondence (see Tables 2.2 of the EIA and RIAA addendums), and other alternative approaches proposed by the Applicant during the meeting held 11 June 2025.

The 'Expanded Foraging Range Approach' for guillemot and razorbill apportions breeding season impacts to additional colonies. Under this approach the revised assessment includes:

- Guillemot at Buchan Ness to Collieston Coast SPA
- Guillemot at Farne Islands SPA
- Guillemot at Fowlsheugh SPA
- Razorbill at Fowlsheugh SPA
- Guillemot at Forth Islands SPA
- Razorbill at Forth Islands SPA
- Guillemot at Troup, Pennan and Lion's Heads SPA
- Razorbill at Troup, Pennan and Lion's Heads SPA
- Guillemot at St Abbs to Fast Castle SPA
- Razorbill at St Abbs to Fast Castle SPA

NatureScot's reasoning with respect to agreeing to the use of the expanded foraging range considers the following points:

- High densities of auks were observed in the Ossian site-specific surveys which are highly likely to come from SPA colonies as 95% of guillemot and 76% of razorbill UK breeding populations come from SPAs[6].
- Foraging ranges are variable, and being prescriptive about using a fixed distance in all cases may not always be appropriate.

[5] https://www.westoforkney.com/planning-consent/offshore-application-additional-information

[6] Furness, R.W. 2015. *Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS)*. Natural England Commissioned Reports, Number 164.

- Drawing a hard line across an Array area to determine connectivity is unlikely to be biologically realistic.
- It is highly unlikely that the high densities of birds present in the whole Array area only represent non-breeders, we consider it likely that breeding adults will be present along with immatures, sabbaticals and failed breeders.
- The location of the Ossian Array area which extends across the edge of mainland MMFR+1SD for both species and may therefore contain birds from a wider area than would be expected.

As agreed, the 'Expanded Foraging Range Approach' has been taken forward in the assessments carried out for the submission of Additional Information. However, the Applicant has also presented several arguments within the Additional Information that contest the validity of this approach, see Section 4.2 of the RIAA Addendum and Section 4 (Paragraphs 43 – 58) of the EIA Addendum.

In summary, the Applicant considers there to be available evidence to demonstrate that the "Expanded Foraging Range Approach" is inconsistent with typical guillemot and razorbill behaviour in the Forth and Tay region and results in an overestimation of impacts.

In response to the Applicant's points, we provide the following comments:

1. Extreme and exceptional breeding conditions are becoming more common and poor breeding seasons have been recorded recently on the east coast of Scotland, as well as mortality events such as auk wrecks and HPAI. It is important to note that there is considerable variability between years, with the long-term data from the Isle of May clearly indicating this[7].
2. Significant population declines between Seabird 2000 and Seabirds Count have occurred at some east coast SPAs. For example: Forth Islands SPA 27% decline for guillemot; Troup, Pennan and Lion's Heads SPA 50% decline for guillemot[8].
3. Tracking data cannot be used to explicitly determine that birds will *not* use an area in the breeding season. The existing tracking data referred to by the Applicant is limited. In general, the number of tracks is very low with small sample sizes not necessarily being representative of the population. The tracks are also very restricted in the time periods covered, for example representing only part of a breeding season or a very limited number of years. As more tracking is carried out in the future it should provide a more accurate picture of bird distribution in all seasons, however currently this only gives useful information rather than clear evidence.

A.3.2 Displacement and displacement mortality rates

As set out in Section 4 of both the RIAA and EIA Addendums, the Applicant discusses their considerations regarding methodology and assessment limitations. In Section 4.1, the Applicant considers that the displacement and mortality rates applied under the "High" approach to

[7] https://www.ceh.ac.uk/our-science/projects/isle-may-long-term-study
[8] Burnell, D., Perkins, A., Newton, S., Bolton, M., Tierney, T., and Dunn, T. (2023). Seabirds count: a census of breeding seabirds in Britain and Ireland (2015-2021). Lynx Nature Books, Barcelona.

assessment for guillemot and razorbill (as set out in NatureScot Guidance Note 8[9]) are not supported by the best available scientific information. The Applicant cites studies and reports to support this view, and we acknowledge the narrative provided which is useful to consider.

In our view, however, the emerging evidence regarding distributional responses is mixed and at this point in time is currently insufficiently conclusive for us to change our guidance in this respect. Pending further research, we consider that the NatureScot displacement and displacement mortality rates apply appropriate precaution.

However, although our assessment is based on the NatureScot approach, it is useful to have the Applicant's approach for context, and we considered this. We appreciate the Applicant's concerns regarding the high displacement mortality rate and where the difference between the low and high displacement counterfactuals could lead to an uncertain conclusion, a mid-figure is also considered within our assessments together with other contextual information as discussed below.

We provide the following comments in relation to the evidence provided by the Applicant:

- The Applicant cites Searle *et al.* (2017)[10] and van Kooten *et al.* (2019) [11] in support of its position, with Searle *et al* being used in the McArthur Green (2019)[12] report, also cited. However, the IBM approach from Searle *et al.* is seasonally restricted to the chick-rearing period and has a high level of uncertainty associated with parameter estimation within the model. The geographical context of the van Kooten IBM approach is not relevant to Scottish waters. In view of these points, we don't consider that these studies provide sufficient evidence to alter our view on displacement rates.
- The APEM (2022)[13] report cited provides a valuable review of auk displacement, including highlighting the variability and uncertainty in reported displacement rates for auks. However, a more recent study, Lamb *et al* (2024),[14] has not been mentioned. This is a more extensive meta-analysis of displacement studies. This research indicates that effects were significant and negative for auks, though it doesn't specify rates. It found that the presence and strength of distributional change varied most strongly between species and seasons, study design criteria and windfarm characteristics. These studies highlight the difficulties in specifying displacement rates and the need for further research.

[9] Guidance Note 8: Guidance to support Offshore Wind Applications: Marine Ornithology Advice for assessing the distributional responses, displacement and barrier effects of Marine birds. https://www.nature.scot/doc/guidance-note-8-guidance-support-offshore-wind-applications-marine-ornithology-advice-assessing

[10] Searle, K.R., Mobbs, D.C., Butler, D., Furness, R.W., Trinder, M.N. and Daunt, F. 2017. Fate of displaced birds. CEH Report NEC05978 to Marine Scotland Science

[11] Van Kooten, T., Soudijn, F., Tulp, I., Chen, C., Benden, D., and Leopold, M. (2019). The consequences of seabird habitat loss from offshore wind turbines, version 2: Displacement and population level effects in 5 selected species. Wageningen Marine Research report; No. C063/19.

[12] MacArthur Green (2019). Evidence Review of Displacement and Mortality Rates for Seabirds in Offshore Wind Farm Assessments. Cited in Norfolk Vanguard Offshore Wind Farm – Appendices to Written Questions, Deadline 1 Submission

[13] APEM (2022a). Review of evidence to support auk displacement and mortality rates in relation to offshore wind farms. APEM Scientific Report, P00007416, Ørsted.

[14] Lamb, J., Gulka, J., Adams, E., Cook, A., & Williams, K. A. (2024). A synthetic analysis of post-construction displacement and attraction of marine birds at offshore wind energy installations. Environmental Impact Assessment Review, 108, 107611.

- Pre-construction and construction survey data from Beatrice Offshore Wind Farm, used in a study by McArthur Green (2024)[15], is considered to support the Applicant's view. This study concludes that the upper end of the displacement rates currently used in assessments (30–70%) is likely to significantly overestimate the extent to which guillemot is displaced from operational wind farms. However, this study only considers within-wind farm displacement (meso-avoidance) and does not consider displacement from the whole wind farm footprint (macro-avoidance). Therefore, in our view this study does not provide good evidence for the overall displacement impact on auks as it focuses only on birds that are present within the wind farm.
- A study by Peshco *et al* (2024)[16] assessed the cumulative impacts of all operating offshore wind farms on guillemots in the German North Sea. Guillemot numbers peak during autumn to approximately 90,000 individuals. The study found that guillemot density in autumn was significantly reduced within a radius of 19.5 km around operating offshore wind farms. This evidence of avoidance of offshore wind farms by guillemot is not presented by the Applicant.

A.3.3 Approach to in-combination projects - RIAA

A.3.3.1 Consented projects

We note that within the SPA assessments, the impact (i.e. mortality) which is to be addressed by compensatory measures for the Green Volt and Berwick Bank projects, consented in April 2024 and July 2025 respectively, has been removed from the in-combination totals. We are content to accept this approach.

West of Orkney was also consented in June 2025 with a requirement for compensatory measures. While the updated mortality figures from the West of Orkney Additional Information have been used in the Ossian Additional Information, the Applicant has not removed compensated impacts in the same way as they removed these from Berwick Bank and GreenVolt.

In addition, we also note that Salamander has not been included in the assessments in any form, even though it was also consented in July 2025. Any impacts from Salamander that do not require compensation should be included, while those requiring compensation should be excluded.

We suggest these aspects are resolved through the ongoing work in relation to the developer led HRA in-combination approach for Ossian, Muir Mhòr and Caledonia, as referred to above in Section A.2.2.

A.3.3.2 Projects awaiting determination

Other projects for which impact data is likely to be available, and that should also have been included in the in-combination assessment, include Cenos, Buchan, Muir Mhor and Caledonia. The exclusion of these projects is likely to have reduced the total impacts and we have taken this into account in our assessments.

[15] MacArthur Green (2023). Beatrice Offshore Wind Farm: Year 2 Post-construction Ornithological Monitoring Report.
[16] Peschko, V., Schwemmer, H., Mercker, M., Markones, N., Borkenhagen, K., & Garthe, S. (2024). Cumulative effects of offshore wind farms on common guillemots (Uria aalge) in the southern North Sea-climate versus biodiversity?. Biodiversity and Conservation, 33(3), 949-970.

A.3.4 Cumulative impacts - EIA

In instances where a significant effect has been identified under EIA and an AEoSI has been identified for the same species in the RIAA, we accept that EIA impacts can be offset through compensatory measures.

Within the EIA Addendum Section 6 and Section 8 (Paragraph 447), the Applicant states that many of the projects included in the cumulative assessment have already been consented and are required to deliver compensation for a proportion of their predicted impacts.

However, it is noted that the EIA Addendum does not account for these "compensated" birds as removing them from the original abundance values is too complex (see Paragraphs 251, 319 and 424). Specifically, for kittiwake the predicted impacts from Berwick Bank, Green Volt, Hornsea Project THREE, Norfolk Vanguard, Norfolk Boreas, East Anglia ONE North and East Anglia TWO on SPA features requiring compensation are included. For guillemot and razorbill, the predicted impacts from Green Volt and Berwick Bank on SPA features requiring compensation are included. The Applicant highlights that, in their view, including these "compensated" impacts in PVAs inflates cumulative effect estimates. We have considered this in our assessment.

Although within the EIA Addendum, "compensated" impacts have not been removed it has been helpful to consider the scenarios including and excluding Berwick Bank.

