Morven South Offshore Wind Array Project

Environmental Impact Assessment Report

Volume 3, Annex 5.1: Consultation

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Prepared by:	Prepared for:
TTRPSEL	**Morven Offshore Wind Limited**

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Table 1.1: Consultation log outputs

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
Pre-scoping					
Offshore Ornithology meeting	11.08.2021	NatureScot Marine Directorate Licensing and Operations Team (MD-LOT) Marine Scotland Science (MSS) Royal Society for the Protection of Birds (RSPB) Scotland	Virtual meeting	A consultation meeting was held between the Applicant, NatureScot, the MD-LOT, MSS, and RSPB. The discussion focused on the approach to reviewing baseline data and the development of offshore survey scopes for offshore ornithology, understanding what the stakeholders would expect to see within the Scoping Report for the Morven Option Lease Agreement Site (hereafter 'the Morven Site Scoping Report'), and to present the methods and tools proposed to be used in the Environmental Impact Assessment (EIA) for stakeholder comment. • NatureScot advised that it was acceptable to wait for the survey reports to be completed up to August, as this timeframe would ensure that the data set adequately captured the full breeding season. This approach was considered appropriate for providing a comprehensive basis for subsequent assessment and decision-making.	This advice was noted and discussions have informed the Digital Aerial Survey (DAS) baseline surveys and the development of the baseline characterisation, as presented in the offshore ornithology annexes (Volume 3, Annex 11.1 to 11.6, including Appendices) and EIA chapter (Volume 2, Chapter 11: Offshore Ornithology).
Offshore Ornithology meeting	12.09.2022	RSPB Scotland	Virtual meeting	The purpose of this meeting was to provide RSPB Scotland with an overview of the offshore ornithological work to date, understand what they would expect to see within the Morven Site Scoping Report, and to present the methods and tools proposed to be used in the EIA for their comment.	Subsequent to this meeting, engagement with this stakeholder has continued, with RSPB Scotland participating in the pre-Scoping Workshop and providing a representation as part of the Morven Option Lease Agreement Site Scoping Opinion (hereafter 'Morven Site Scoping Opinion').

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					The offshore ornithology technical annexes (Volume 3, Annexes 11.1 to 11.6, including Appendices) and EIA chapter (Volume 2, Chapter 11: Offshore Ornithology) have taken advice provided by RSPB Scotland into consideration.
Shipping and Navigation Consultation	16.12.2022	UK Chamber of Shipping (UK CoS), Northern Lighthouse Board (NLB) and Maritime Coastguard Agency (MCA)	Virtual meeting	The Applicant consulted MCA, NLB, and UK CoS to discuss the Morven Site. A project overview was presented, outlining the shipping and navigation study approach, and agreeing on methodologies for cumulative and transboundary impact assessments. • The MCA confirmed its agreement with the proposed 10nm Regional Shipping and Navigation Study Area and emphasised that the cumulative picture is the most critical aspect of the analysis. The MCA highlighted the need for detailed assessment of fishing vessel traffic and oil and gas or wind farm vessel transits to North Sea infrastructure, while also raising concerns about potential navigational squeeze if future developments beyond ScotWind proceed. • The NLB confirmed that it was satisfied with the proposed 10nm Regional Shipping and Navigation Study Area and raised no additional concerns or requirements during the consultation. • The UK CoS supported the proposed 10nm Regional Shipping and Navigation Study Area and emphasised the need to consult non-local stakeholders. They recommended that Innovation And	• Fishing, oil and gas, and wind farm vessel activity have been analysed in Section 13.7 of Volume 2, Chapter 13: Shipping and Navigation, for the EIA with further detail provided in Section 10 of Volume 3, Annex 13.1: Shipping and Navigation Shared Navigational Risk Assessment. Vessel traffic data, including rig moves, is assessed in the same sections with supplementary data in Appendices E–H. • The cumulative effects of the EIA are addressed in Section 13.13 of Volume 2, Chapter 13: Shipping and Navigation, supported by a cumulative baseline assessment produced collaboratively with other offshore wind developments (Volume 3, Annex 13.2: Shipping and

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				Targeted Oil And Gas (INTOG) sites be included in the cumulative scope despite low data confidence and highlighted the importance of capturing rig movements near Dundee, as these can be large and difficult to manoeuvre. Additionally, they noted that project vessels will add constraints and their routing to and from Morven North and South should be considered, while also expressing concerns about potential navigational squeeze if future developments beyond ScotWind proceed. Attendees agreed on the proposed study areas and methodologies for shipping and navigation analysis, including early cumulative baseline assessment using long-term Automatic Identification System (AIS) data. The Applicant committed to incorporating cumulative and transboundary considerations, including fishing activity, oil and gas transits, INTOG sites, and rig movements.	Navigation East Region Developer Group Cumulative Baseline). Future case considerations, including Innovation and INTOG sites, are detailed in Volume 2, Chapter 13: Shipping and Navigation, paragraph 13.7.2 and expanded in Section 15 of Volume 3, Annex 13.1. Stakeholders potentially affected by transboundary impacts have been consulted, as listed in Section 4 of Volume 3, Annex 13.1. INTOG sites have been included in the cumulative assessments in Section 13.13 of Volume 2, Chapter 13: Shipping and Navigation. • The impact of project vessel activities is assessed in Section 13.11, with embedded mitigation through a combined Navigational Safety Plan and Vessel Management Plan (NSPVMP) outlined in Section 13.10 of Volume 2, Chapter 13: Shipping and Navigation and

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					presented in Volume 4, Annex 5. Passage planning as a mitigation measure is acknowledged in Section 13.11, with feasibility confirmed through regular operator outreach and appropriate promulgation.
Seascape, Landscape, Visual Impact Assessment (SLVIA) and Onshore Historic Environment - Scoping Workshop Consultation	22.02.2023	NatureScot; Aberdeen City Council	Email received	The consultation aimed to agree on viewpoint locations for consideration of potential seascape, landscape and visual amenity impacts, supported by Zone of Theoretical Visibility (ZTV) maps and proposed viewpoints. • NatureScot confirmed they were satisfied with the proposed study area and viewpoints but deferred to local authorities for additional suggestions. • Aberdeen City Council requested inclusion of further viewpoints to address heritage asset settings and public spaces, specifically Baron's Cairn, Torry Battery, and Broad Hill. It was agreed to retain the proposed viewpoints while incorporating additional locations recommended by Aberdeen City Council to ensure heritage and public space considerations are addressed.	The Applicant presented additional viewpoints to Aberdeen City Council in a subsequent meeting held on 16 April 2023. The viewpoints have been presented as an appendix to Morven Site Scoping Report (within Appendix 12: SLVIA Onshore Heritage Assets Wirelines/ ZTV). The Applicant subsequently proposed that seascape, landscape and visual amenity impacts and historic environment was scoped out of further assessment (see Section 9.7.1 of Volume 9, Chapter 9.7 of the Morven Site Scoping Report). This was confirmed by MD-LOT in the Morven Site Scoping Opinion and through subsequent communications with Local Planning Authorities (see further detail in entry dated 08 August 2024 and below).

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Shipping and Navigation Consultation	13.03.2023	Aggregate Industries/SMT Shipping; Aurora; Emskip; Havila Shipping; Longship BV; North Star Shipping; Rem Offshore; Samskip; Sentinel Marine; Smyril Line; Solstad; Tidewater; Vessel Management System (VMS) Shipping; Vroon Offshore., Tidewater	Email issued (Letter)	Regular Operators were contacted by the Applicant on 10 March 2023 with a consultation letter regarding potential impacts on its PSV fleet. Rem Offshore was the only operator responding and confirmed that its operations are unlikely to be significantly affected by the Morven Site, as vessel routing depends on the oil fields they serve. Tidewater were also issued the consultation letter on 16 November 2023. Rem Offshore raised no safety concerns, provided construction zones are clearly communicated through Navigational Warnings, and expressed a preference for navigating outside designated exclusion zones. Rem Offshore also confirmed its intention to remain engaged as a marine stakeholder throughout the assessment process. Following a detailed review, Rem Offshore concluded that no major operational impacts are anticipated. With timely notification of construction and development areas via the Navigational Warnings system, passage planning can be managed effectively. Vessel Masters indicated a preference to route outside the planned construction area in line with exclusion zone requirements.	Acknowledged by the Applicant within the assessment of effects in Section 13.11 of Volume 2, Chapter 13: Shipping and Navigation, from regular operator outreach this was considered feasible with appropriate promulgation.
Offshore Ornithology Consultation	27.03.2023	NatureScot	Email received (written advice)	The purpose of the consultation was to seek NatureScot's advice on key offshore ornithology related queries following the Morven Site Scoping Report. The aims included confirming the adequacy of DAS methodology and data analysis, agreeing approaches for displacement modelling, apportioning, cumulative assessment. NatureScot confirmed (written advice) that the DAS methodology and data analysis were	This advice has been followed as set out in Volume 2, Chapter 11: Offshore Ornithology and its technical annexes (Volume 3, Annex 11.1 to 11.6) and in Volume 2, Chapter 3: Report to Inform Appropriate Assessment (RIAA) Part 3: Special Protected Area (SPA) and Ramsar Assessments. The apportioning methodology

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				acceptable and supported the use of ratio methods for unidentified birds, requesting that limitations be acknowledged in the EIA. NatureScot agreed to the proposed approaches for displacement modelling using SeabORD, apportioning with updated guidance, and cumulative assessment without requiring reassessment if the Cumulative Effects Framework (CEF) is delayed.	and results have been presented in Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Assessments and Volume 2, Chapter 3.1: RIAA: Apportioning, of the Habitats Regulations Appraisal (HRA). The CEF was unavailable for consideration at the time of undertaking the assessments and therefore the CEF tool has not been used in the cumulative and in-combination assessments for offshore ornithology of the EIA (see Section 11.4 of Volume 2, Chapter 11: Offshore Ornithology and Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Assessments, of the HRA). This approach was reconfirmed by NatureScot on 20 December 2023.
Fish and Shellfish Ecology Consultation	27.03.2023	NatureScot	Email received (written advice)	The purpose of the consultation was to seek NatureScot's advice on key fish and shellfish ecology-related queries following the Morven Site Scoping Opinion. The aims included addressing fish and shellfish ecology study area refinements. NatureScot approved the revised fish and shellfish study area with a 100km buffer, subject to adjustments based on underwater sound modelling.	This advice has been followed. The revised fish and shellfish ecology study area with a 100km buffer is described in in Section 9.2 of Volume 2, Chapter 9: Fish and Shellfish Ecology.
SLVIA and Onshore Historic Environment Morven Scoping Workshop Consultation	12.04.2023	Historic Environment Scotland (HES)	Email received (written advice)	The purpose of the written advice was to provide HES input after reviewing the scoping workshop materials, as they were unable to attend the workshop. The aim was to consider potential impacts on terrestrial and marine historic environment assets, review the information	Potential effects on seascape, landscape, visual amenity and the onshore historic environment were discussed within the Morven Site Scoping Report and were proposed to be scoped out of the