In addition, there are a number of relevant Scottish projects where updated data should have been used in the cumulative assessments. As stated above, these include Salamander, Cenos, Buchan, Muir Mhor, and Caledonia.

A.3.5 Consideration of seabird assemblage features

Within the RIAA Addendum, the Applicant has assessed named qualifying species of seabird assemblage features in terms of the impact on the assemblage only.

We highlight that any named qualifying species of an assemblage feature in an SPA is protected in its own right. The SPA Conservation Objectives are set for individual species rather than the assemblage and therefore the features should be assessed and any impacts concluded at the individual species level.

As highlighted in our advice on the original Application, this has been the established position in Scotland for quite some time, however, we understand that this differs from the approach taken in England.

Our assessments are based on impacts to individual species. As such, for those SPAs which have a seabird assemblage feature, where we have concluded AEoSI for at least one named species of the seabird assemblage, then that is also the conclusion for the assemblage feature. Our conclusions regarding seabird assemblage are provided below in A.5.4.

A.3.6 Proportion of adults in the population - kittiwake

Within Table 7.5 of the RIAA Addendum *'Kittiwake Displacement Mortality Apportioned to Each SPA or Ramsar (NatureScot Approach)'* we note that the kittiwake adult proportion of the population in the breeding season is stated as 0.84. This is considerably higher than the value

typically used (i.e. around 0.53[17]). As a result, kittiwake adult mortality from the project is likely to be overestimated. We have considered this within our assessments.

A.4 NatureScot appraisal – EIA

The Additional Information provides re-assessment of kittiwake, herring gull, guillemot and razorbill under EIA. Noting the approach to re-assessment discussed in Section A.3 and detailed in the Addendum to Chapter 11, our appraisal of the updated impact assessment is provided below.

A.4.1 Proposal alone impact assessment

For all species assessed, the Applicant concludes that none of the proposal alone impacts are significant in EIA terms. We agree with the Applicant's conclusions under EIA.

We conclude a negligible magnitude of impact for kittiwake and razorbill, based on the percentage point change in mortality from total annual adult mortalities which is below the 0.02 threshold for PVA.

For guillemot, the percentage point change in mortality from total annual adult mortalities was above the 0.02 threshold and a PVA was undertaken. However, considering the CPS values we conclude a low magnitude of impact as outlined in Table 4 below.

Table 4. Summary of EIA Addendum project alone impacts and PVA after 35 years

Species	Regional population	Total annual adult mortalities	Percentage point change in mortality	PVA - CPS
Kittiwake	829,937	54.72 - 79.72	0.007 to 0.010	Not required
Guillemot	625,316	488 - 1,199	0.078 to 0.192	0.9814-0.9453
Razorbill	591,874	28 - 69	0.005 to 0.012	Not required

A.4.2 Cumulative impact assessment

The species for which an updated assessment has been provided for cumulative impacts are kittiwake, herring gull, guillemot, and razorbill. These species are assessed for the following impacts:

- Kittiwake - collision and displacement
- herring gull - collision
- guillemot – displacement
- razorbill - displacement

The tables below set out the results and significance of effect conclusions presented in Section 6 of the EIA Addendum based on the "NatureScot approach" (i.e. that based on displacement and mortality rates as outlined in NatureScot Guidance Note 8 rather than the Applicant Approach discussed in Section 4 and also presented throughout Section 6). Two scenarios are presented,

[17] Furness, R.W. 2015. *Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS)*. Natural England Commissioned Reports, Number 164.

these are including Berwick Bank and excluding Berwick Bank. For each scenario, a PVA has been used to inform the potential magnitude of impact after 35 years.

As discussed above in A.3.4, the Applicant has not removed "compensated" impacts from other projects, although scenarios including and excluding Berwick Bank are presented.

A.4.2.1 Kittiwake

Table 5. Summary of EIA Addendum PVA results and EIA significance of effect conclusions for kittiwake, with NatureScot conclusion.

Scenario	Annual % point change in mortality	Median CPS	Median CGR	Applicant conclusion	NatureScot conclusion
Including Berwick Bank	0.509 to 0.664	0.8046-0.7529	0.9940-0.9921	Minor adverse	Moderate adverse
Excluding Berwick Bank	0.373 to 0.495	0.8525-0.8094	0.9956-0.9941	Minor adverse	Moderate adverse

We conclude the overall cumulative effect on kittiwake to be moderate adverse and significant in EIA terms, both including and excluding Berwick Bank Offshore Wind Farm. Our conclusion of **moderate adverse significance** is based on the following:

- Medium magnitude of impact due to:
  - the very low CPS and CGR with Berwick Bank, indicating a decline in population size of up to 25% and a decrease in growth rate of up to 0.8%.
  - the moderately low CPS and CGR without Berwick Bank indicating a decline in population size of up to 19%, and a decrease in growth rate of up to 0.6%.
- High sensitivity of the receptor due to:
  - the moderate sensitivity of kittiwake to offshore wind developments,
  - the 57% decline in the population size of kittiwake in Scotland between Seabird 2000 and Seabirds Count, suggesting that recovery following the cessation of the development activity would likely be slow,
  - the effects of the recent HPAI outbreak on kittiwake. NatureScot's Avian Influenza report[18] on the impacts of HPAI estimated the 2022 HPAI outbreak to have been of high impact,
  - international importance of the species,
  - overall low recoverability.

[18] https://www.nature.scot/doc/naturescot-scientific-advisory-committee-sub-group-avian-influenza-report-h5n1-outbreak-wild-birds

A.4.2.2 Herring gull

Table 6. Summary of EIA Addendum PVA results and EIA significance of effect conclusions for herring gull, with NatureScot conclusion.

Scenario	**Annual % point change in mortality**	**Median CPS** (after 35 years)	**Median CGR** (after 35 years)	**Applicant conclusion**	**NatureScot conclusion**
Including Berwick Bank	0.108	0.9544	0.9987	Minor adverse	Minor adverse
Excluding Berwick Bank	0.097	0.9587	0.9988	Minor adverse	Minor adverse

For herring gull, we are in agreement with the Applicants conclusion of low magnitude of impact and minor adverse significance, which is **not significant** in EIA terms.

A.4.2.3 Guillemot

Table 7. Summary of EIA Addendum PVA results and EIA significance of effect conclusions for guillemot, with NatureScot conclusion.

Scenario	**Annual % point change in mortality**	**Median CPS** (after 35 years)	**Median CGR** (after 35 years)	**Applicant conclusion**	**NatureScot conclusion**
Including Berwick Bank	0.472 to 0.949	0.8259-0.6801	0.9947-0.9894	Moderate adverse	Moderate adverse
Excluding Berwick Bank	0.217 to 0.466	0.9162-0.8279	0.9976-0.9948	Minor adverse	Moderate adverse

We conclude that the overall cumulative effect for guillemot to be moderate adverse and therefore significant in EIA terms, both including and excluding Berwick Bank Offshore Wind Farm. Our conclusion of **moderate adverse significance** is based on the following:

- Medium magnitude of impact due to:
  - the very low CPS and CGR with Berwick Bank, which indicate a decline in population size (up to 32%) and growth rate (up to 1%) after 35 years.
  - the moderately low CPS and CGR without Berwick Bank, which indicate a decline in population size (up to 17%) and growth rate (up to 0.5%) after 35 years.
- High sensitivity of the receptor due to:
  - the moderate vulnerability of guillemot to displacement,
  - the 31% decline in the population size of guillemot in Scotland between Seabird 2000 and Seabirds Count,
  - the effects of the recent HPAI outbreak on guillemot. NatureScot's Avian Influenza report on the impacts of HPAI estimated the 2022 HPAI outbreak to have been of high impact,
  - overall low recoverability.

A.4.2.4 Razorbill

Table 8. Summary of EIA Addendum PVA results and EIA significance of effect conclusions for razorbill, with NatureScot conclusion.

Scenario	**Percentage point change in mortality**	**Median CPS** (after 35 years)	**Median CGR** (after 35 years)	**Applicant conclusion**	**NatureScot conclusion**
Including Berwick Bank	0.201 to 0.534	0.9180-0.7963*	0.9976-0.9937	Minor adverse	Moderate adverse
Excluding Berwick Bank	0.186 to 0.506	0.9237-0.8061*	0.9978-0.9940	Minor adverse	Moderate adverse

** Where the difference between the low and high displacement counterfactuals could lead to an uncertain conclusion, a mid-figure is also considered within our assessment.*

We conclude that the overall cumulative effect for razorbill is moderate adverse and therefore significant in EIA terms, both including and excluding Berwick Bank Offshore Wind Farm. Our conclusion **moderate adverse significance** is based on consideration of the following:

- Medium magnitude of impact due to:
  - the low CPS and CGR for the high displacement for both scenarios, which indicate a decline in population size (up to 20%) and growth rate (up to 0.6%) after 35 years.
  - the moderately low CPS and CGR without Berwick Bank, which indicate a decline in population size (up to 19%) and growth rate (up to 0.6%) after 35 years.
- Medium sensitivity of the receptor due to:
  - the moderate sensitivity of razorbill to displacement,
  - the 2% decline in the population size of razorbill in Scotland between Seabird 2000 and Seabirds count,
  - international value of the species,
  - overall medium recoverability.

In line with established EIA practice, we expect mitigation to be identified where a Significant adverse effect is identified. Without prejudging the outcome of the Appropriate Assessment, we anticipate that, should consent be granted, compensatory measures would need to be secured for kittiwake, guillemot and razorbill. We consider that agreed compensation measures would be sufficient to address impacts predicted under EIA for these species.

A.5 NatureScot appraisal – RIAA

A.5.1 PVA results and determination of AEoSI for SPAs

Our assessments of AEoSI are primarily based on the PVA Counterfactual of Population Size (CPS) outputs, after 35 years, using the NatureScot approach. However, in reaching our conclusions we also consider a range of other factors including:

- Counterfactual of Population Growth Rate (CGR) outputs and the % decrease in population growth rate

- Status of the population including short and long-term trends
- Condition of the feature
- Species ecology
- Proportional importance of species in Scotland and UK
- Impacts of HPAI and other recent mortality events
- The contribution of the project to in-combination impacts.

We have also considered the points discussed above regarding approach to assessment.

A.5.2 Proposal alone assessment of AEoSI

For species and sites re-assessed within the Additional Information, the Applicant concludes no AEoSI from project-alone impacts. We also conclude there to be no AEoSI from project-alone impacts, see Table 1 in Section A.2.1 above.

A.5.3 In-combination assessment of AEoSI

Within the in-combination assessment, the Applicant has presented scenarios including and excluding Berwick Bank for some features at some SPAs. However, for specific SPA features that Berwick Bank is required to compensate a "Berwick Bank Compensated" scenario is presented in light of the consent awarded to the Berwick Bank project in July 2025. We are content to accept this approach; however, we are not aware of this being agreed with NatureScot or MD-LOT prior to submission of the Additional Information. In Section A.3.3 above we provide further comment on projects included within the in-combination assessment.

As highlighted above in Section A.2.2, we are aware of an issue with the in-combination assessment, stemming from three developments (Ossian, Muir Mhòr and Caledonia) submitting Additional Information at a similar time to each other.