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				provided on seascape, landscape, visual and onshore historic environment matters, and confirm whether certain effects could be scoped out of further assessment. HES confirmed that, based on the distance of over 60km and wireframe analysis, significant effects on the setting of terrestrial heritage assets within their remit are unlikely and can be scoped out, provided justification is included in the Morven Site Scoping Report.	EIA Report (see Section 9.7.1 of Volume 9, Chapter 9.7 of the Morven Site Scoping Report). This was confirmed by MD-LOT in the Morven Site Scoping Opinion.
SLVIA and Onshore Historic Environment Morven Scoping Workshop Consultation	14.04.2023	NatureScot	Email received	The purpose of the consultation was to review the need for a SLVIA and discuss onshore heritage considerations ahead of the planned scoping workshop. The aim was to confirm whether the SLVIA session was necessary, given the project's offshore location (over 60km from shore), previous consultation input, and stakeholder positions. NatureScot advised that an assessment of effects on seascape, landscape, visual amenity and the onshore historic environment was not required and could be scoped out. The Applicant acknowledged this position, noting that HES had supported scoping out terrestrial heritage effects.	Potential effects on seascape, landscape, visual amenity and the onshore historic environment were discussed within the Morven Site Scoping Report and were proposed to be scoped out of the EIA Report (see Section 9.7.1 of Volume 9, Chapter 9.7 of the Morven Site Scoping Report). This was confirmed by MD-LOT in the Morven Site Scoping Opinion.
SLVIA and Onshore Historic Environment – Scoping Workshop Consultation	16.04.2023	Aberdeen City Council	Email received	The Applicant asked Aberdeen City Council to confirm agreement with the proposed viewpoints for consideration at the pre-scoping stage and sought feedback on any additional locations that could improve the understanding of potential visual impacts. Aberdeen City Council largely agreed with the proposed viewpoints but recommended adding a viewpoint along the A92 coastal road south of Stonehaven to represent road users' experience, even if impacts are likely minimal.	Potential effects on seascape, landscape, visual amenity and the onshore historic environment were discussed within the Morven Site Scoping Report (Volume 9, Chapter 9.7) and were proposed to be scoped out of the EIA. The additional viewpoint along the A92 coastal road south of Stonehaven (Viewpoint 2: Johnshaven) was included in the Morven Site Scoping Report (Section 9.7.6 and

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					Figure 12.3b of Volume 9, Chapter 9.7 within Appendix 12: SLVIA Onshore Heritage Assets Wirelines/ZTV).
SLVIA and Onshore Historic Environment – Scoping Workshop Consultation	17.04.2023	Aberdeenshire Council; MD-LOT	Email received	The aim was to confirm whether seascape, landscape, visual amenity and onshore historic environment could be scoped out and to clarify positions on the assessment approach and potential impacts on heritage assets. • MD-LOT advised that decisions on Scoping impacts in or out must be made through the formal Morven Site Scoping Opinion and could not confirm scoping out at this stage. They noted they could not attend the session but would review the minutes if it proceeded. • Aberdeenshire Council indicated satisfaction with the proposed approach and agreed that landscape, visual amenity and onshore historic environment could be scoped out due to the Morven Site's distance from shore, while awaiting confirmation from their archaeologist regarding Dunnottar Castle.	Potential effects on seascape, landscape, visual amenity and the onshore historic environment were discussed within the Morven Site Scoping Report (Volume 9, Chapter 9.7) and were proposed to be scoped out of the EIA (see Section 9.7.1 of Volume 9, Chapter 9.7 of the Morven Site Scoping Report). This was confirmed by MD-LOT in the Morven Site Scoping Opinion.
Scoping Workshop - Biological topics (Physical Processes, Benthic Subtidal Ecology, Fish and Shellfish Ecology, and Offshore Ornithology)	18.04.2023 and 19.04.2023	NatureScot, MD-LOT, Marine Directorate-Science, Evidence, Data and Digital (MD-SEDD, formerly Marine	Virtual workshop	This pre-scoping workshop was held to inform statutory consultees and advisors of the progress of the Morven Site Scoping Report, with regard to biological topics and landscape, visual amenity and onshore historic environment, with the following aims: • Update on Morven Site and stakeholder engagement plan; • approach to undertaking proportionate EIA;	Responses outlined in the rows below and taken into consideration within the relevant topic chapters as detailed.

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		Scotland Science (MSS)) and RSPB Scotland		• agreeing baseline datasets to be used to inform the Morven Site Scoping Report and the EIA; • setting out preliminary scoping determinations and agreeing scope of the Morven Site Scoping Report; • identifying information requirements to support Scoping determinations; • agreeing Likely Significant Effects (LSE[2]) screening criteria.	
Scoping Workshop - Biological topics (Physical Processes, Benthic Subtidal Ecology, Fish and Shellfish Ecology, and Offshore Ornithology)	18.04.2023 and 19.04.2023	NatureScot, MD-LOT, Marine Directorate-Science, Evidence, Data and Digital (MD-SEDD, formerly Marine Scotland Science (MSS))	Virtual workshop	Physical processes: NatureScot encouraged a clear distinction between receptors/pathways, noting that receptors are the geodiversity features of MPAs and all others are the pathways. If pathways approach is included in the EIA, then the assessment should only consider magnitude of change for pathways rather than also assessing sensitivity as this is not suitable for pathways. • NatureScot suggested that the loss and damage of seabed may be considered as a receptor, however this depends on the receptor/pathway distinction. • NatureScot encouraged further technical consultation on the modelling methodology and invited consultation on a summary of modelling methods and proposed presentation of outputs. • NatureScot highlighted the importance of considering whether the bathymetry data used is of sufficient resolution to distinguish the different types of bedforms.	• Physical processes: A consistent approach to physical processes pathways and receptors has been applied, assessing magnitude and receptor sensitivity to determine significance (Section 7.11 of Volume 2, Chapter 7: Physical Processes). Seabed changes have been quantified in Volume 3, Annex 7.1: Physical Processes Shared Technical Report, with ecological implications addressed in Volume 2, Chapter 8: Benthic Subtidal Ecology. • Modelling will follow the Berwick Bank methodology using the Mike Suite, as outlined in Section 7.1.8 of Volume 2,

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					Chapter 7: Physical Processes of the Morven Site Scoping Report. • Bathymetric data at 1m resolution is confirmed as sufficient for high-definition modelling (Volume 3, Annex 7.1: Physical Processes Shared Technical Report).
Scoping Workshop - Biological topics (Physical Processes, Benthic Subtidal Ecology, Fish and Shellfish Ecology, and Offshore Ornithology)	18.04.2023 and 19.04.2023	NatureScot, MD-LOT, Marine Directorate-Science, MD-SEDD	Virtual workshop	Benthic subtidal ecology: • NatureScot agreed that a good understanding of benthic habitats is being developed and broadly supported the impacts proposed to be scoped in and out. • NatureScot recommended electromagnetic fields (EMF) should be scoped in for assessment due to uncertainty around impacts on benthic species, even if only qualitatively. Confirmed that a qualitative assessment would be acceptable and advised reference to strategic projects (e.g. via ScotMER). • NatureScot advised that removal of hard substrates should be included in the assessment at this stage. • NatureScot highlighted that EMF may have negligible local effects but could contribute to cumulative impacts across multiple projects, so cumulative assessment is important. NatureScot agreed mobile/migratory shellfish species should be addressed in the fish and	Benthic subtidal ecology: Impacts to benthic subtidal ecology due to scour protection, Suspended Sediment Concentrations (SSCs) and associated deposition and EMF have since been scoped into the assessment (Table 8.6 of Volume 2, Chapter 8: Benthic Subtidal Ecology). Impacts due to changes in physical processes continue to be scoped out (Table 8.6 of Volume 2, Chapter 8: Benthic Subtidal Ecology).

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				shellfish ecology cumulative effects assessment (CEA). • NatureScot recommended potential impacts from scour should be considered in relation to sediment transport pathways. This would only require desktop calculations, not modelling. • NatureScot agreed that the Regional Benthic Subtidal Ecology Study Area presented was appropriate and sufficient. • NatureScot agreed the assessment of sensitivity should be primarily informed by Marine Evidence Based Sensitivity Assessment (MarESA) and Feature Activity Sensitivity Tool (FeAST) tools (and supplemented with any more recent, relevant evidence). • NatureScot agreed that negligible impacts in project alone assessment can be scoped out of cumulative assessment, except for EMF where cumulative effects may be significant.	
Scoping Workshop - Biological topics (Physical Processes, Benthic Subtidal Ecology, Fish and Shellfish Ecology, and Offshore Ornithology)	18.04.2023 and 19.04.2023	NatureScot, MD-LOT, MD-SEDD	Virtual workshop	Fish and shellfish ecology: • NatureScot confirmed their agreement with most of the information presented. Recommended the use of two datasets on sandeels: Langton *et al.* (2021) and sandeel modelling data available on the National Marine Plan Interactive (NMPI) mapping platform. • NatureScot agreed that ocean quahog (*Arctica islandica*) and horse mussel (*Modiolus modiolus*) should be assessed	• Fish and shellfish ecology: The additional datasets data sets on sandeels have been included in the detailed baseline characterisation provided in Volume 3, Annex 9.1: Fish and Shellfish Ecology Shared Technical Report. The latter NMPI data source has been sourced from European Marine

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				within the benthic subtidal ecology chapter. • NatureScot agreed with Fisheries Management Scotland (FMS) regarding the impact of EMF being assessed in the cumulative assessment even if it is of negligible significance in the project alone assessment. • Agreement on the use of Popper *et al.* (2014) for underwater sound modelling and the use of a 160dB threshold for behavioural disturbance (based on a number of literature sources).	Observation and Data Network (EMODnet, 2025). The impact of EMF has been assessed cumulatively with other projects (see Section 9.13.7 of Volume 2, Chapter 9: Fish and Shellfish Ecology). • Ocean quahog (Arctica islandica) and horse mussel (Modiolus modiolus) have been assessed in Volume 2, Chapter 8: Benthic Subtidal Ecology. • The Popper *et al.* (2014) thresholds have been used in the underwater sound modelling (Volume 3, Annex 10.2: Underwater Sound Shared Technical Report).
Scoping Workshop - Biological topics (Physical Processes, Benthic Subtidal Ecology, Fish and Shellfish Ecology, and Offshore Ornithology)	18.04.2023 and 19.04.2023	NatureScot, MD-LOT, MD-SEDD, and RSPB Scotland	Virtual workshop	Offshore ornithology: • NatureScot were generally in agreement with the impacts the Applicant proposed to scope in and scope out but suggested there was consideration of vessel movement. • NatureScot confirmed that displacement and mortality rates should follow NatureScot's published guidance. If alternative displacement rates are used, these should be presented alongside	Offshore ornithology: This advice has been followed. Details are presented in Section 11.4 of Volume 2, Chapter 11: Offshore Ornithology.