We note that work is currently being undertaken (led by Muir Mhòr supported by Ossian and Caledonia) to develop a collective approach across these three developments to address this issue, subject to agreement with Marine Directorate and NatureScot. Depending on the outcome of this work, our final advice on in-combination impacts may change.

Therefore, our advice below is based on the current assessment as is presented in the Additional Information submission.

A.5.3.1 In-combination assessment – individual SPA assessments

As summarised above in Section A.2.2, for some SPAs and species assessed within the RIAA Addendum the percentage point change in adult survival did not meet the 0.02 threshold or the mortality from the project was less than 0.2 birds per annum and, therefore, PVA was not undertaken. Our advice has since been updated, such that we no longer accept use of the 0.2birds/annum threshold. However, this approach is in-line with our guidance provided in relation to the Application at that time (see Table 2.1 of the RIAA Addendum).

We provide advice on the PVA results after 35 years and our determination of AEoSI for seabird SPAs, based on the NatureScot approach. A summary of our advice is provided in Table 2 (Section A.2.2) and assessments for individual SPAs and species where we have concluded AEoSI, or have been unable to conclude no AEoSI, are detailed below.

Buchan Ness to Collieston Coast SPA

Table 9. PVA results for Buchan Ness to Collieston Coast SPA after 35 years.

Species	CPS* (Berwick Bank compensated)	CPS* (with Berwick Bank)	CPS* (without Berwick Bank)	Additional mortality from project alone (birds/annum)	NatureScot conclusion of AEoSI
Kittiwake	0.882/0.868			6.5	AEoSI
Guillemot		0.967/0.864	0.972/0.883	73.7	Unable to conclude no AEoSI

**CPS values - low displacement mortality rate value followed by high displacement mortality rate value*

We **conclude AEoSI** for kittiwake at Buchan Ness to Collieston Coast SPA, considering:

- the moderately low CPS values for both scenarios,
- a population decline of up to 13.2%,
- a decrease in population growth rate of up to 0.4%,
- the unfavourable condition of the feature,
- a 19% population decline between Seabird 2000 and Seabirds Count.

We are **unable to conclude no AEoSI** for guillemot at Buchan Ness to Collieston Coast SPA, considering:

- the moderately low CPS for the high displacement rate both with and without Berwick Bank,
- a population decline of up to 13.6% for the high displacement rate,
- a decrease in population growth rate of up to 0.4% for the high displacement rate,
- the very high contribution from the project – up to 51%,
- the favourable condition of the feature,
- the relatively stable population.

The Applicant concludes that AEoSI cannot be ruled out for both species, under the NatureScot approach.

East Caithness Cliffs SPA

Table 10. PVA results for East Caithness Cliffs SPA after 35 years.

Species	CPS (Berwick Bank compensated)	Additional annual mortality from project alone	NatureScot conclusion of AEoSI
Kittiwake	0.790-0.712	4.3	AEoSI

We conclude **AEoSI** for kittiwake at East Caithness Cliffs SPA, considering:

- the very low CPS values,
- a population decrease of up to 28% over 35 years,
- a decrease in population growth rate of up to 0.9%,
- a 39% population decline between Seabird 2000 and Seabirds Count.

Although the contribution from the project is relatively small, we consider that any additional mortality is significant for kittiwake at this site given the very low CPS and the declining population.

The Applicant concludes that AEoSI cannot be ruled out, under the NatureScot approach.

Forth Islands SPA

Table 11. PVA results for Forth Islands SPA after 35 years.

Species	CPS (Berwick Bank compensated)	Additional mortality from project alone	NatureScot conclusion of AEoSI
Kittiwake	0.857-0.794	1.9	AEoSI
Guillemot	0.931/0.720	69.9	AEoSI
Razorbill	0.928/0.674	1.8	AEoSI

We conclude **AEoSI** for kittiwake at Forth Islands SPA, considering:

- the very low CPS for the high displacement scenario,
- a population decline of 20% for the high displacement scenario,
- a decrease in population growth rate of 0.6% for the high displacement scenario,
- a 22% population decline between Seabird 2000 and the Seabirds Count,
- the unfavourable condition of the feature.

Although the contribution from the project is small, we consider that any additional mortality is significant for kittiwake at this site given the very low CPS and the declining population.

We conclude **AEoSI** for Guillemot at Forth Islands SPA, considering:

- the very low CPS for the high displacement scenario,
- a population decline of 28% for the high displacement scenario,
- a decrease in population growth rate of 0.9% for the high displacement scenario,
- a 27% population decline between Seabird 2000 and the Seabirds Count,
- the significant contribution of the project to the in-combination total (24%),
- where there is a significant difference between the high and low displacement scenarios, we also consider a mid-point CPS value in our assessment. This value would still be of concern.

We conclude **AEoSI** for razorbill at Forth Islands SPA, considering:

- the very low CPS for the high displacement scenario,
- a population decline of 32% for the high displacement scenario,
- a decrease in population growth rate of 1.1% for the high displacement scenario,
- a population increase of 23% between Seabirds 2000 and Seabirds Count, so the impacted population change would indicate a marked change in this trend,
- where there is a significant difference between the high and low displacement scenarios, we also consider a mid-point CPS value in our assessment. This value would still be of concern.

The Applicant concludes that AEoSI cannot be ruled out for all three species, under the NatureScot approach.

Fowlsheugh SPA

Table 12. PVA results for Fowlsheugh SPA after 35 years.

Species	CPS (Berwick Bank compensated)	Additional mortality from project alone	NatureScot conclusion of AEoSI
Kittiwake	0.866/0.815	9.4	AEoSI
Guillemot	0.953/0.800	191.8	Unable to conclude no AEoSI
Razorbill	0.963/0.826	4.5	Unable to conclude no AEoSI

We conclude **AEoSI** for kittiwake at Fowlsheugh SPA, considering:

- the low CPS for both scenarios,
- a population decline of 18% for the high displacement scenario,
- a decrease in population growth rate of 0.6% for the high displacement scenario,
- a 51% decrease in population between Seabird 2000 and Seabirds Count,
- the unfavourable condition of the feature.

We are **unable to conclude no AEoSI** for Guillemot at Fowlsheugh SPA, considering:

- the low CPS for the high displacement scenario,
- a population decline of 20% for the high displacement scenario,
- a decrease in population growth rate of 0.6% for the high displacement scenario,
- the stable population - 1% increase in population between Seabird 2000 and Seabirds Count,
- the very significant contribution of the project to the in-combination total (36%),
- where there is a significant difference between the high and low displacement scenarios, we also consider a mid-point CPS value in our assessment. This value is also of concern.

We are **unable to conclude no AEoSI** for razorbill at Fowlsheugh SPA, considering:

- the low CPS for the high displacement scenario,
- a population decline of 17.4% for the high displacement scenario,
- a decrease in population growth rate of 0.5% for the high displacement scenario,
- 92% increase in population between Seabird 2000 and Seabirds Count so the impacted population change would indicate a marked change in this trend,
- favourable condition of the feature,
- where there is a significant difference between the high and low displacement scenarios, we also consider a mid-point CPS value in our assessment. This value is also of concern.

The Applicant concludes that AEoSI cannot be ruled out, for all three species, under the NatureScot approach.

North Caithness Cliffs SPA

Table 13. PVA results for North Caithness Cliffs SPA after 35 years.

Species	CPS (Berwick Bank compensated)	Additional annual mortality from project alone	NatureScot conclusion of AEoSI
Kittiwake	0.830/0.789	0.8	AEoSI

We conclude **AEoSI** for kittiwake at North Caithness Cliffs SPA, considering:

- the significantly low CPS for both scenarios,
- a population decline of up to 21%,
- a decrease in population growth rate of up to 0.7%,
- the unfavourable condition of the feature,
- a 45% decline in the population between Seabird 2000 and Seabirds Count.

Although the contribution from the project is very small, we consider that any additional mortality is significant for kittiwake at this site given the very low CPS and the declining population.

The Applicant concludes that AEoSI cannot be ruled out under the NatureScot approach.

St Abbs Head to Fast Castle SPA

Table 14. PVA results for St Abbs Head to Fast Castle SPA.

Species	CPS (Berwick Bank compensated)	Additional mortality from project alone	NatureScot conclusion of AEoSI
Kittiwake	0.910/0.867	2.7	Unable to conclude no AEoSI
Guillemot	0.965/0.854	119.6	Unable to conclude no AEoSI
Razorbill	0.997-0.908	0.9	No AEoSI

We are **unable to conclude no AEoSI** for kittiwake at St Abbs Head to Fast Castle SPA, considering:

- the moderately low CPS for the high displacement scenario,
- a population decline of 13% for the high displacement scenario,
- a decrease in population growth rate of 0.4% for the high displacement scenario,
- a 68% decline in the population between Seabird 2000 and Seabirds Count,
- the unfavourable condition of the feature.

Although the contribution from the project is small, we consider that any additional mortality is significant for kittiwake at this site given the seriously declining population.

We are **unable to conclude no AEoSI** for Guillemot at St Abbs Head to Fast Castle SPA, considering:

- the moderately low CPS for the high displacement scenario,
- a population decline of 14.6 % for the high displacement scenario,
- a decrease in population growth rate of 0.4% for the high displacement scenario,
- the very high contribution of the project to the in-combination total (50%),

- the relatively stable population,
- the favourable condition of the feature.

We are able to conclude **no AEoSI** for razorbill at St Abbs Head to Fast Castle SPA, considering:

- the only slightly low CPS for the high displacement scenario,
- a population decline of 9% for the high displacement scenario,
- a decrease in population growth rate of 0.2% for the high displacement scenario,
- the favourable condition of the feature,
- a small 7% decline in the population between Seabird 2000 and Seabirds Count.

The Applicant concludes that AEoSI cannot be ruled out for all three species, under the NatureScot approach.

Troup, Pennan and Lion's Heads SPA

Table 15. PVA results for Troup, Pennan and Lion's Heads SPA.

Species	**CPS (Berwick Bank compensated for)**	**CPS (with BB)**	**CPS (without BB)**	**Additional annual mortality from project alone**	**NatureScot conclusion of AEoSI**
Kittiwake	0.876/0.832			3.5	AEoSI
Guillemot		0.966/0.866	0.969/0.878	54.1	Unable to conclude no AEoSI
Razorbill	0.979/0.914			0.8	No AEoSI

We conclude **AEoSI** for kittiwake at Troup, Pennan and Lion's Heads SPA, considering:

- the moderately low CPS for both scenarios,
- a population decline of up to 16.8%,
- a decrease in population growth rate of up to 0.5%,
- the unfavourable condition of the feature,
- a 44% decline in population between Seabird 2000 and Seabirds Count.

Although the contribution from the project is small, we consider that any additional mortality is significant for kittiwake at this site given the seriously declining population.

We are **unable to conclude no AEoSI** for guillemot at Troup, Pennan and Lion's Heads SPA considering:

- the moderately low CPS for the high displacement scenario, with and without Berwick Bank,
- a decrease in population growth rate of up to 0.4% for the high displacement scenario,
- a population decline of 13.4% for the high displacement scenario,
- the unfavourable condition of the feature,
- a 50% decline in population between Seabird 2000 and Seabirds Count,
- the very significant contribution from the project (almost 50%).

We conclude **no AEoSI** for razorbill at Troup, Pennan and Lion's Heads SPA, considering:

- the only slightly low CPS for the high displacement scenario
- a decrease in population growth rate of up to 0.2%
- a population decline of 8.6% for the high displacement scenario
- a 9% decline in population between Seabird 2000 and Seabirds Count
- the favourable condition of the feature.

The Applicant concludes that AEoSI cannot be ruled out for all three species, under the NatureScot approach.

A.5.4 Seabird assemblage features

Any named qualifying species of an assemblage feature in an SPA is protected in its own right. The SPA Conservation Objectives are set for individual species rather than the assemblage and therefore the features should be assessed and any impacts concluded at the individual species level.

For those SPAs which have a seabird assemblage feature, where we have concluded AEoSI for at least one named species of the seabird assemblage, then then same conclusion is reached for the seabird assemblage feature.

For the seabird assemblage feature (and named species) we therefore **conclude AEoSI in-combination** at:

- Buchan Ness to Collieston Coast (kittiwake)
- East Caithness Cliffs (kittiwake)
- Forth Islands (kittiwake, guillemot, razorbill)
- Fowlsheugh (kittiwake)
- North Caithness Cliffs (kittiwake)
- Troup, Pennan and Lion's Heads (kittiwake)

For the seabird assemblage feature (and named species) we are **unable to conclude no AEoSI in-combination** at:

- Buchan Ness to Collieston Coast (guillemot)
- Fowlsheugh (guillemot, razorbill)
- Troup, Pennan and Lion's Heads (guillemot)
- St Abbs Head to Fast Castle (kittiwake, guillemot)

A.5.5 Marine SPAs

Outer Firth of Forth and St Andrews Bay Complex (OFFSABC)

Our assessment of impacts to the OFFSABC marine SPA breeding seabird qualifying features has been undertaken with respect to the functionally linked breeding colony SPAs.[19] These are listed in Table 16 below along with relevant features and our colony SPA conclusions for AEoSI.

[19] Conservation and Management Advice (2022) Outer Firth of Forth and St Andrews Bay Complex Special Protection Area (SPA)

Table 16. Summary of NatureScot conclusions for OFFSABC.

SPA	Species	NatureScot conclusion for colony SPA
Buchan Ness to Collieston Coast	Kittiwake	AEoSI
	Guillemot	Unable to conclude no AEoSI
Forth Islands	Kittiwake	AEoSI
	Guillemot	AEoSI
	Razorbill	AEoSI
Fowlsheugh	Kittiwake	AEoSI
	Guillemot	Unable to conclude no AEoSI
	Razorbill	Unable to conclude no AEoSI
St Abbs Head to Fast Castle	Kittiwake	Unable to conclude no AEoSI
	Guillemot	Unable to conclude no AEoSI
	Razorbill	No AEoSI
Troup, Pennan and Lion's Heads	Kittiwake	AEoSI
	Guillemot	Unable to conclude no AEoSI
	Razorbill	No AEoSI

NATURESCOT ADVICE ON OSSIAN OFFSHORE WIND FARM – ADDITIONAL INFORMATION

Appendix B - Derogation

As part of the Additional Environmental Information submission, the Applicant has included an Addendum to the previously submitted Derogation Case, which was provided on a without prejudice basis alongside the original Application (28 June 2024).

B.1 Background

In our response to the original Application (dated 20 September 2024), we welcomed the Applicant's consideration of compensation measures and provided initial advice on the principle of each measure in terms of their ecological feasibility. However, we advised that the Outline Compensation Implementation and Monitoring Plan (CIMP) was high level and that further dialogue would be required as the Application determination progressed. We also advised that if the proposal was consented, greater detail on aspects of the CIMP would be required with respect to both proposed compensatory measures.

Subsequently, following the provision of our advice at Application, we have continued discussions with the Applicant on the proposed compensation measures, including attending a site visit to discuss the mink reduction measure.

We have also elicited expert advice from mink experts in the UK, including Professor Xavier Lambin from the University of Aberdeen and the RSPB, to discuss this potential compensation measure further. In addition, liaison has been undertaken with mink researchers from the Norwegian Institute for Nature Research (NINA). These discussions have been invaluable, alongside the review of evidence available, to help inform our advice on this proposed compensation measure.

It is noted that the Applicant informed MD-LOT in November 2024 that the development of the proposed compensatory measures would be progressed jointly and collaboratively with the Salamander Wind Project Company who subsequently secured consent in July 2025. Therefore, we welcome the inclusion of the predicted impacts and compensation requirements of Salamander Offshore Wind Farm alongside those predicted by this proposal within the Addendum to the Derogation Case. At times we therefore refer to the 'Applicants' which reflects this collaboration.

Advice is provided below on the Addendum to the Derogation Case, focusing on the ecological feasibility of the proposed compensatory measures, whilst acknowledging that the Appropriate Assessment has yet to be finalised and as such the SPAs and qualifying species for which compensation may be required remains unconfirmed.

Our detailed advice builds upon our advice submitted in response to the original Application (20 September 2024), which is still relevant.

B.2 Summary of NatureScot advice

The Addendum to the Derogation Case outlines two proposed compensation measures:

- To fund the continuation of the Scottish Invasive Species Initiative (SISI) Mink Control Project (MCP) once existing funding ends to ensure the continued existence of the MCP, and to intensify control within areas already covered by the MCP (Objective A). Coverage

of the SISI MCP to areas not currently covered at present will be undertaken as part of an adaptive management strategy (Objective B) if required.

- To reduce bycatch of gannets in Portuguese waters in partnership with the Portuguese Society for the Study of Birds (SPEA).

Overall, we acknowledge that the Applicants have tried to address our previous concerns, noting that we collectively acknowledge that uncertainties remain. Key uncertainties, in our view, are around mink accessibility at the SPAs identified in Objective A[20] and mink density values. The Applicants have set out how proposed work will help reduce some of these uncertainties, but the results will not be available in the immediate future.

Despite these uncertainties, we can advise from an ecological feasibility perspective, that the proposed measures are likely to compensate for the impacts predicted, although further refinement will be required prior to the submission of the CIMP.

Therefore, there is a need for ongoing, continuing dialogue with all parties, and we request that if this proposal is consented, the final CIMP should be agreed prior to operation of the wind farm.

We provide detailed advice on each proposed compensation measure below.

B.3 Detailed NatureScot advice

B.3.1 Mink control

As detailed above, this proposed measure involves funding the continuation of the SISI MCP to ensure the continued existence of the project and to intensify control within areas already covered by the MCP to safeguard target SPAs (Objective A) from mink incursion to offset the predicted impact from the operation of both wind farms. As part of the adaptive management measures, if required, coverage of the SISI MCP would be increased to areas that are not covered at present (Objective B).

It is noted in Section 4.1 that the information contained within the Addendum to the Derogation Case is an updated version of the 'Ossian and Salamander Mink Control Compensation Note' (NIRAS, 2025a). We were consulted on the Ossian and Salamander Mink Control Compensation Note as part of the Salamander Offshore Wind Farm HRA Derogation Case and advice on this was provided to MD-LOT in a letter dated 21 May 2025.

In this advice, we acknowledged the work undertaken to reduce uncertainties previously highlighted but noted that uncertainties remained over the calculation used to estimate the level of compensation provided by the measure, including mink density, mink accessibility to cliff nesting seabirds and the assumption that 200 chicks per mink per season would be protected.

Despite this, we were able to advise from an ecological feasibility perspective that the proposed measure was likely to compensate for the impacts predicted for the Salamander Offshore Wind Farm. We also advised the need for ongoing, continuing dialogue and that the final Compensation Plan should be agreed prior to the operation of the wind farm, if consented.

[20] Target SPAs under Objective A are Fowlsheugh, Buchan Ness to Collieston Coast and Troup, Pennan and Lion's Heads SPAs.

It is noted in Paragraph 49, Section 4.1 that the Addendum to the Derogation Case provides further evidence, clarifications and examples of mink accessing and predating cliff-nesting seabirds and acknowledges limitations surrounding the determination of mink accessibility. We thank the Applicants for considering our concerns further.

Our advice below predominantly uses the headings and order as set out in the Addendum to the Derogation Case, which follows the flow chart in Figure 4.3. The flow chart details the process for determining the impact of mink predation on guillemot, kittiwake, puffin and razorbill, and the scale of compensation required for mink control.

B.3.1.1 Mink access

We previously raised concerns (21 May 2025) over the assumption that all seabird nests along the whole length of the target SPAs would be accessible to mink and recommended that site-specific surveys at the target SPAs were carried out to assess the level of accessibility of the cliff nesting habitat to mink.

Site visits were carried out at the target Objective A SPAs on 8 and 9 July 2025 to access mink accessibility. NatureScot and representatives from Salamander, Ossian and NIRAs independently visited Troup, Pennan and Lion's Heads SPA on 8 July and a joint visit was undertaken at Buchan Ness to Collieston Coast SPA and Fowlsheugh SPA on 9 July.

There was general agreement on mink accessibility during the site visits at all three Objective A SPAs and it was felt that although potential accessibility varied across the three SPAs, mostly as a result of the underlying geology, a good percentage of the cliffs could be accessible to mink although not 100%, except potentially for puffin, which were more likely to be 100% accessible.

We agree with the Applicants that as the majority of puffin nest in ground burrows towards the top of the cliff, they are more accessible to predation by mink and thus accept the 100% accessibility value proposed for puffin only.

As detailed in Section 4.3, for kittiwake, guillemot and razorbill a preliminary, approximate approach to estimating mink accessibility for each of the target Objective A SPAs has been proposed. This approach involves using photographs of the cliffs from key locations within the SPA and marking areas as either red = no, low or uncertain accessibility to mink; green = high likelihood of accessibility to mink and no colour = no breeding seabirds present. The percentage of the green areas have then been estimated to give an approximate proxy for mink accessibility for the entire coastal breeding extent for each SPA. It is noted in Paragraph 67 (Section 4.3) that it is intended for this information to be used to inform the compensation capacity calculations, with a key focus on reaching consensus regarding the extent of colony accessibility to mink. However, it is not fully clear how this will be built into the calculation as currently presented in Figure 4.3 and we advise further discussion will be required with the Applicants prior to submission of the CIMP if consent is granted.

Although, we do not agree with the percentage accessibility values derived for each Objective A SPA by the Applicants (Paragraph 70) - which we feel have been over-estimated in the Mink Accessibility Site Visits Summary Note (8 August 2025). We do agree with this as a method for estimating mink accessibility in principle and advise that this should be incorporated within the calculations for the CIMP rather than the assumption of 100% mink accessibility or use of minimum accessibility values.

Detailed advice on the Mink Accessibility Site Visits Summary Note has been drafted, which contains further information in relation to accessibility values, including additional work required and will be shared with the Applicants shortly.