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				NatureScot's recommended values, with clear justification for their inclusion. • NatureScot advised against applying different thresholds for different sites or colonies, as this would add unnecessary complexity. • NatureScot noted the potential loss of sandeel habitat should be assessed carefully, and caution applied when describing such impacts as "temporary."	
Scoping Workshop - SLVIA and Onshore Historic Environment	18.04.2023 and 19.04.2023	NatureScot, MD-LOT, MD-SEDD, Aberdeen City Council, MD-SEDD	Virtual workshop	This pre-scoping workshop was held to inform statutory consultees and advisors of the progress of the Morven Site Scoping Report, with regard to seascape, landscape, visual amenity and the onshore historic environment, with the following points raised: • NatureScot agreed with the Applicant's proposal to scope out seascape, landscape, visual amenity and Onshore Historic Environment. This agreement was provided in writing prior to the workshop, which is why NatureScot did not attend the session. • Aberdeen City Council requested referencing relevant local planning documents: Aberdeen Coastal Character Assessment (Aberdeen City Council, 2021) and the Aberdeen Beachfront Masterplan (Aberdeen City Council, 2023).	• Potential effects on seascape, landscape, visual amenity and Onshore Historic Environment were presented within the Morven Site Scoping Report and proposed to be scoped out of the EIA see Section 9.7.1 of Volume 9, Chapter 9.7 of the Morven Site Scoping Report). This was confirmed by MD-LOT in the Morven Site Scoping Opinion. • The advice from Aberdeen City Council to reference relevant local planning documents was considered in producing the Morven Site Scoping Report, as stated in Section 9.7.4 of Volume 9, Chapter 9.7,.

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Scoping Workshop - Commercial Fisheries	18.04.2023 and 19.04.2023	North and East Coast Regional Inshore Fisheries Group (N&EC RIFG); Scottish Fishermen's Federation (SFF); Scottish Pelagic Fishermen's Association (SPFA); Scottish White Fish Producers Association (SWFPA); MD-LOT;	Virtual workshop	This pre-scoping workshop was held to inform statutory consultees and advisors of the progress of the Morven Site Scoping Report, with regard to commercial fisheries, with the following points raised: • The Applicant presented the proposed approach to assessing commercial fisheries within the EIA. • SWFPA asked for clarity on the proposed marshalling port and raised concerns about potential increases in vessel traffic and how this could affect static fishing gear. • SWFPA requested that the fisheries baseline assessment include ten years of data to better reflect long-term trends and the influence of Brexit and COVID-19. • SWFPA also asked whether cumulative impacts from other offshore projects would be included in the assessment. • SFF highlighted their preference for cable burial.	Feedback from the workshop was taken into account during the preparation of the Morven Site Scoping Report (July 2023). The EIA confirms that: • The CEA considers the potential combined impacts of Morven North and Morven South alongside other offshore wind farm projects (Section 12.12 of Volume 2, Chapter 12: Commercial Fisheries). • Assumptions for how cables may be buried are set out in the Maximum Design Scenario (MDS) (Section 12.9.1 of Volume 2, Chapter 12: Commercial Fisheries). • The Applicant's specific commitments on cable burial and the use of cable protection are detailed in Table 12.12 of Volume 2, Chapter 12: Commercial Fisheries.
Scoping Workshop - Offshore Ornithology follow up	25.05.2023	NatureScot	Email received (written advice)	The Applicant requested NatureScot's advice to confirm that the proposed approach to assessing offshore ornithology impacts for the Morven Site was appropriate, proportionate, and aligned with current guidance for EIA and HRA. NatureScot was consulted to validate impact pathways, modelling	• This advice was taken into account in the Morven Site Scoping Report, Section 8.4.4 of Volume 8, Chapter 8.4: Offshore Ornithology.

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				triggers, datasets, and screening methods before submissions of the Morven Site Scoping Report. • NatureScot advised that the disturbance from vessel traffic may need to be included in the assessment depending on final vessel routes. • NatureScot requested that the Applicant used the guidance displacement and mortality rates until updated evidence is published, applying a precautionary approach. • NatureScot advised that Population Viability Analysis (PVA) was undertaken over 25 and 50 years, and the proposed period of operation (in this case 35 years). It advised that the trigger for PVA was set at a precautionary threshold (for example, ≥0.02 percentage-point reduction in adult survival), while avoiding rigid thresholds that could miss local sensitivities. • In the absence of guidance on assessment of Highly Pathogenic Avian Influenza (HPAI), NatureScot advised that time should be scheduled post-scoping opinion and pre-application to consider potential implications of HPAI. • NatureScot requested more detail on cumulative impacts in the non-breeding season to be provided. • NatureScot requested that the Applicant applied the latest tools and publications when available (e.g., Guidance Note 10, FeAST, migration Collision Risk Modelling (CRM)/migratory CRM updates) and assessed migratory collision risk	• Consideration of potential for impacts from vessel traffic was incorporated into "Direct temporary habitat loss/disturbance" and "Indirect temporary habitat loss/disturbance" impacts, as confirmed in Table 8.25 of the Morven Site Scoping Report, Volume 8, Chapter 8.4: Offshore Ornithology. • The assessments of displacement presented throughout the application incorporate the displacement and mortality rates recommended by NatureScot and those advocated by the Applicant. Justification for their use has been provided in Volume 3, Annex 11.4 Offshore Ornithology Displacement Modelling Report (Matrix Approach). • This advice regarding the PVA has been addressed in Volume 3, Annex 11.6: Offshore Ornithology Regional Population Viability Analysis. The advice on 25, 35 and 50-year PVA scenarios was

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				qualitatively using existing strategic evidence. • For HRA, NatureScot advised the use of precautionary long lists initially, based on SPA connectivity and appropriate buffers, and that these should then be refined following completion of the two-year DAS analysis. • NatureScot requested that the Applicant explain the high proportion of unidentified birds in Year-1 DAS data and how this compared to other surveys.	superseded by email correspondence with NatureScot on 02 July 2025, as an outcome of the Scottish Renewables Ornithological Impact Assessment Streamlining Project (as detailed within this Annex). • The potential effects on HPAI on species of relevance to the Morven Site has been considered in Section 11.7.8 of Volume 2, Chapter 11: Offshore Ornithology, incorporated into the assessments in Section 11.11 through each species recoverability as defined in Table 11.21, and in Chapter 3, Annex 11.1 Offshore Ornithology Baseline Characterisation Report. • Details on cumulative impacts in the non-breeding season was provided by the Applicant in an email on the 19 June 2023 with further correspondence in the 03 July 2023. • The collision risk model recommended by NatureScot has been

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					used (see Volume 3, Annex 11.2: Offshore Ornithology Collision Risk Modelling Report for the full methodology). • Within Section 5 of Volume 2, Chapter 1: RIAA Part 1: Introduction and Sections 3 and 5 of Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments, of the HRA, the list of SPAs has been reconsidered following the completion of the DAS analysis. Where relevant, Section 5 of Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments, follows the same assessment process as the Volume 2, Chapter 11: Offshore Ornithology. • Regarding the high proportion of unidentified birds in Year-1 DAS data, the Applicant confirmed that birds identified at a species group level have been attributed to species level and incorporated into the calculation of abundance estimates presented throughout the application. Please see

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					Volume 3, Annex 11.1: Offshore Ornithology Baseline Characterisation Report for further information following the approach described by NatureScot. This follows the approach supported by NatureScot (please see pre-application consultation conducted on 27 March 2023).
Scoping Workshop -Marine Mammals follow up	25.05.2023	NatureScot	Email received (written advice)	The Applicant consulted NatureScot to confirm that the proposed baseline, impact pathways, and assessment methods for benthic habitats and species were appropriate for the Morven Site Scoping Report. The consultation aimed to ensure that sensitive seabed features were fully considered and that the scope of assessment aligned with best practice. • NatureScot agreed with the regional marine mammal study area and confirmed the proposed baseline datasets were appropriate, recommending SCANS-IV data be used when available. • Humpback whale should be included qualitatively due to increased sightings along the east coast. • NatureScot stressed the importance of using the CEF and coordinating piling schedules with neighbouring projects to reduce cumulative underwater sound impacts. • NatureScot raised concerns about allocating unidentified species	Data sources identified in Section 10.6.3 of Volume 2, Chapter 10: Marine Mammals were used to establish the ecological baseline for marine mammals, supported by the findings of Hague *et al.* (2020) and Lacey *et al.* (2022), which are presented in Volume 3, Annex 10.1: Marine Mammals Shared Baseline Technical Report; the SCANS-IV survey outputs (Gilles *et al.*, 2023; 2025) were also incorporated to assess potential impacts (Section 10.6 of Volume 2, Chapter 10: Marine Mammals). The assessment confirmed that vessel-related impacts during the O&M phase are not significant and have therefore not been taken forward in this chapter. In line with NatureScot's advice, underwater sound has been assessed using a dual-metric approach, peak sound pressure level (SPLpk) and

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				proportionally in aerial surveys, requesting the dataset be presented with and without such allocations. • NatureScot raised that modelling for piling should use maximum hammer energy as a precaution, acknowledging uncertainty in ramp-up sound levels. • NatureScot raised that a dual-metric underwater sound assessment (SPLpk and SELcum) was supported, along with precautionary treatment of both instantaneous and accumulated injury risks. • NatureScot raised that for unexploded ordnance (UXO) clearance, NatureScot agreed that Temporary Threshold Shift (TTS) is an appropriate proxy for behavioural disturbance, and recommended low-order disposal techniques where possible. • NatureScot advised limiting the duration of Acoustic Deterrent Devices (ADDs) to around 30 minutes; use beyond this should trigger consideration of other noise-abatement measures. • For HRA, NatureScot advised screening in only the Moray Firth SAC for bottlenose dolphin and applying distance-based rules for seal Special Area of Conservation (SAC) connectivity (20km for grey seals, 50 km for harbour seals). • NatureScot agreed that vessel-related disturbance should be screened in initially	24-hour cumulative sound exposure level (SEL24h), as detailed in Volume 3, Annex 10.2: Underwater Sound Shared Technical Report, and no additional mitigation measures were deemed necessary. Piling assessments considered potential injury ranges both with and without the use of ADDs, with modelling undertaken on the basis of a 30-minute ADD activation period (Section 10.11.1 of Volume 2, Chapter 10: Marine Mammals). For potential UXO clearance, has been applied as a proxy for behavioural disturbance. While the CEF tool was not available at the time of writing, population-level effects from underwater sound generated by piling were modelled using the iPCoD framework (Section 10.11.1 of Volume 2, Chapter 10: Marine Mammals), and the modelled species and results were subsequently reviewed and agreed with NatureScot at a meeting on 22 October 2025. The Morven North and Morven South Regional Marine Mammal Study Area is defined in Section 10.2 of Volume 2, Chapter 10: Marine Mammals, and further clarification was provided in response to NatureScot's written

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				to determine whether it can later be scoped out.	representation. In addition, humpback whale has been qualitatively considered within this chapter (Section 10.11 of Volume 2, Chapter 10: Marine Mammals).
Scoping Workshop - Commercial Fisheries follow up	21.06.2023	SWFPA	Email received	The Applicant consulted the SWFPA to understand the level, nature, and seasonal variations of commercial fishing activity within Morven Site. The aim was to ensure that fishing operations, particularly whitefish activity, were accurately represented early in the Scoping process. • SWFPA highlighted that the Morven Site is a heavily used fishing area, with activity varying significantly by season and quota availability. • SWFPA noted that their plotter shot data (with no time stamps) shows presence of fishing activity within Morven North and Morven South. • SWFPA requested that any fishing activity shown in public documents be displayed in a confidential, aggregated format, rather than using raw track data, to protect sensitive commercial information.	The advice from the scoping workshop was considered in preparation of the Morven Site Scoping Report (July 2023) and in development of the commercial fisheries baseline described in Section 12.7 of Volume 2, Chapter 12: Commercial Fisheries and in Volume 3, Annex 12.1: Commercial Fisheries Technical Report. The baseline characterisation has considered long-term patterns in fisheries activity, exploring fisheries data across a 10-year period where possible and examined seasonality in landings across Morven Site Local and Regional Commercial Fisheries Study Areas. Data were presented in a way that protects sensitive commercial information.
Scoping Workshop - HRA RIAA follow up	03.07.2023	NatureScot	Email received	The Applicant consulted NatureScot for advice to clarify how fish and shellfish ecology receptors, particularly diadromous species such as salmon and eels, should be treated within the EIA and HRA. NatureScot confirmed that seal SACs can be excluded from the HRA if telemetry data shows the project area is not a foraging hotspot for seals	NatureScot's advice has been acknowledged by the Applicant. However, as diadromous fish are a listed Annex II feature of SACs, the diadromous Atlantic salmon has been assessed within Section

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				from designated SACs. They agreed that bottlenose dolphins may not be a key receptor in the offshore EIA if underwater sound contours do not overlap with the Coastal East Scotland Management Unit (MU) but highlighted the need to consider the offshore population within the Greater North Sea MU. NatureScot also reiterated their position that diadromous fish should be assessed under EIA, not HRA, due to insufficient evidence to support a robust HRA assessment.	3.2.2 and Section 5 of Volume 2, Chapter 2: RIAA Part 2 of the HRA. NatureScot's advice has been acknowledged by the Applicant. However, to remain complaint with Natural England's requirements regarding screening for seal and harbour porpoise SACs all five SACs have been retained for inclusion within this RIAA Part 2 (i.e. Moray Firth SAC for bottlenose dolphin, Southern North Sea SAC for harbour porpoise, Berwickshire and North Northumberland Coast SAC and Isle of May SAC for grey seal and Firth of Tay and Eden Estuary SAC for harbour seal). The decision to retain the three seal SACs was also informed by Volume 3, Annex 10.4: Marine Mammals Shared Seal Telemetry and Haul-out Data Study Technical Report, of the EIA, which suggests connectivity between the Morven North Boundary and all three SACs. This is presented in Section 3.2.3 and Section 6 of Volume 2, Chapter 2: RIAA Part 2 of the HRA.
HRA Screening Consultation - for birds in the non-breeding season	03.07.2023	NatureScot	Email received	The consultation aimed to clarify NatureScot's guidance on Offshore Ornithology Impact Pathways for Offshore Wind Developments, specifically regarding alternative approaches to biological defined minimum population scale (BDMPS) for assessing cumulative impacts on	The Applicant has agreed a bespoke approach for guillemot based on additional pre-application consultation undertaken on 23 October 2025. For razorbill the approach

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				guillemots and razorbills during the non-breeding season. The Applicant asked NatureScot to provide details on what "other agreed approaches" meant in the Guidance Note, beyond BDMPS, for cumulative assessment of guillemots and razorbills in the non-breeding season. • NatureScot's Position on Guillemots: advised against using BDMPS for guillemot cumulative assessment in the non-breeding season. Instead, recommended applying the breeding season approach of mean-max foraging range plus one standard deviation, based on Buckingham *et al.* (2022) tracking data. • NatureScot's Position on Razorbills: For razorbills, NatureScot confirmed that the BDMPS region remains appropriate for screening cumulative impacts during the non-breeding season. • NatureScot clarified that for guillemots, the alternative agreed approach is the breeding season foraging range method (mean-max + 1 SD), while for razorbills, the existing BDMPS region should continue to be used for cumulative impact screening in the non-breeding season.	proposed by NatureScot has been followed. Details are described in Section 11.7.5 of Volume 2, Chapter 11: Offshore Ornithology and Section 5.2 of Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments.
Morven Site Scoping Report	17.07.2023	MD-LOT	Report	Morven Site Scoping Report submitted to MD-LOT, which has been provided alongside the application as part of the Additional Application Documents.	N/A
Pre-application consultation					
HRA Screening Consultation - for harbour porpoise	24.10.2023	Natural England	Email received	Natural England advises that the Southern North Sea (SNS) SAC should remain part of the HRA for Morven Site because there is a likely significant effect on harbour porpoise, which move widely	The Southern North Sea SAC has been retained for inclusion within Section 6 of Volume 2, Chapter 2: RIAA Part 2: SAC Assessments of

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				across the North Sea and may travel between the SAC and the project area. This position differs from NatureScot's view that the site could be screened out. • Natural England states there is a credible impact pathway between the Morven Site (off the Scottish coast) and the SNS SAC in English waters. • NatureScot advised the SAC could be screened out because harbour porpoise in Scottish waters "cannot be identified as coming from an SAC population." Natural England disagreed, emphasising that population connectivity and regional population structure, not individual identification, are what matter for screening decisions. • Natural England advises on English territorial and offshore waters, including impacts to species connected to English Marine Protected Areas (MPAs), regardless of whether developments lie outside England.	the HRA. Information on the SNS SAC is also presented in Section 10.7.3 of Volume 2, Chapter 10: Marine Mammals.
Post-Scoping Consultation - Socio-Economics	02.11.2023	MAU	Email issued to MAU (Letter)	The letter provided a response from the Applicant to points raised by the MAU in their response to the Morven Site Scoping Report. The following points were made: • The Applicant noted that the MAU broadly agrees with the proposed approach to assessing economic impacts and as requested, the socio-economic assessment includes a detailed description of the methodology used to assess economic impacts.	• Since issue of the Morven Site Scoping Report, the Applicant has decided on a broader ports strategy and no specific ports have been selected. As is standard practice for projects of this scale, final port selection will be undertaken closer to the construction phase.

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				• With regard to the request that primary research is undertaken with stakeholders and communities as part of the social impact assessment, the Applicant notes that Morven Site is located approximately 60km from the Aberdeenshire coast with no communities in the immediate vicinity. The socio-economic assessment has considered onshore study areas where there could be geographically concentrated economic and social impacts, including those expected in the vicinity of construction and operation and maintenance ports. However, the location of such ports was not known at the time of undertaking the socio-economic assessment and it was not possible to identify the specific relevant communities for consultation at this stage. • Any community consultation in the vicinity of ports undertaken at the EIA stage would involve a large number of potential locations on a speculative basis, which is not considered feasible or desirable and could potentially lead to engagement fatigue. • The Applicant formally requested that MAU's recommendations on social impact assessment and community consultation not be included in the Morven Site Scoping Opinion. • The Applicant noted the importance of community consultation, however proposed that this is best done separately from the EIA and consenting process and would have most value if led by ports or at	• Collection of primary data and stakeholder mapping was not possible as construction and O&M ports have not been selected. As a result, it was not possible to consult with the range of stakeholders suggested by the MAU. As stated in Table 17.19 of Volume 2, Chapter 17: Socio-Economics, a Community Engagement Plan will be implemented once construction and O&M ports have been selected. • A list of potential port locations on the east coast of Scotland has been considered in order to identify the MDS as described in Section 17.2 of Volume 2, Chapter 17, and a MDS port selected and assessed as part of the social impact assessment.