We advise that the proposed red/green approach should be used to help inform mink accessibility at each of the Objective A SPAs. Percentages should be agreed, prior to submission of the CIMP if consent is granted.

B.3.1.2 Mink density

In relation to mink density, we previously raised concerns (21 May 2025) that the proposed mink density was not based on data relevant to seabird cliffs. Other coastal habitat types, including low-lying coastal areas have been used as the closest proxy. In our advice of 21 May, we noted that of the five mink densities used to calculate a mean coastal density, two are from Scotland and three are from outwith the UK. While using all examples from Scotland would be preferable, we accept that the options are limited and that the mean of the two Scottish examples is similar to the mean of the five studies combined. Having reviewed the sources for these studies we note:

- A number of issues have been identified with the densities reported in Table 4.1, which have been taken directly from the CABI International (2022) digital library data sheet on American mink. We note that the previous Moore *et al*. 2003 error has been corrected but it isn't clear whether further verification was undertaken by the Applicant on the other values?
- We were not able to validate the information contained within the Dunstone and Birks papers (1983 and 1985). Birks and Dunstone, 1991 is not the primary source for either of the proposed values. Dunstone and Birks 1983, which is not referenced, may be the true primary source of the 1.88 mink per kilometre density value. However, we were unable to source this paper and request a copy is provided for review. The 2 mink per kilometre value appears to be sourced from Birks and Dunstone, 1991 but it is not clear if this is a maximum density value taken from 1985 or whether this value is rounding up the 1.88 mink per kilometre from the 1983 paper. In either case, we advise that the 2 mink per kilometre may not be appropriate to use to derive a mink density estimate.
- The study undertaken by Previtali *et al* (1998) was in freshwater habitat and so may not be relevant to use to derive a marine coastal mink density value.
- The studies referenced use a variety of methods to calculate mink density (i.e. measurement of territory / home range size (sex specific) versus number of mink trapped in a known distance) which may impact the results of the studies. Densities measured from trapping will include non-territory holding mink, and there is evidence to suggest that trapping success depends on the sex of the mink. It is therefore important to note these caveats to all of the density estimates used.

Despite the above, having sought expert advice and noting that the proposed Analyses of North Scotland Mink Data by the University of Aberdeen will help with improving the knowledge of mink distribution and density, which if required could be used to refine mink densities for the CIMP. We are broadly content with the proposed mink density value subject to minor amendment based the comments above.

We are broadly content with the proposed mink density, subject to minor amendment for the CIMP based on our comments above, if consent is granted.

B.3.1.3 Mink predation rate

In our previous advice (21 May 2025), we raised concerns over the assumption that 200 chicks per mink per season will be protected by the measure, which we didn't feel was based on adequate evidence. It is noted in Paragraph 88, Section 4.4 that there are several examples of mink predation on seabirds where the impact has been quantified, with a specified number of mink predated within a specified time period. It then goes on to list a number of ad hoc observations of mink predation / mink den discoveries. There are also examples provided of the extent of mink predation on seabirds presented as percentages of survival rate / colony size referenced. These examples are helpful to consider; however, we note that the predation rates in all of these examples are very variable, relate to various bird species, are from various countries and are largely ad hoc or anecdotal reports rather than specific studies on predation rates.

The key reference that appears to be used to predominantly inform the mink predation rate is the T. Björnsson pers. comm. in Clode and Macdonald, 2002. This is an anecdotal, one-off predation event and it is unclear whether the level of predation is typical of the impact a mink might have on a cliff-nesting seabird colony in Scotland. In addition, it does not specify the habitat type in which the guillemot were predated so we cannot determine whether it was similar to the cliff-nesting habitats of guillemot in Scotland.

During the July site visit and as noted in Paragraph 73 (Section 4.3), the Applicants have clarified that the 200 chicks per mink per season value does not just represent direct predation but incorporates indirect mortality to seabirds as a result of mink-induced sublethal effects. The sublethal effects include impacts such as:

- Injury due to mink attack;
- Injury sustained in avoidance of mink attack and/or colony panic;
- Disturbance from nests, reducing egg incubation and protection of eggs and/or chicks;
- Disturbance increasing energy expenditure;
- Disturbance reducing foraging opportunity;
- Destruction of nests by mink and/or avoidance of mink attack and/or colony panic;
- Nest site quality trade-off against mink predation avoidance; and
- Colony abandonment.

Having considered this in detail, including as part of our expert elicitation, we accept in the absence of empirical evidence, and with the inclusion of indirect mortality due to mink-induced sublethal effects, that 200 chicks per mink per season is reasonably defensible and as such accept its use in the calculation (Figure 4.3).

We advise that we accept a predation rate of 200 chicks per mink per season.

B.3.1.4 Coastal breeding extent

As noted from Paragraph 94, Section 4.4 to calculate the impact of mink predation on seabirds, it is necessary to estimate the number of mink within each SPA. To do this, the coastal breeding extent of the impacted (target) bird species at each SPA must be determined. It is noted that the Applicants used a GIS system such that for each SPA and target species (guillemot, kittiwake, puffin and razorbill) coordinates for where these species were recorded breeding were plotted as

identified by the Seabirds Count dataset. The data points within each SPA (including those data points within 0.1 km of the SPA boundary) were then connected consecutively with straight lines. The length of coastal breeding extent was then multiplied by the mink density value to provide an estimated number of mink within each SPA. We are content with the calculation in principle for estimating the number of mink present within each SPA. However, we undertook a check of the coastal breeding extent of the Objective A SPAs and note our values for Troup, Pennan and Lion's Heads SPA and Fowlsheugh SPA were similar to that of the Applicants. Our coastal breeding extent measurement for Buchan Ness to Collieston Coast SPA was considerably less than presented by the Applicants. Observing:

- The coordinates available in the Seabirds Count database are presented as start grid reference, end grid reference, and the latitude and longitude of the section start (but not always the section end). It would be useful if clarity could be provided as to whether both the start and end coordinates were used or if only the start coordinates were used.
- The West Quarry Head section of Troup, Pennan and Lion's Heads SPA only had 1 kittiwake and 3 razorbill (no guillemot or puffin were recorded in this section). As such, we advise that this section should be omitted as its inclusion would result in an overestimate of the number of mink at the SPA and therefore an overestimate of the number of chicks protected.
- Additionally, Buchan Ness to Collieston Coast SPA is complicated as the count data for this site is presented as the master site only in the Seabirds Count database. The Seabird 2000 master site 'Boddam to Collieston' is equivalent to the Buchan Ness to Collieston Coast SPA master site in Seabirds Count and has the start and end coordinates of survey sections within this SPA.
- If the coastal breeding extent of this site were to be measured as described then it would need to be measured between the start and end grid reference points, resulting in a distance of approximately 16 km. However, the distance measured for this SPA as presented in Table 4.2 is 27.58 km. Therefore, further detail as to how coastal breeding extent was measured for this SPA will be required.

Additionally, we have access to raw seabird count data collected for the Buchan Ness to Collieston Coast SPA in 2025. In this data, the SPA is counted in sections and large sections of this SPA do not have significant numbers of the target seabirds (auks and kittiwakes). If the straight-line length of each section is measured and summed, the coastal breeding extent would be 16.8 km if all sections are included. Three sections (Boddam to Inch More, Cruden Bay South and Fawn Port to Old Slains) had no auks or kittiwakes. The count data from Seabirds 2000 also shows limited presence of auks and kittiwakes within these three sections, with only a single puffin recorded in 'Fawn Port to Old Slains'. These results suggest that these three sections are historically unlikely to be significant breeding locations for auks and kittiwakes. Therefore, we advise the coastline distance of these three sections should be omitted from the calculation, which would result in a total occupied distance of 12.09 km.

We are content with the calculation used to estimate the number of mink within each SPA in principle but advise that the length of coastline used for each SPA will require agreement prior to submission of the CIMP, if consent is granted.

B.3.1.5 Number of chicks protected

It states in Paragraph 98 (Section 4.4) that to calculate the number of specific seabird species chicks protected, the number of guillemot, kittiwake, puffin and razorbill within each SPA needs to be determined (using data from the Seabirds Count) and then this is used to calculate the proportion of each species within each SPA. It goes on to note that within the Seabirds Count data, kittiwake are counted as Apparently Occupied Nests (AON) and puffin are counted as Apparently Occupied Burrows (AOB). Therefore, kittiwake and puffin counts have been multiplied by two to generate the number of individuals. Guillemot and razorbill are counted as Individuals (IND) within the Seabirds Count data so have been used as given.

The total number of birds of all species (not just the species requiring compensation) have then been added together, taking into account whether a species is counted as an AON/AOB or an IND using the above method. The number of each guillemot, kittiwake, puffin and razorbill were then separately divided by the total number of birds within the SPA to determine the proportion of the SPA that are guillemot, kittiwake, puffin and razorbill.

To calculate the number of specific seabird species chicks protected by mink control, the proportions for each species are then individually multiplied by the total number of chicks protected. The number of specific seabird species chicks protected is then divided by the number of chicks required to be protected from mink predation to recruit one breeding adult of the species into the meta-population. This is detailed in Paragraph 105 as being 2.96 for guillemot, 2.03 for kittiwake, 4.58 for puffin and 3.51 for razorbill.

In relation to the species data from Seabirds Count, it is noted that for kittiwake and puffin, the AON and AOB are multiplied by two to convert to breeding adult individuals. However, guillemot and razorbill IND are treated as though one IND equals one breeding individual. For guillemot, one IND = 1.49 breeding adult individuals and for razorbill, one IND = 1.34 breeding adult individuals as detailed in Seabirds Count. It should also be noted that if there are any IND or SEA counts for puffin, these should be treated as equivalent to 1 AOB unless the count was before 1 May, in which case 1 AOB = 1 IND/1.5.

Therefore, we can advise at this stage that we accept the calculation method in principle, but further refinement of this approach is required for the CIMP, including a better understanding of the proportional approach taken, including the implications of including all species, not just the target species.

We are content with the method proposed for calculating the number of chicks to be protected by the measure in principle, but further refinement and clarification is required prior to submission of the CIMP, if consented is granted.

B.3.1.6 Minimum percentage accessibility

In the absence of an agreed mink accessibility value for each Objective A SPA, which once agreed we advise should be used in the CIMP rather than relying on the assumption of 100% mink accessibility (as initially proposed by the Applicants). It has been useful to consider the use of minimum percentage accessibility values as presented by the Applicants in Section 5, which demonstrates that 100% accessibility by mink to deliver the compensation requirements for kittiwake, guillemot and razorbill (subject to finalisation of the Appropriate Assessment) is not necessary.

Table 5.1 extracted below details the number of kittiwake, guillemot, razorbill and puffin requiring compensation as a result of the predicted impacts (using the NatureScot approach as the worst-case scenario) from Salamander and Ossian separately and together.