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				the industry level. The Applicant proposed to carry out a robust and meaningful programme of stakeholder and community engagement as part of the pre-application process. • Engagement will follow best-practice principles, focusing on early communication, collaboration, and openness with stakeholders and communities.	
Scoping Opinion	30.11.2023	MD-LOT Aberdeen City Council, Aberdeenshire Council, Aberdeen International Airport, Angus Council, Berwick Bank OWF, British Telecom, East Lothian Council, Fisheries Management Scotland, Forth Ports, HES, Maritime and Coastguard Agency, National Air Traffic	Document received	MD-LOT provided a comprehensive set of comments in response to the Morven Site Scoping Report through the Morven Site Scoping Opinion (MD-LOT, 2023).	Advice from MD-LOT and statutory stakeholders has been considered in the production of the Morven North EIA Report (Volumes 1 to 4) and the Morven South EIA Report (Volumes 1 to 4) as well as the Morven North HRA (Volumes 1 to 3) and the Morven South HRA (Volumes 1 to 3). Detailed responses to the Scoping Opinion have been provided to MD-LOT as Additional Application Information within the Gap Analysis.

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		Services, NatureScot, Natural England, RSPB Scotland, SSEN Transmission, SFF, Scottish Water, UK Chamber of Shipping, NLB, Royal Yachting Association Scotland, Marine Directorate – Science, Evidence, Digital and Data (MD-SEDD), the Marine Directorate – Marine Analytical Unit (MAU), and Transport Scotland (including			

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
		Ports and Harbours)			
Offshore Ornithology CEF Consultation	20.12.2023	NatureScot	Email received	The Applicant approached NatureScot on 07 December 2023 to seek clarification on the proposed apportioning approach, particularly whether the Butler apportioning tool will be updated to reflect new Seabirds Count census data, given that seabird populations have changed substantially since the earlier Seabird 2000 dataset. • NatureScot noted that apportioning will be undertaken through the new CEF once it is in place. • The CEF will combine both the Butler tool and NatureScot's theoretical apportioning approach, depending on what is most suitable for each assessment. In a meeting on the 14 February 2024, between NatureScot, MD-LOT and the ScotWind Northeast and East Ornithology Group (NEEOG), an Interim Solution to the CEF was proposed, and attendees agreed on a work package to collate ornithology cumulative and in-combination totals for NE and E projects, using an approach aligned with Berwick Bank. NatureScot and MD-LOT supported the proposal, noting links to RenewablesUK data and the CEF data library, and requested integration of draft guidance and lessons learned. A phased update schedule (2024–2026) was agreed, with a structured review and consultation process involving developers, NatureScot, and MD-LOT.	• The CEF had not been published at the of undertaking assessments and has therefore not been used within the cumulative and in-combination assessments presented within Section 11.12 and 11.13 of Volume 2, Chapter 11: Offshore Ornithology and Volume 2, Chapter 3.1: RIAA: Apportioning of the HRA. The Applicant undertook further engagement on this matter, issuing a letter on 01 October 2025 to NatureScot and MD-LOT (see further detail on 01 October 2025 row below). • The apportioning approach is detailed in Volume 2, Chapter 3.1: RIAA: Apportioning, of the HRA, which follows the approach recommended in NatureScot (2018) and incorporates further advice provided by NatureScot on 28 January 2025 and 28 May 2025.

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Ministry of Defence (MOD) Scoping Opinion	02.01.2024	MOD	Document received	The MOD provided a response to the Morven Site Scoping Report separately to the Morven Site Scoping Opinion detailing their responses on matters relating to aviation and radar. • The MOD identified potential impacts on the Remote Radar Head (RRH) Buchan Air Defence Radar (ADR); • The MOD highlighted the risk of obstruction to military low-flying operations and requested that appropriate aviation lighting be fitted to ensure visibility to military and civilian aircraft; • The MOD confirmed that no impacts are anticipated on the Practice and Exercise Areas (PEXA) range or the Leuchars Primary Surveillance Radar; and noted the potential for the development to affect highly surveyed military transit routes.	Advice from the MOD has been considered in the production of Volume 2, Chapter 15: Aviation (Military and Civil)). Detailed responses to the MOD Scoping Opinion have been provided to MD-LOT as Additional Application Information within the Gap Analysis.
Post-Scoping Scottish fisheries stakeholder engagement meeting	09.02.2024	SFF SWFPA	Face to Face meeting	An update was provided on the progress of Morven Site, including progress of the EIA and engagement plans with the fishing industry. Key discussions included stakeholder feedback on cable protection methods, data sharing for fisheries impact assessment, and the formation of collaborative working groups to ensure inclusive and informed decision-making. Feedback from the fishing industry: • SFF/SWFPA preference for monopile foundations due to their smaller footprint and reduced impact on fishing operations. • SFF/SWFPA expressed concerns about cable protection methods, with a preference for rock placement over	The SFF and SWFPA's position is acknowledged, and the commercial fisheries assessment has been carried out using an MDS, as outlined in Section 12.9.1 of Volume 2, Chapter 12. The Applicant will continue to engage constructively with the fishing industry as the project design progresses, and the SFF will be consulted on the relevant post-consent plans that set out final design details before these are submitted for approval to the Scottish Ministers.

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				concrete mattresses to avoid fishing gear entanglement. • SFF/SWFPA emphasised the need for clear vessel management planning.	
Offshore Ornithology Consultation - Scoping Opinion	12.03.2024	Natural England	Email issued (Letter)	The Applicant requested further advice from Natural England following the publication of the Scoping Opinion, particularly regarding species identification methods for auks and the use of a standard ratio approach to assign unidentified birds.	Further consultation with Natural England took place on 07 March 2025 (see further details in this Annex below)
Offshore Ornithology Consultation - Scoping Opinion	27.03.2024	NatureScot	Email issued (Letter)	The Applicant requested further advice from NatureScot following the publication of the Scoping Opinion. The purpose of the consultation was to clarify NatureScot's expectations on survey methods, assessment tools, species-specific assumptions, cumulative assessment approaches, and data sources required to complete the offshore ornithology impact assessment.	See subsections below for the Applicant's response to specific points in this consultation.
				NatureScot were content with the DAS survey approach, confirming that the disturbance to diver or duck species from low flight height was unlikely to be of concern, and that analysis of 12% of the data was acceptable. NatureScot confirmed to be content with the approach to availability bias, advising that they accepted correction factors derived from Thaxter *et al.* (2010) for common guillemot and razorbill and from Spencer (2012) for puffin.	The Applicant welcomed NatureScot's agreement on the key offshore ornithology points, which have been incorporated into assessments presented in Volume 2, Chapter 11: Offshore Ornithology, and Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments, of the HRA.
				NatureScot confirmed a number of queries regarding SeabORD. NatureScot confirmed it was acceptable to use the current version of SeabORD in the absence of the CEF and to use the distance decay method. They advised contacting MD-LOT regarding access to SeabORD. NatureScot	For SeabORD, this response has now been superseded by advice provided through subsequent consultation on 28 May 2025. The SeabORD methodology and results are set out in Volume 3,

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				confirmed that sub-colonies that are part of an SPA should be combined to allow more SPAs to be modelled at the same time. NatureScot noted that the list of sites to be assessed would need to be refined, and recommended considering: the proximity to the colony, colony size, available tracking data, and the outcomes of apportioning. NatureScot advised that scaling factors to overcome issues involved with running the SeabORD application were acceptable. However, advised that in general, SeabORD should be run for a whole population where feasible and it must be run for at least half of a population. NatureScot agreed with the approach using displacement matrices and SeabORD within the PVA modelling to allow for comparison of results. SeabORD should be used for the displacement assessment of kittiwake, common guillemot, razorbill and puffin, but in the chick rearing period only. NatureScot noted that SeabORD should be run for the project alone and not for the cumulative assessment, due to the current version of the tool only supporting five offshore wind projects. NatureScot confirmed they were currently discussing this with MD-LOT and would pass on any conclusions about a way forward as soon as they were reached.	Annex 11.5: Offshore Ornithology Displacement Modelling Report (SeabORD), although the Applicant highlights that NatureScot's more recent advice (23 June 2025) confirmed that the matrix approach should be used as the primary assessment method.
				NatureScot agreed that until the Butler tool is updated as part of the CEF, to enable Seabirds Count data to be utilised, the tool could not be used. Instead, NatureScot suggested a theoretical apportioning approach should be applied, and that apportioning allocated to sites with sufficient tagging data may be re-apportioned depending on the results of tracking analysis. NatureScot referred to their interim Guidance Note on	The apportioning approach used for the Morven North and Morven South has been described in Volume 2, Chapter 3.1: RIAA: Apportioning, of the HRA, following NatureScot (2018) guidance and incorporating further advice issued on 28 January 2025 and 28 May 2025.

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				apportioning (NatureScot, 2018). NatureScot confirmed that if the CEF was not available at the time of the assessment, that the Applicant would not be required to redo assessments following the publication of the CEF. NatureScot noted that they expected a new report on demographic rates, in relation to productivity and survival, to be ready within the coming weeks (from the time of writing).	The demographic rates report referenced by NatureScot had not been published at the time of writing, and the CEF also remained unpublished and has therefore not been used within Volume 2, Chapter 11: Offshore Ornithology.
				NatureScot confirmed that (at the time of writing) they had not produced any guidance on how to include HPAI in impact assessments. - NatureScot noted that as the aerial survey work included HPAI outbreak years, it would be important to consider the current status of seabird populations at SPA colonies. NatureScot refer to recent data from key seabird colonies coordinated by the RSPB.	Potential impacts of HPAI on relevant species have been considered in Section 11.7.8 of Volume 2, Chapter 11: Offshore Ornithology and reflected in the assessments presented in Section 11.11 of Volume 2, Chapter 11: Offshore Ornithology through species-specific recoverability (Table 11.21), with additional detail provided in Chapter 3, Annex 11.1 of the Offshore Ornithology Baseline Characterisation Report.
Shipping and Navigation Consultation - MCA	02.05.2024	MCA	Virtual meeting	The Applicant met with the MCA on 02 May 2024 to discuss navigation and shipping. The purpose of the meeting was to review cumulative shipping routeing options in the region, understand how commercial vessels are likely to navigate around the Morven Site and neighbouring offshore wind projects, particularly Ossian and to ensure that the project layout maintains safe and practical sea space for marine traffic. • MCA discussed regional vessel routeing patterns and reviewed the Morven Site assessment showing viable navigation	The advice from MCA was considered in the analysis of future case routeing in Section 13.15 of Volume 2, Chapter 13 and the cumulative risk assessment in Section 13.12 as well as Section 21 of Volume 2, Chapter 13 to 23 of Volume 3, Annex 13.1: Shipping and Navigation Shared Navigational Risk Assessment.