Table 5.1: Relevant Impacts Potentially Requiring Compensation for guillemot, Kittiwake, Puffin, And Razorbill, Using the NatureScot Approach (Higher) as the Worst Case Scenario

Species	Ossian Adult Annual Mortality (Number of Animals) (Worst Case Scenario)	Salamander Adult Annual Mortality (Number of Animals) (Worst Case Scenario)	Ossian and Salamander Combined Adult Annual Mortality (Number of Animals) (Worst Case Scenario)
Kittiwake	37.9	34.7	72.6
Guillemot	666.9	191.0	857.9
Razorbill	8.0	4.7	12.7
Puffin	11.5	3.8	15.3

For both projects the impacts predicted result in adult annual mortality of 72.6 kittiwake, 857.9 guillemot, 12.7 razorbill and 15.3 puffin.

Table 5.4 extracted below details the number of birds potentially compensated by the proposed measure along a sliding scale of mink accessibility for both projects.

Table 5.4: Number of Birds Compensated by Mink Control Compensation Measure Along a Sliding Scale of Mink Colony Accessibility for Ossian and Salamander under Objective A

Percentage Colony Accessibility (%)	Objective A Number of Birds Compensated by Mink Control Compensation Measure			
	Kittiwake	Guillemot	Razorbill	Puffin*
10	220.32	235.64	34.05	1.16
20	440.64	471.28	68.11	2.31
30	660.96	706.92	102.16	3.47
40	881.28	942.56	136.22	4.62
50	1101.60	1178.20	170.27	5.78
60	1321.92	1413.84	204.32	6.94
70	1542.24	1649.48	238.38	8.09
80	1762.56	1885.12	272.43	9.25
90	1982.88	2120.76	306.49	10.40
100	2203.20	2356.40	340.54	11.56

For kittiwake and razorbill, using this method, the mink accessibility requirement is below 10 % and for guillemot it is 36.41 %[21]. The value for guillemot is higher than for the other species (except puffin) and we advise is likely to be met by the Objective A SPAs. However, as above we recommend that the proposed red/green approach to calculating mink accessibility at each of the Objective A SPAs is undertaken for the CIMP, if consent is granted.

Technically, for puffin, the compensation requirements needed for both projects exceeds the benefit derived from Objective A SPAs by a deficit of 3.74 birds. It is noted in Section 2.1.1 that there are multiple levels of precaution within the capacity calculations as well as non-SPA puffin present within the SISI MCP. These puffins will be protected by the measure but are not included in the calculations. Therefore, as a result we are content that the compensation requirement for

[21] Paragraph 146 states a total percentage of 36.41% for guillemot, razorbill and kittiwake needs to be accessible by mink to meet the combined Ossian and Salamander compensation requirements. However, using values in Tables 5.2 and 5.3, we conclude that 36.41% requires to be accessible for guillemot alone.

puffin is likely to be met by the Objective A SPAs, noting that Objective B SPAs allow further scope for additional puffin if required.

Taking the above information into account, we are content that Objective A SPAs are likely to provide sufficient compensation for kittiwake, razorbill, guillemot and puffin for Salamander and Ossian, noting that accessibility calculations will require refinement for the CIMP, should consent for Ossian be granted.

B.3.1.7 Objective B SPAs (adaptive management)

As noted in Section 5.3, the Objective B SPAs have been identified to be implemented if required as adaptive management. Table 5.5 shows the number of adult birds potentially compensated by the measure, if the SISI MCP was extended to the Objective B SPAs. It is helpful to see what level of compensation may be provided at these SPAs and points to the potential for further collaboration with other projects. However, we would expect further site-specific information as per the Objective A SPAs if adaptive management is required or additional collaboration was proposed.

B.3.2 Gannet bycatch reduction

This proposed compensation measure involves reduction in the mortality of gannets caught as bycatch in Portuguese waters through the use of bycatch reduction techniques. This measure would be implemented in partnership with the Portuguese Society for the Study of Birds (SPEA).

We advised in response to the original Application (20 September 2024) that further analysis was required to validate likely connectivity between gannets breeding in Scottish SPA colonies and those caught in bycatch during the non-breeding season in Portuguese waters.

It is noted in Paragraph 175, Section 7.2 that SPEA will undertake initial bycatch monitoring and mitigation trials in 2025, and this will continue throughout 2026. The outputs of this will be available at the end of 2026 and will be used to inform the CIMP, which we support.

In relation to connectivity, it is noted in Paragraph 182, Section 7.2.2 that SPEA in collaboration with the Centre of Ecology, Evolution and Environmental Changes (Ce3C) will analyse bycaught gannets using stable isotope analysis and genome mapping. The scope of work is detailed in Section 7.4 and states that two methods will be used to tentatively assign a colony of origin to the gannets annually killed in Portuguese fishing operations:

1. Population genomics based on partial or whole genome sequencing; and
2. Stable isotope analysis based on tissue samples grown on breeding grounds.

The approach is considered and likely to provide valuable information required to evaluate connectivity with Scottish SPAs.

Advanced results are expected in Q1 2026 and a final report with detailed results and analyses in Q4 2026. Therefore, further discussions will be required on this measure if this proposal is consented and we advise that the final CIMP should be agreed prior to operation of the wind farm.

We are content, subject to the results of the proposed studies, that the proposed measure should provide compensation for gannet for Salamander and Ossian, if Ossian is consented, noting that further detail will be required for the CIMP.

Northern Lighthouse Board

From:	Redacted on behalf of navigation
To:	MD Marine Renewables
Cc:	Redacted ; Redacted
Subject:	RE: [EXT] 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025
Date:	20 October 2025 15:23:56
Attachments:	image001.png

Good afternoon,

NLB have no comment to provide on the Additional Information provided in relation to the Ossian OWF.

Regards

Adam

Adam Lewis
Coastal Inspector
Northern Lighthouse Board

T: Redacted
M: Redacted
E: Redacted

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 16 October 2025 12:08
To: MD.MarineRenewables@gov.scot
Cc: Redacted ; Redacted
Subject: [EXT] 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited (“the Applicant”) submitted an application to the Scottish Ministers, in accordance with the above legislation,

to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

- Cover Letter
- Introduction
- Addendum to Chapter 7: Physical Processes
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government

Scottish Government
Riaghaltas na h-Alba

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Natural England

Date:
Our ref: 530691
Your ref: 00010861/00010862

Licensing Operations Team
Marine Directorate
Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

Tyneside House,
Skinnerburn Road,
Newcastle-upon-Tyne,
NE4 7RA

0300 – 060 3900

Via email only

Dear Iain

00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Location: Approximately 80Km South East of Aberdeen.

Thank you for seeking our advice on the additional information provided by Ossian Offshore Wind Farm Limited in support of their Section 36 Application to construct and operate the Ossian Offshore Wind Farm (OWF), in your consultation which we received on 16 November 2025.

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE (SCOTLAND) ACT 2010
The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). As the application is located outside English territorial waters then the advice from NatureScot, the statutory nature conservation body in offshore Scottish waters should be sought.

Due to our remit, our advice on this consultation is restricted to species within England and to protected species from English designated sites which may be impacted by the proposed wind farm.

We provide our advice based on the following documents:

- Cover Letter
- Introduction
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report

- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

Summary of advice

- Natural England is satisfied that shortest edge-to-edge distances and appropriate foraging ranges have been adopted, consistent with Natural England and NatureScot advice.
- Natural England's previous advice on ornithology assessment methods still stands, where they relate to species from English designated sites.
- Natural England requests the provision of updated 'project alone' impact assessments in line with our guidance for specified English site/feature combinations where adverse effects cannot be excluded.
- Natural England note that the requested information could be provided as an advice note separate to Ossian Offshore Windfarm's Section 36 application.

Detailed Advice

Natural England welcomes the provision of additional information provided by Ossian Offshore Wind Farm (OWF) Limited relating to their ornithology assessments. We are satisfied that the Applicant has adopted the use of shortest distances between array area and Special Protection Area (SPA) boundaries based on edge-to-edge distances and has adopted the use of foraging ranges in line with Woodward et al (2019), in line with our own and NatureScot's advice.

Natural England has previously provided advice on ornithology assessments submitted by the Applicant in response to consultation on their original Section 36 Application (Letter dated: 24th September 2024, NE Ref:481920) and, directly to the Applicant in response to an email query (sent 10th June 2025, NE Ref:510213) referred to in Table 2.1, page 5 of the Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites document provided. In response to this current consultation, we must maintain that, as the statutory nature conservation body within English territorial waters our previous advice still stands as it relates to species from English designated sites.

In our previous advice Natural England highlighted key differences between NatureScot's guidance on ornithological impact assessments and that provided by Natural England. Crucially, the application of Biologically Defined Minimum Population Sizes (BDMPS), and the use of stable-age structures and sabbatical rates in apportioning conflict with our best practice advice, leading to considerable changes in predicted levels of impact. To enable Natural England to provide effective advice to the Marine Directorate and other decision-making Relevant Authorities we require outputs from assessments undertaken using our prescribed methodologies where impacts to English designated sites may be apparent.

Our previous advice noted that Natural England do not expect Applicants to undertake a separate impact assessment for all sites and features based on our advice. This remains our general position; however, it is likely that decision-makers will be seeking Natural England's views on the likely level of impact to English site features from Scottish OWF projects where an appropriate assessment or our advice has identified adverse effects, or is unable to rule them out. Principally, this is to inform the appropriate scaling of compensatory measures, but also to ensure parity of treatment compared to projects in English waters affecting the same features.

In this instance therefore, and without prejudice to any future appropriate assessment or our advice on it, Natural England requests the provision of updated 'project alone' impact assessments applying

methodologies and parameters appropriate to our guidance to the data held by the applicant, for the following English site/feature combinations:

- Farne Islands SPA guillemot
- Relevant Farne Islands SPA seabird assemblage components (kittiwake, razorbill, puffin)
- Flamborough and Filey Coast SPA kittiwake, guillemot and razorbill
- Flamborough and Filey Coast SPA seabird assemblage component (puffin)[1]

This same request was provided in our letter to the Applicant following their email query.

It would therefore be beneficial if an additional advice note could be provided which follows Natural England's approach. This could be separate to Ossian Offshore Windfarm's application but would provide Natural England the parity of data we require when considering impacts from Ossian OWF on English designated sites in combination with other plans or projects.

A similar request regarding a specific site/feature combination was made by Natural England to Berwick Bank OWF (via email on 25th June 2022), which resulted in the provision of an advice note to address Natural England concerns (Document Ref: HC0063_BerwickBank).

Natural England would be pleased to engage the Applicant through our Discretionary Advice Service regarding the delivery of impact assessments for the above site/feature combinations that satisfy Natural England's advice and guidance[2], to ensure that an acceptable quantification of impacts to key features of concern from English designated sites is produced.

Other Relevant Matters

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

For any queries relating to the content of this letter please contact me using the details provided below. To provide the further information requested in this advice and for subsequent consultations, please email consultations@naturalengland.org.uk

Yours sincerely

Pete Welby

Higher Officer
Northumbria Marine Team
Email: Redacted

[1] Puffin appears to have been screened out of the assessment as it is not a 'named component' of the FFC SPA seabird assemblage. However, we advise that the best available evidence suggests that their numbers are very likely to exceed 2,000 individuals (10% of the minimum qualifying assemblage of 20,000 individuals). As such, puffin should be considered a 'named component' of the FFC SPA seabird assemblage and assessed accordingly.