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				corridors to both the east and west of the Morven and Ossian arrays. • MCA noted the evidence provided by the Applicant indicating that local vessel activity in the area is relatively low, supporting the feasibility of the proposed routeing options. • MCA agreed with the conclusion, supported by consultation for the Ossian project, that the sea space between the Morven Site and Ossian is unlikely to be used by vessels, as most traffic tends to travel closer inshore or further offshore instead. • Based on current vessel behaviour, the length of the gap between the projects, and expectations for future marine activity, MCA confirmed they were content for the boundaries between Morven and Ossian to remain unchanged. • MCA emphasised that developers should maximise available sea space wherever practicable, noting that increased sea room can provide safety and navigational benefits for shipping. They advised that this preference should be considered in future layout discussions.	
Physical Processes Consultation	22.05.2024	MD-LOT, MD-SEDD	Email received (Letter)	This consultation aimed to confirm the proposed approach for assessing potential changes to water column stratification arising from Morven North and Morven South. The Applicant proposed a qualitative assessment supported by two-dimensional (2D) modelling rather than	An addendum to the physical processes stratification method statement was provided to MD-LOT on 26 July 2024, whereby a proposal to provide high level 3D modelling in the assessment of seasonal stratification was incorporated. The assessment of

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				undertaking full three-dimensional (3D) hydrodynamic modelling. • MD-SEDD requested further information on methodology for assessment of the impact to stratification and advised that the fundamental mechanism for stratification to be impacted is through the addition of turbulence within the water column. • MD-SEDD highlighted the limitations of 2D modelling in this regard and advised the use of 3D modelling within the assessment. Clarification should be provided on how the support structures are being parameterised as sub-grid scale objects within the modelling and the effect of wind wakes on stratification.	the impact due to the presence of the infrastructure within the water column and due to a reduction in wind wakes is presented in Section 7.11.6 of Volume 2, Chapter 7: Physical Processes.
Commercial Fisheries Consultation - fisheries engagement with various stakeholders (including local fleet)	17.04.2025 to 28.04.2025	fisheries engagement with various stakeholders (including local fleet)	Email issued	The Applicant engaged with commercial fisheries stakeholders to ensure that fishing activity within and around the Morven Site was accurately understood and properly reflected in the EIA. The consultation aimed to gather first-hand information on fishing operations, confirm which vessels work in areas potentially affected by the project, and provide fishermen with charts and questionnaires to capture detailed spatial and operational data. • Baseline data collection questionnaires, including charts, were issued by email and through informal in-person visits to local harbours.	Fisheries engagement in relation to Morven Site has been extensive and has involved Applicant-led engagement with fishing industry representative bodies, public events and direct engagement with fishers via the appointed Company Fisheries Liaison Officer (CFLO). Engagement is summarised in Section 12.4 of Volume 2, Chapter 12: Commercial Fisheries. Feedback on fishing activity relevant to Morven Site obtained via questionnaire responses has informed the baseline characterisation presented in Volume 3, Annex 12.1:

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					Commercial Fisheries Technical Report.
Pre-application engagement with Scottish Fisheries Stakeholders	14.06.2024	SFF, SWFPA, North and East Coast Regional Inshore Fisheries Group (RIFG), SPFA.	Virtual meeting	The Applicant provided updates on project progress, highlighting ongoing grid connection uncertainties and outlined separate consenting strategies for the Morven Site and Morven Hawthorn Pit Grid Connection Project (hereafter 'MHPGC Project'), with upcoming public engagement events planned in Seaham and continued collaboration with fisheries stakeholders through quarterly meetings and regional working groups. • The SWFPA expressed concerns regarding the increasingly limited sea space between the Morven Site and the Ossian array given the high number of cable developments.	The Applicant noted the concern. Cumulative effects on commercial fisheries resulting from Morven North and Morven South and other offshore wind farm developments are assessed in Section 12.12 of Volume 2, Chapter 12: Commercial Fisheries. The CEA includes consideration of Ossian. Impacts on the navigational safety aspects of fishing activity are assessed in Volume 2, Chapter 13: Shipping and Navigation, where consideration is given to sea space between the Morven North and Morven South boundaries and Ossian.
Commercial Fisheries Consultation - quarterly meeting with fisheries stakeholders	14.06.2024	SFF, SWFPA, N&NE RIFG and Scottish Pelagic Fishermen's Association	Virtual meeting	The Applicant announced that the Morven Site and MHPGC Project elements will be taken forward through separate consent applications. They noted that the Applicant received its Morven Site Scoping Opinion in November 2023. They confirmed that the grid connection works will require two separate applications, reflecting the two grid connection points. Throughout this process, the Applicant is actively engaging with the fishing industry through a range of different outreach methods to ensure open communication and ongoing involvement.	The Applicant notes the concern. Cumulative effects on commercial fisheries resulting from the Morven Site and other offshore wind farm developments are assessed in Section 12.12 of Volume 2, Chapter 12: Commercial Fisheries. The CEA includes consideration of Ossian. Impacts on the navigational safety aspects of fishing activity are assessed in Volume 2, Chapter 13: Shipping and Navigation, where consideration is given to sea

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					space between the Morven North and Morven South and Ossian.
Offshore Ornithology Consultation - Population Viability Analysis	25.07.2024	NatureScot	Email received	The Applicant sought clarification from NatureScot on several technical aspects of the offshore ornithology assessment, including the requirements for PVA and the appropriate availability bias values to use in modelling. • NatureScot confirmed (on 06 July 2024) that PVAs are required for all species and designated sites where combined breeding and non-breeding impacts reach or exceed the 0.02 percentage-point change in adult survival threshold. • NatureScot further advised (on 22 July 2024) that availability-bias values from Dunn *et al.* (2024) cannot currently be endorsed because the paper is still in preprint and undergoing peer review. Until official guidance is issued, it was advised that existing correction factors should continue to be applied: Thaxter *et al.* (2010) for guillemot and razorbill and Spencer (2012) for puffin. • NatureScot reiterated (on 25 July 2024) that Dunn *et al.* (2024) remains a preprint and cannot yet be relied upon, as the UK Statutory Nature Conservation Bodies (SNCBs) are still considering how the new availability-bias values should be applied. In the meantime, NatureScot reconfirmed that the Applicant should apply correction factors noted on 22 July 2024.	Detail on the methodology and results of the PVA has been provided in Table 11.7 of Volume 2, Chapter 11: Offshore Ornithology and Volume 3, Annex 11.6, Offshore Ornithology Regional Population Viability Analysis, and follow the approach recommended by NatureScot. Methods used to calculate abundance estimates are detailed in Volume 3, Annex 11.1, Offshore Ornithology Baseline Characterisation Report, and follow the approach recommended by NatureScot. The methodology and results of the PVA applied within the RIAA have been developed in line with NatureScot's guidance and are set out in Volume 2, Annex 3.2: RIAA Population Viability Analysis and Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments, of the HRA.
Physical Processes	26.07.2024	MD-SEDD (via MD-LOT)	Email issued (Addendum)	Following the consultation on the 22 May 2024 the Applicant consulted with MD-SEDD to agree an	The Applicant provided further details in response via email on 11

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Consultation - seasonal stratification				improved method for assessing how the Morven Site might affect seasonal water-column stratification. In response to MD-SEDD's advice, the Applicant prepared an addendum that updates the assessment approach by incorporating 3D hydrodynamic modelling using the MIKE software suite, allowing temperature, salinity, turbulence, and wind-wake effects to be more accurately represented around turbine foundations. On 26 August 2024, MD-LOT responded: • MD-SEDD welcomed the use of the 3D model and considered the development of a smaller domain to be pragmatic. Further details on the simulation duration or time periods were requested and advised the capture of the onset and decay of stratification over a spring neap cycle. • MD-SEDD recommended that the Scottish Shelf Waters - Reanalysis Service data should be examined to determine suitable time periods to model. • MD-SEDD requested clarification on pier parameterisation.	February 2025, including MIKE 3 documentation on the parametrisation of structures.
SLVIA and Onshore Historic Environment Consultation	08.08.2024	East Lothian Council, Angus Council, MD-LOT	Email received	East Lothian Council confirmed they were content for SLVIA to be scoped out based on the wireline imagery and project description presented in the Morven Site Scoping Report and additional wirelines relating to the Morven Site as modelled from the top of North Berwick Law, which were provided to East Lothian Council on 06 September 2023. • Angus Council responded on 14 August 2024, confirming that the wirelines and the potential visual, seascape and landscape impacts as presented within the Morven	• The potential for impacts on seascape, landscape, visual amenity and onshore historic environment was presented within the Morven Site Scoping Report (Volume 9, Chapter 9.7) and proposed to be scoped out of the EIA.

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				Site Scoping Report were unlikely to have any significant adverse impacts on Angus Council. Therefore, if MD-LOT were content to scope SLVIA out of further assessment, Angus Council would have no objection to this approach. • MD-LOT responded on 23 September 2024: Having reviewed the correspondence with Angus Council and East Lothian Council, MD-LOT reconfirmed agreement for SLVIA to be scoped out, in accordance with the Scoping Opinion issued by MD-LOT on 30 November 2023.	• The Applicant subsequently proposed that seascape, landscape, visual amenity and onshore historic environment was scoped out of the EIA (see Section 9.7.1 of Volume 9, Chapter 9.7 of the Scoping Report for the Morven Site). • Additional wirelines relating to the Morven Site are presented in Appendix A (North Berwick Law, Ethie Haven and Dunninald Castle) of this Annex.
Consenting Strategy Consultation – Offshore Ornithology	21.08.2024	NatureScot	Email received	The Applicant consulted NatureScot to confirm the most appropriate way to progress with MRSea modelling after uncertainties around grid connections required the potential division of the Morven Site into two distinct projects, Morven North and Morven South. The Applicant proposed dividing the modelling outputs into Morven North and Morven South, using the same modelling approach previously applied to the full the Morven Site and generating results within 2km and 4km buffers without refitting the models. They also committed to validating the outputs against design-based estimates to ensure consistency. NatureScot agreed the Applicant's proposed approach was acceptable in response to a potential division of the Morven Site into two distinct projects, Morven North and Morven South	The MRSea modelling was prepared following the advice provided by NatureScot as detailed in Volume 2, Chapter 11: Offshore Ornithology (Section 11.7.8). Design-based and model-based estimates have been presented side by side to clearly present differences between the approaches in Volume 3, Annex 11.1: Offshore Ornithology Baseline Characterisation Report.

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				with the respective buffer distances. They advised that any differences between design-based and model-based estimates should be clearly explained in the assessment and highlighted the need to be mindful of overlapping buffers when undertaking cumulative effects assessments.	
Shipping and Navigation Consultation - Hazard Workshop	04.09.2024	MCA, NLB, CoS, Royal Yachting Association (RYA) and SFF, SSE Renewables	Virtual meeting	The Applicant met with MCA, CoS, RYA Scotland, NLB and SFF to discuss navigation, safety, recreational and commercial vessel activity, and potential interactions with Morven Site and nearby developments, particularly Ossian. The meeting aimed to understand stakeholder concerns, confirm expectations for safe sea-room, and ensure the project layout supports safe navigation for all marine users. • The MCA agreed that use of the sea space between the Morven Site and Ossian is unlikely, given current traffic patterns and future development considerations. • The MCA noted that due to viable options for diversion to the east and west of the two developments, it is not necessary to request a safety case to expand the gap between the Morven Site and Ossian. • NLB expressed a preference for using construction buoys only where necessary, to avoid unnecessarily large exclusion areas and maintain safe navigation. Highlighted potential navigational impacts associated with the Eastern Green Link 3 cable project, especially if cable-laying overlaps with wind farm construction, which could restrict sea-room and increase risk.	All points raised by MCA, NLB, RYA Scotland, and SFF, have been fully incorporated into the assessment, with cumulative routeing considerations reflected in Section 13.13 of Volume 2, Chapter 13: Shipping and Navigation and construction-phase buoyage assessed in Section 13.11 of Volume 2, Chapter 13: Shipping and Navigation, noting that final marking arrangements will be agreed with the NLB through the LMP and AtoNMP and that all buoys will be tracked with recovery plans in place. The potential influence of the Eastern Green Link 3 cable project has also been included in the cumulative assessment, and concerns raised by RYA Scotland regarding buoy visibility, MetOcean buoy drift, future recreational traffic patterns, weather uncertainty, and offshore fatigue risks have been addressed within the future case discussion in Section 13.7.2 of Volume 2, Chapter 13: Shipping and

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				• RYA Scotland noted concern on the buoyage to be deployed, with potential for meteorological and oceanic (MetOcean) buoyage to drift off-station. It can be difficult for sea users to know that the buoyage is there due to the volume of added items to electronic charts and Notices to Mariners, especially if they are on the water at that time. • RYA Scotland stated that there is uncertainty on recreational vessel traffic in the future. If recreational vessels are transiting long distances it may result in passage planning earlier in the course, resulting in sufficient time to pass around the Morven Site. Although inshore transits will likely be of shorter distances and so result in less time to make these decisions. These transits will likely be much closer to the coast and further from the Morven Site. However, recreational users are finding that weather conditions are becoming increasingly more uncertain, with forecasts becoming more unreliable. • RYA Scotland highlighted uncertainty around future recreational vessel traffic, especially for long-distance transits that require earlier passage-planning compared to short inshore routes. Commented that the offshore distance of the developments could contribute to fatigue, particularly for solo sailors ("single-handers") with limited opportunity for rest. • SFF noted that as the Morven Site and other planned offshore wind farms are	Navigation and the recreational craft impact assessment in Section 13.11 of Volume 2, Chapter 3. Expected increases in vessel traffic associated with Morven and neighbouring offshore wind farms have been assessed in the future case analysis in Section 15.3 of Volume 3, Annex 13.1: Shipping and Navigation Shared Navigational Risk Assessment, with embedded mitigation measures designed to minimise interference with other sea users.

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				commissioned, vessel traffic in the area is expected to increase, which may influence navigation and fishing operations.	
Consenting Strategy Consultation	06.11.2024	MD-LOT	Virtual meeting and follow up email received	The quarterly MD-LOT meeting on 06 November 2024 introduced the revised consenting strategy to divide the Morven Site into two distinct projects, Morven North and Morven South. The meeting aimed to confirm expectations and requirements for the consent applications and to discuss the implications of the revised consenting strategy. The following points were discussed: • What MD-LOT expected to see in the EIA; • How pre-application consultation should be carried out and reported; • What mitigation, management and licensing plans must accompany the applications; • How European Protected Species and offshore ornithology guidance should be addressed; • How the revised project structure (divided into Morven North and Morven South) influenced consenting requirements. Following this meeting on 06 December 2024 the Applicant provided MD-LOT with further detail on the proposed division of the Morven Site into two distinct projects, Morven North and Morven South, focusing on environmental considerations and regulatory compliance.	The Applicant undertook further engagement with MD-LOT regarding the division of the Morven Site into Morven North and Morven South (see further details of consultation on 13 March 2025 and 21 July 2025 below). Details of the consenting strategy are provided in Volume 1, Chapter 1: Introduction, as well as detailed background and justification for the division of Morven Site into Morven North and Morven South in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives.
ScotWind East Region Commercial Fisheries Working	04.12.2024	SFF SWFPA N&EC RIFG Other East region	Virtual meeting	The ScotWind East Region CFWG held its first meeting to establish terms of reference, agree on objectives, and discuss early engagement between offshore wind developers and fisheries representatives. Key updates were provided on	The Applicant is committed to continued participation in the East Region CFWG, as confirmed in Section 12.10 of Volume 2,

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Group (CFWG) meeting		ScotWind developers.		Ossian, Morven, Muir Mhor, Campion, and Bowdun projects, highlighting progress on consents, grid connection uncertainties, and upcoming EIA work. Fisheries representatives raised concerns about cumulative spatial impacts, resource constraints, and the need for meaningful engagement rather than token consultations. The group agreed to retain a single meeting format, improve coordination with government workstreams, and include lessons learned and fisheries engagement strategies in future agendas.	Chapter 12: Commercial Fisheries.
Shipping and Navigation Consultation - MCA	12.12.2024	MCA	Email received	Anatec consulted the MCA on behalf of the Applicant to confirm the proposed methodology for the assessment of shipping and navigation impacts from Morven North and Morven South. The approach includes one Navigation Risk Assessment (NRA) covering three build scenarios, two separate EIA chapters for Morven North and Morven South, and a drop-in session in January 2025 to update stakeholders and gather feedback. They requested confirmation that the MCA was content with this strategy moving forward. The MCA stated that the proposed shipping and navigation methodology (completion of one NRA encompassing all three scenarios and two EIA chapters - one assessing Morven North in isolation and both sites concurrently and the other assessing Morven South in isolation and both sites concurrently) is suitable, noting that cumulative assessments will discuss all reasonable site build-out scenarios.	The feedback from MCA was acknowledged, with the approach to cumulative assessment has been laid out in Section 13.12 of Volume 2, Chapter 13: Shipping and Navigation.
Commercial Fisheries Consultation	12.12.2024	SFF	Email update to SFF	The Applicant consulted the SFF to revisit matters previously discussed in the February 2024 scoping response and to inform SFF of revised scoping of potential impacts within the fish and shellfish	Fisheries engagement in relation to Morven North and Morven South has been extensive and has involved Applicant-led

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				ecology assessment. The consultation aimed to check alignment between SFF's expectations and the technical conclusions of Morven North's and Morven South's EIA specialists, and to provide early updates ahead of a more detailed discussion scheduled for January 2025. The email was supported by a technical note on the revised scoping, provided ahead of, and to inform discussion with stakeholders in the meeting on 14 January 2025.	engagement with fishing industry representative bodies. Engagement is summarised in Section 12.4 of Volume 2, Chapter 12: Commercial Fisheries.
Pre-application engagement with Scottish Fisheries Stakeholders	14.01.2025	SWFPA SPFA SFF N&EC RIFG The Applicant CFLO	Virtual meeting	A meeting was held to update commercial fisheries stakeholders on the Applicant's updated consenting strategy, confirmed project will make two separate consent applications for Morven North and Morven South and to discuss fisheries-related topics within the EIA. It also aimed to gather feedback on data needs, potential fishing activity in the area, and future engagement requirements as the application progresses. Discussion of temporal coverage of the commercial fisheries baseline with SWFPA preference to see 10-years of baseline data presented. Concerns were raised about cable routing, potential impacts on fishing grounds, and the need for broader engagement with fleets operating beyond the immediate project area. • SWFPA identified potential for a return of a haddock fishery in the area around the Morven Site, targeting small haddock, in response to the emergence of processing facilities to support this fishery. Approach to baseline data gathering via issue of questionnaires proposed and discussed.	Feedback on fishing activity relevant to Morven North and Morven South has informed the baseline characterisation presented in Volume 3, Annex 12.1: Commercial Fisheries Technical Report. Regarding baseline temporal coverage, where data allows, a time series that exceeds five years has been presented. VMS and landings data covering at least a ten-year period has been used in describing the commercial fisheries baseline. Regarding reference to the potential emergence of a small haddock fishery, this is described and considered within the impact assessment presented in Section 12.11 of Volume 2, Chapter 12: Commercial Fisheries (paragraph 12.11.2.11). Fisheries engagement in relation to Morven North and Morven