[2] Guidance on Environmental Considerations for Offshore Wind and Cable Projects

Northumberland County Council

Northumberland
County Council

Iain MacDonald
The Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

Planning Ref: 25/03752/CNA
Your Ref:
Contact: Claire Simm
Direct Line: Redacted
E-Mail: Redacted
Date: 27th October 2025

Dear Sir/Madam,

TOWN & COUNTRY PLANNING ACT 1990
Town and Country Planning (Development Management Procedure) (England) Order 2015

Proposal Reference: 00010861 / 00010862. APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM

Location APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN

Applicant Iain MacDonald The Scottish Government

I would confirm that Development Management have **No Objection** to the above consultation.

Yours Faithfully

Claire Simm
Planning Officer

Royal Society for the Protection of Birds Scotland

Iain MacDonald
Consenting and Licensing Casework Manager
Licensing Operations Team – Marine Directorate
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Sent by email only: MS.MarineRenewables@gov.scot

8th January 2026

Dear Iain

APPLICATION (ADDITIONAL ENVIRONMENTAL INFORMATION) FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN

Thank you for consulting RSPB Scotland on Additional Environmental Information (AEI) submitted in relation to the above application. We also appreciate you agreeing to an extension of time in which to submit our response.

We previously submitted a response to the Application in a letter dated 19 September 2024, objecting to the proposal due to adverse impacts on a number of SPAs and inadequate assessment. While the AEI addresses some of our concerns around the assessment, we are still maintaining our position with regard to in-combination impacts.

RSPB Scotland recognises that climate change is the greatest long-term threat to nature, and we support the transition to renewable energy. We support the principle of offshore wind and recognise the part it can play in tacking the climate crisis; however, this must be done in a way which does not have unacceptable impacts on nature.

RSPB Scotland does not object to the proposed development in isolation and this would be a preferable location for such a windfarm. However, as previous decisions have been taken to consent extremely damaging proposals, particularly Berwick Bank windfarm, this proposal must be considered in combination with the impacts already predicted from these schemes.

We would be happy to review our position on Ossian should the Berwick Bank project not progress. Whilst impacts on nature from Ossian are not insignificant, Ossian would offer a far less nature-destructive way of generating essential low carbon energy than Berwick Bank, and we hope Ossian is ultimately able to progress in its place.

Habitat Regulations

Due to the nature and location of the development, it would have likely significant effects on a number of Special Protection Areas (SPAs) designated for internationally important seabird populations. Subsequently the competent authority must carry out an appropriate assessment under The Conservation of Offshore Marine Habitats and Species Regulations 2017 (the "Habitat Regulations"). In the light of the conclusions of the Appropriate Assessment, the competent authority shall agree to the project only after having ascertained that it will not adversely affect the integrity of the SPA, alone or in combination with other plans or projects.

Only if the competent authority is satisfied that there being no alternative solutions, and the plan or project must be carried out for imperative reasons of overriding public interest, they may agree to the plan or project notwithstanding a negative assessment of the implications for the European site. In the event of the no alternative solutions and imperative reasons of overriding public interest tests being satisfied, the competent authority must secure any necessary compensatory measures are taken to ensure that the overall coherence of the UK Site Network is protected.

We note that the Application site is identified as a suitable site for development in the Sectoral Marine Plan for Offshore Wind Energy. It is nonetheless clear that the Scottish Government, as competent authority, must still ensure the requirements of Regulations 29 and 6 of the Offshore Habitats Regulations[1] are adhered to before it can decide to grant consent for the proposed development.

Detailed Comments on Ossian Windfarm

RSPB Scotland welcome the Additional Environmental Information submitted and that the details provided bring the assessment into alignment with the methodological guidance provided by NatureScot. RSPB Scotland notes the Applicant's recognition that Adverse Effects on Site Integrity (AEoSI) cannot be ruled out for Guillemot, as a qualifying feature of Troup, Pennan and Lion's Head SPA. In addition, the Applicant recognises potential AEoSI for four species that are features of eight SPAs, arising from the project in combination with other North Sea wind farms.

The Applicant has concluded potential AEoSI for the Guillemot population of the Troup, Pennan and Lion's Head SPA. We welcome the degree of precaution applied by the Applicant to this conclusion and having considered the range of the counterfactuals and the location of the wind farm at the far end of potential foraging distances, we are less concerned about the potential implications for this population.

However, the Applicant has only presented the in-combination impacts of the proposed development assuming the impacts arising from Berwick Bank offshore wind farm can be compensated for. As there is no mechanism currently in place for delivering any compensation measures for Berwick Bank, RSPB Scotland does not agree that the severe impacts arising from Berwick Bank can simply be discounted. Furthermore, three developments (Ossian, Muir Mhòr and Caledonia) have submitted Additional Information

[1] https://www.legislation.gov.uk/uksi/2017/1013/contents

within a similar timeframe to each other. All three have submitted revised ornithology assessments within these AEIs. Therefore, much information in the in-combination assessment is now out of date. Notwithstanding these issues, the 'in-combination' impacts of the Proposed Development are clearly not acceptable and we conclude AEoSI, in combination with other projects, in relation to the following designated sites and species:

Impacts arising through mortality from collision and distributional change on the Black-legged Kittiwake populations of the following SPAs:

- Buchan Ness to Collieston Coast SPA
- East Caithness Cliffs SPA
- Forth Islands SPA
- Flamborough and Filey Coast SPA
- Fowlsheugh SPA
- North Caithness Cliffs SPA
- St. Abbs to Fast Castle SPA
- Troup, Pennan and Lion's Head SPA

Impacts arising through mortality from distributional change on the Razorbill population of the following SPA:

- Forth Islands SPA

Impacts arising through mortality from distributional change on the Guillemot population of the following SPAs:

- Forth Islands SPA
- Troup Pennan and Lion's Head

Impacts arising through mortality from distributional change on the Guillemot and Razorbill components of the Seabird Assemblage of the following SPAs:

- Fowlsheugh SPA
- St. Abbs to Fast Castle

Impacts arising through mortality from collision and distributional change on the Kittiwake, Guillemot and Razorbill features of the Outer Firth of Forth and St. Andrews Bay Complex SPA, due to functional linkage with the above SPA breeding colonies.

Based on the previous assessment, (dated 19/09/2024), RSPB Scotland maintain their conclusion of AEoSI in combination with other developments for the following sites, species and adverse impacts

Impacts arising through mortality from collision and distributional change on the Black-legged Kittiwake populations of the following SPAs:

- Farne Islands SPA
- Flamborough and Filey Coast SPA

Impacts arising through mortality from distributional change on the Guillemot population of the following SPA:

- Farne Islands SPA

Impacts arising through mortality from distributional change on the Razorbill population of the following SPA:

- Fowlsheugh SPA

Impacts arising through mortality from distributional change on the Puffin population of the following SPA:

- Forth Islands SPA

Impacts arising through mortality from collision and distributional change on the Northern Gannet population of the following SPAs:

- Flamborough and Filey Coast SPA
- Forth Islands SPA
- Outer Firth of Forth and St. Andrews Bay Complex SPA

Compensation has been calculated on a 'without prejudice' basis on Guillemot based upon impacts arising from the project alone and in combination with other projects for Common Guillemot at the following SPAs:

- Buchan Ness to Collieston Coast SPA
- Farne Islands SPA
- Forth Islands SPA
- Fowlsheugh SPA
- St. Abb's Head to Fast Castle SPA
- Troup, Pennan and Lion's Head SPA

While the impacts above are significant, when Berwick Bank (as per the original assessment) is included the predicted impacts of the project in-combination with other North Sea developments for a number of SPAs are severe. For example, after the 35 year lifetime of the Application the Kittiwake population of the St. Abbs to Fast Castle SPA is predicted to be between **18.0 and 35.4%** of what it would be in the absence of the developments and the Gannet population of the Flamborough and Filey Coast SPA is predicted to be between **44.5 and 56.1%** of what it would have been in the absence of the developments. These impacts are additional to existing population declines and pressures such as Highly Pathogenic Avian Influenza (HPAI). Without exception, the impacts would add significant pressure to SPA species already struggling and, in the case of Kittiwake and Puffin, already vulnerable to global extinction.

We provide more detail within Annex 1 below. This is in response to the Additional Environmental Information only and so should be read in conjunction with our previous response (attached).

<u>Compensation</u>

If the Scottish Government accepts the developer's case that there are no alternative solutions to the Proposed Development and determines that the development can be consented for Imperative Reasons of Overriding Public Interest, it is vital the Scottish Government undertakes the most rigorous assessment of the suitability and efficacy of the compensation measures proposed. In addition, it must secure the rigorous application of any agreed compensation to ensure the overall coherence of the UK Sites Network.

RSPB Scotland acknowledges the proposed compensation put forward by the Applicant and we have been engaging in discussions on them. We raised concern relating to two key proposed measures in our previous letter:

i. Mink Control
ii. Seabird Bycatch Reduction

Commentary on, and analysis of these proposed compensation measures that formed part of our original response is attached. In summary, RSPB Scotland's position was that we were not persuaded that these compensation measures are appropriate or sufficient as currently proposed. We had several concerns about the proposed Mink Control measure. However, additional work and commentary have been included in the AEI Derogation Case Addendum indicating the likely level of occupation by mink of the SPAs that are (on a without prejudice basis) impacted and the likely potential for compensation at those sites based upon a programme of mink eradication, though further work would need to be carried out to establish greater certainty of the measures.

Based on our assessment of the evidence presented, we also highlighted in our original response that compensation measures are required for Guillemot and Puffin in addition to other species. The derogation case now takes this into account albeit on a 'without prejudice' basis.

Concerns reman relating to bycatch measures for Gannet in Portuguese waters. However, we understand that further work is ongoing to understand potential linkages between those waters and the SPAs that host Gannet in Scotland. We also understand that some discussions have been had with the Scottish fishing industry regarding this form of compensation and we would support those being taken further and prioritised over measures in Portuguese waters.

Regarding compensation, we would direct the Applicant towards the forthcoming Scottish Government strategic compensation library of measures as we believe that this approach will offer the most effective suite of measures and benefits. However, if required, on this this particular project, where capacity allows we will continue to engage in ongoing dialogue with the Applicant, the Marine Directorate and NatureScot with a view to shaping and improving proposed compensation measures to ensure that they are as effective as required, are as close as possible to the affected colonies and ensure the coherence the UK Sites Network.

<u>Summary</u>

RSPB Scotland does not object to the Application in isolation. However, due to significant and unacceptable impacts resulting from the recently approved Berwick Bank windfarm, for which we believe it is not possible to find an adequate degree of compensation, the in- combination effects of the Proposed Development would also be unacceptable and we therefore are in a position where we have to object to the in-combination impacts of the Proposed Development.

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

Yours sincerely

Redacted

Andrew Tait
Senior Conservation Planner, RSPB Scotland

Annex: Summary of significant impacts, in combination with other offshore wind farms Excluding Berwick Bank

Black-legged Kittiwake

Within the range of likely mortalities derived using the methods advocated by NatureScot and RSPB Scotland during scoping, the impacts arising from distributional change and collision mortality associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms, excluding Berwick Bank offshore wind farm, are predicted to result in the annual population growth rate of Kittiwake at the **Buchan Ness to Collieston Coast SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.996 and 0.997. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **86.8 and 88.2%** of what it would have been in the absence of the development.

Within the range of likely mortalities derived using the methods advocated by NatureScot and RSPB Scotland during scoping, the impacts arising from distributional change and collision mortality associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms, excluding Berwick Bank offshore wind farm, are predicted to result in the annual population growth rate of Kittiwake at the **East Caithness Cliffs SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.991 and 0.993. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **71.7 and 79.0%** of what it would have been in the absence of the development.

Within the range of likely mortalities derived using the methods advocated by NatureScot and RSPB Scotland during scoping, the impacts arising from distributional change and collision mortality associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms, excluding Berwick Bank offshore wind farm, are predicted to result in the annual population growth rate of Kittiwake at the **Flamborough and Filey Coast SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.993 and 0.994. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **78 and 79.7%** of what it would have been in the absence of the development.

Within the range of likely mortalities derived using the methods advocated by NatureScot and RSPB Scotland during scoping, the impacts arising from distributional change and collision mortality associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms, excluding Berwick Bank offshore wind farm, are predicted to result in the annual population growth rate of Kittiwake at the **Forth Islands SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.994 and 0.996. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **79.4 and 85.7%** of what it would have been in the absence of the development.

Within the range of likely mortalities derived using the methods advocated by NatureScot and RSPB Scotland during scoping, the impacts arising from distributional change and collision mortality associated with Ossian Offshore Wind Farm in

combination with other North Sea wind farms, excluding Berwick Bank offshore wind farm, are predicted to result in the annual population growth rate of Kittiwake at the **Fowlsheugh SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.994 and 0.996. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **81.8 and 86.6%** of what it would have been in the absence of the development.

Within the range of likely mortalities derived using the methods advocated by NatureScot and RSPB Scotland during scoping, the impacts arising from distributional change and collision mortality associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms, excluding Berwick Bank offshore wind farm, are predicted to result in the annual population growth rate of Kittiwake at the **North Caithness Cliffs SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.993 and 0.995. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **78.9 and 83.0%** of what it would have been in the absence of the development.

Within the range of likely mortalities derived using the methods advocated by NatureScot and RSPB Scotland during scoping, the impacts arising from distributional change and collision mortality associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms, excluding Berwick Bank offshore wind farm, are predicted to result in the annual population growth rate of Kittiwake at the **St. Abbs Head and Fast Castle SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.996 and 0.997. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **86.7 and 91%** of what it would have been in the absence of the development.

Guillemot

Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms, excluding Berwick Bank offshore wind farm, are predicted to result in the annual population growth rate of Guillemot at the **Forth Islands SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.991 and 0.998. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **72 and 93.1%** of what it would have been in the absence of the development.

Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms, *including Berwick Bank,* are predicted to result in the annual population growth rate of Guillemot at the **Troup, Pennan and Lion's Head SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.996 and 0.999. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **86.6 and 96.6%** of what it would have been in the absence of the development.

Razorbill

Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms, excluding Berwick Bank offshore wind farm, are predicted to result in the annual population growth rate of Razorbill at the **Forth Islands SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.989 and 0.998. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **67.4 and 92.8%** of what it would have been in the absence of the development.

Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change associated with Ossian Offshore Wind Farm in combination with other North Sea wind farms are predicted to result in the annual population growth rate of Razorbill at the **Fowlsheugh SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.995 and 0.999. This means that after the 35-year lifetime of Ossian Offshore Wind Farm, the population size of the SPA is expected to be between **82.6 and 96.3%** of what it would have been in the absence of the development.

Royal Yachting Association

From:	Redacted
To:	MD Marine Renewables
Subject:	RE: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025
Date:	17 October 2025 13:40:30
Attachments:	image002.png image003.png

Hi Iain,

I write to inform you that RYA Scotland has no comment that they wish to make on this consultation.

Kind Regards

Pauline

Pauline McGrow
Business Support Lead

Royal Yachting Association Scotland
T: Redacted
E: Redacted

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 16 October 2025 12:08
To: MD.MarineRenewables@gov.scot
Cc: Redacted Redacted
Subject: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited ("the Applicant") submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

- Cover Letter
- Introduction
- Addendum to Chapter 7: Physical Processes
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government

Scottish Government
Riaghaltas na h-Alba

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Scottish Water

Thursday, 23 October 2025

Marine Licensing
375 Victoria Road

Aberdeen

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

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

Follow Us

Dear Customer,

Ossian Offshore Wind Farm
Planning Ref: 23264
Our Ref: DSCAS-0113957-XRV
Proposal: Scoping Report - Ossian Offshore Wind Farm - South-east of Aberdeenshire Coast

Please quote our reference in all future correspondence

Scottish Water has no objection to this planning application. The applicant should be aware that this does not confirm that the proposed development can currently be serviced.

Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

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

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

Yours sincerely,

Angela Allison
Development Services Analyst
PlanningConsultations@scottishwater.co.uk

Scottish Water Disclaimer:

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

Supplementary Guidance

- Scottish Water asset plans can be obtained from our appointed asset plan providers:
    - Site Investigation Services (UK) Ltd
    - Tel: 0333 123 1223
    - Email: sw@sisplan.co.uk
    - www.sisplan.co.uk

Scottish Environmental Protection Agency

From:	Planning.North
To:	MD Marine Renewables
Cc:	Redacted
Subject:	PCS-20007032 SEPA Response to 00010861 / 00010862
Date:	20 November 2025 09:26:38
Attachments:	image.png

Dear Iain MacDonald,

Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
00010861 / 00010862
Construct and Operate the Ossian Offshore Wind Farm
Approximately 80KM South East of Aberdeen

Thank you for the above consultation. Based on the information provided, it appears that this application falls below the thresholds for which SEPA provide site specific advice. Please refer to our standing advice and other guidance which is available on our website.

In addition, please also refer to our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations available here.

If there is a significant site-specific issue, not addressed by our guidance or other information provided on our website, with which you would want our advice, then please reconsult us highlighting the issue in question and we will try our best to assist.

I trust these comments are of assistance - please do not hesitate to contact me if you require any further information.

Kind regards,
Barbara Olszowy
Planning Officer

sepa Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba
For the future of our environment

Avenue, Eurocentral, Holytown, North Lanarkshire, ML1 4WQ. Communications with SEPA may be monitored or recorded or released in order to secure the effective operation of the system and for other lawful purposes.

Dh’fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a’ phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk. Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhraid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1 4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghlèidheadh agus airson adhbharan laghail eile.

Scottish Fishermen’s Federation

From:	Redacted
To:	MD Marine Renewables
Cc:	Redacted Redacted Redacted
Subject:	Re: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025
Date:	02 December 2025 15:16:31
Attachments:	image001.png

Hi Iain,
Thank you for the opportunity to participate in the consultation for the 00010861 / 00010862 applications. After reviewing the materials provided, we have no comments or suggestions to offer at this time on the additional information provided.

I would appreciate confirmation of receipt of this email for our audit purposes.
Regards,
Oliwia

Oliwia Biros
Offshore Consents Assessments Manager

Scottish Fishermen's Federation
24 Rubislaw Terrace | Aberdeen | AB10 1XE
T: Redacted | M: Redacted
E: Redacted | sff.co.uk
Follow us: Facebook | Twitter

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 16 October 2025 12:08
To: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Cc: Redacted <Redacted Redacted <Redacted
Subject: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited ("the Applicant") submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

- Cover Letter
- Introduction
- Addendum to Chapter 7: Physical Processes
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,

Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Transport Scotland

From:	Redacted
To:	MD Marine Renewables
Cc:	Redacted Redacted Redacted
Subject:	EIA - Ossian Offshore Wind Farm – Additional Information Consultation – Transport Scotland Response - 26-Nov-25
Date:	26 November 2025 16:51:20
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png

FAO Iain MacDonald

Afternoon Iain,

Thank you for the opportunity for Transport Scotland to comment on the Additional Information (AI) submitted in support of the Ossian Offshore Wind Farm proposal.

Transport Scotland was consulted on both the Scoping Report and EIAR for this application, and we provided comment in a letter dated 6th April 2023 and email dated 3rd September 2024, respectively. In these, we noted that separate consents, licenses, and permissions for the Onshore (landward of MLWS) infrastructure of Ossian will be required and will be applied for by the Applicant, and that an Onshore EIA Report will support the onshore consent and license applications. Given the above, we confirmed that Transport Scotland had no comment to make on the Offshore supporting documents and had no objection to the proposed development.

As the AI is submitted in relation to the Offshore elements, I can confirm that Transport Scotland has no comment to make in this regard. As indicated previously, we will be pleased to review and comment on the Onshore elements as and when these become available.

Kind regards,

Iain

Development Management
Network Operations
Roads Delivery Directorate

transport.gov.scot

Transport Scotland, 177 Bothwell Street, Blythswood New Town, Glasgow, G2 7ER

Transport Scotland, the national transport agency
Còmhdhail Alba, buidheann nàiseanta na còmhdhail

Please see our privacy policy to find out why we collect personal information and how we use it

---

From: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Sent: 16 October 2025 12:08
To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Cc: Matt Bell Redacted Emma Lees <Redacted
Subject: 00010861 / 00010862 - Ossian Offshore Wind Farm Limited – Ossian Offshore

Wind Farm – Additional Information Consultation – Response Required by 2 December 2025

Dear Sir/Madam,

ELECTRICITY ACT 1989
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE AND COASTAL ACCESS ACT 2009
The Marine Works (Environmental Impact Assessment) Regulations 2007

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE OSSIAN OFFSHORE WIND FARM, APPROXIMATELY 80 KM SOUTH EAST OF ABERDEEN.

On 28 June 2024, Ossian Offshore Wind Farm Limited ("the Applicant") submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Ossian Offshore Wind Farm at a site off the coast of Aberdeen.

Further to the consultation on the applications and EIA Report issued on 12 July 2024, the Applicant has now submitted new documents and additional information as follows:

- Cover Letter
- Introduction
- Addendum to Chapter 7: Physical Processes
- Addendum to Chapter 11: Offshore Ornithology
- Addendum to Appendix 11.1: Offshore Ornithology Baseline Report
- Addendum to Appendix 11.3: Offshore Ornithology Displacement Report
- Addendum to Appendix 11.5: Offshore Ornithology EIA PVA Report
- Addendum to Part 3: Assessment of Special Protection Areas and Ramsar Sites
- Addendum to Appendix 3A: SPA Apportioning Technical Report and Annex A
- Addendum to Appendix 3B: SPA PVA Technical Report
- Derogation Case Addendum

In accordance with the EIA Regulations, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: https://marine.gov.scot/node/23264. The information provided in relation to the project including all other environmental topic assessments other than ornithology and physical processes remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 2 December 2025. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)