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				• Fishing industry noted the need for broader engagement with fleets operating beyond the immediate project area. • Regarding the revised scoping of potential impacts within the fish and shellfish ecology assessment (see table row immediately above), no material feedback was received from stakeholders.	South has been extensive and has involved Applicant-led engagement with fishing industry representative bodies, public events and direct engagement with fishers via the appointed CFLO. Engagement is summarised in Section 13.5 of Volume 2, Chapter 13: Commercial Fisheries.
Offshore Ornithology Consultation - Ornithology Assessment - NatureScot Consultation Letter	28.01.2025	NatureScot	Email received (written advice)	In light of the revised consenting strategy to divide the Morven Site into Morven North and Morven South, the Applicant sought NatureScot's advice on its proposed approach to the offshore ornithology EIA and HRA assessments. The consultation (letter on 20 December 2024 and follow-up on 16 January 2025 and subsequent response from NatureScot on 17 March 2025) aimed to confirm whether NatureScot agreed with methods for baseline characterisation, data use, displacement modelling, collision risk, apportioning, migratory collision risk modelling, and PVA.	See subsections below for the Applicant's response to specific points in this consultation.
				NatureScot agreed with the approach to identifying Valued Ornithological Receptors (VORs). Confirmed proposed seasonal definitions (breeding vs non-breeding). Clarified that overlapping seasons should default to NatureScot breeding-season definitions; non-breeding seasons should follow Furness (2015).	The approach to identifying Valued Ornithological Receptors (VORs)has been set out in Section 11.7.3 of Volume 2, Chapter 11: Offshore Ornithology and in Chapter 3, Annex 11.1: Offshore Ornithology Baseline Characterisation Report, and was developed in line with NatureScot's pre-application advice. Seasonal definitions for all species have been provided in

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					Section 11.7.4 of Volume 2, Chapter 11: Offshore Ornithology, following the guidance received from NatureScot during consultation. The assessments presented in Volume 2, Chapter 11: Offshore Ornithology were undertaken following these agreed approaches.
				NatureScot supported the use of MRSea for density modelling, with design-based methods allowed where MRSea could not be applied. They agreed with the bootstrapping approach (1,000 iterations) for sCRM input data.	Collision risk modelling was carried out in accordance with the methodology detailed in Volume 3, Annex 11.2: Offshore Ornithology Collision Risk Modelling Report, following updated NatureScot guidance (NatureScot 2025b). Alternative parameter sources were also modelled, with justification provided as requested by MD-LOT.
				NatureScot agreed that the existing SeabORD version should be used when the CEF update was unavailable. They confirmed support for the displacement matrix approach. They advised applying displacement/mortality rates from Guidance Note 8 and noted that new research (e.g., ImpUDis) would inform future updates.	The approach and outcomes of SeabORD CRM for Morven North and Morven South has been presented in Chapter 3, Annex 11.5: Offshore Ornithology Displacement Modelling Report (SeabORD). In line with NatureScot's most recent advice (23 June 2025), the displacement matrix approach was used as the primary assessment method, as presented in Chapter 3, Annex 11.4: Offshore Ornithology Displacement Modelling Report (Matrix Approach), which followed
				NatureScot supported the proposed collision risk modelling approach. They expected the 2024 SNCB CRM guidance to be applied, with alternative parameters used only for comparison and with clear justification.	

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					the recommendations of NatureScot (2023f).
				NatureScot confirmed acceptance of the beta mCRM for migratory waterbirds. They agreed that the migratory-front approach was appropriate for seabirds such as skuas, terns, petrels, and little gulls.	The methodology and results for collision risk modelling of migratory waterbirds and seabirds have been presented in Chapter 3, Annex 11.3: Offshore Ornithology Collision Risk Modelling Report – Migratory and follows relevant NatureScot guidance.
				NatureScot supported the use of the 2020 interim guidance and Seabirds Count data. They recognised ongoing NEEOG work on puffin and were open to future discussion once results were available. They emphasised that puffin needed to be assessed in the non-breeding season due to DAS observations.	The apportioning methodology has been provided in Volume 2, Chapter 3.1: RIAA: Apportioning of the HRA, and has followed NatureScot's interim guidance, including the approach to distance measurement and the treatment of immature and sabbatical birds. Impacts on puffin were assessed in all relevant seasons within Sections 11.11 and 1.13 of Volume 2, Chapter 11: Offshore Ornithology, recognising that the anticipated new guidance on puffin in the non-breeding season had not yet been published and therefore could not be incorporated. Work exploring impacts on puffin in the non-breeding season is ongoing but was not completed in time for inclusion in the assessments presented in Volume 2, Chapter 3: RIAA: Part 3: SPA and Ramsar Site Assessments of the HRA.
				NatureScot confirmed that apportioning distances should have been measured from the geometric centre of the Morven North or Morven South Boundary to the geometric centre of the colony. NatureScot expressed reservations about ageing seabirds at sea due to identification challenges. They accepted the proposed approach only where identification rates were reliable and results were not less precautionary.	
				NatureScot required the removal of immatures and sabbatical birds during breeding-season apportioning. They specified adult-proportion values and sabbatical-rate requirements. They agreed with using stable age structures for guillemot in the non-breeding season and supported the use of Furness (2015) population data for other species.	

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				NatureScot agreed with the proposed NEPVA-based PVA approach and the 0.02 percentage-point threshold. They noted that updated demographic rates were forthcoming from JNCC. They confirmed that Morven North and Morven South needed to be treated as separate projects for project-alone PVA assessment. They advised that both projects had to be included in one another's in-combination assessment lists.	Population modelling was undertaken in accordance with NatureScot's guidance and the results were presented in Chapter 3, Annex 11.6: Offshore Ornithology Regional Population Viability Analysis. As Morven North and Morven South are separate projects, the threshold for determining whether cumulative or in-combination PVAs were required (i.e., impacts greater than 0.2 birds per annum) was applied individually to each project. Morven South was included within the cumulative assessment for Morven North where relevant (and vice versa), but the presence of one project did not influence the assessment thresholds applied to the other.
				NatureScot advised against using DAS data older than five years at the expected date of application submission. They stated that the earliest usable dataset depended on the application date: if submitted before March 2026, data from March 2021 onward could be used, and if later then data from October 2021 onward should be used. NatureScot confirmed that the Applicant held sufficient recent data to meet the guidance requirements.	Further discussion with NatureScot on seasonal extents and DAS data age took place during subsequent consultation, with an agreed approach confirmed in correspondence dated 14 April 2025.
Aviation (Military and Civil) Consultation -	29.01.2025	MOD Defence Infrastructur	Email received	The Applicant has engaged with the MOD DIO to seek clarity on whether Morven North and Morven South could affect any MOD highly surveyed routes. The Applicant contacted the MOD in March	The Applicant has scoped out impacts on highly surveyed routes from the assessment, as detailed in Section 15.5 of Volume 2,

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Highly Surveyed Routes		e Organisation (DIO)		2024 upon receipt of the MOD's Morven Site Scoping Opinion, which indicated that highly surveyed routes may exist in the vicinity of Morven North and Morven South, but could not be publicly described. The Applicant requested further information about these routes and sought and update on when the MOD's internal assessment could be completed. On 29 January 2025, the MOD confirmed that Morven North and Morven South did not impact any MOD highly surveyed routes, and that the MOD therefore had no concerns regarding Morven North and Morven South. The MOD also noted that any future export cable routes would need to be assessed separately.	Chapter 15: Aviation (Military and Civil).
Shipping and Navigation Consultation - Morven Site Update Drop-in Session	30.01.2025	MCA, NLB, RYA Scotland, Forth Ports TWP, SFF	Virtual meeting	The meeting was held to update MCA, NLB, RYA Scotland, Forth Ports, TWP and SFF on planned changes to the Morven Site. Specifically, an update was provided on the decision to split the project into Morven North and Morven South and sought feedback on wind turbine layout considerations, navigation implications, search-and-rescue (SAR) requirements, and the planned approach to NRA. • Forth Ports raised no concerns with Morven for vessels routeing to and from Forth Ports, with Berwick Bank being the most influential development for this vessel traffic. • The MCA noted that if the SAR lanes will be in a northwest/southeast bearing, additional navigation corridors would be required due to the overall length of the arrays. MCA highlighted the importance of ensuring the final array layout is compliant with MGN 654, including appropriate SAR	• The vessel routeing to and from Forth Ports has been addressed in Section 15.5 of Volume 3, Annex 13.1: Shipping and Navigation Shared Navigational Risk Assessment, including consideration of scenarios where Berwick Bank is present. • In line with the embedded mitigation commitments set out in Section 13.10 of Volume 2, Chapter 13: Shipping and Navigation, the final Morven North and Morven South wind turbine layout will be designed post-consent to ensure full compliance

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				access routes. The Applicant confirmed this would be addressed during final wind turbine layout discussions. • MCA acknowledged the cumulative routeing presented, which included anticipated future vessel route options and potential route deviations. No specific MCA-led objections were raised. • The NLB stated that it is feasible to have flexibility with the lighting and marking scheme for Morven North and Morven South depending on build out scenarios. • RYA Scotland noted that maximum buildout of both Morven North and Morven South would be worst-case for recreational vessels in the vicinity.	with MGN 654, including the provision for multiple lines of orientation to facilitate safe navigation and SAR access. Further consultation with MCA and other navigational stakeholders will take place prior to final wind turbine layout sign-off. • Indicative SAR access lanes based on the MDS layouts in Section 6.3.1 of Volume 3, Annex 13.1 have been produced, incorporating Helicopter Refuge Areas in response to MCA's SAR-related observations. • The embedded mitigation commitments outlined in Section 13.10 of Volume 2, Chapter 13: Shipping and Navigation also address the remaining MCA navigation and safety considerations, ensuring that hazard responses and mitigation measures align with the expectations raised during consultation. • Finally, maximum buildout has been used for internal allision modelling, ensuring a

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
					precautionary assessment consistent with MCA expectations for worst-case scenario evaluation.
Shipping and Navigation Consultation - Morven Site Update Drop-in Session	11.02.2025	UK CoS	Virtual meeting	The meeting was held to update the UK CoS on planned changes to the Morven Site. Specifically, an update was provided on the decision to split the project into Morven North and Morven South and feedback sought on wind turbine layout considerations, navigation implications, SAR requirements, and the planned approach to NRA. • The UK CoS confirmed that the developments included within the cumulative study area appropriately reflect both current and anticipated future influences on vessel routeing. • The UK CoS also highlighted the need for the assessment to consider vessel movements associated with towing rigs or transporting floating turbines for future offshore developments.	• The Applicant acknowledged the advice from the UK CoS, with the relevant offshore developments incorporated into the CEA in Section 13.13 of Volume 2, Chapter 13: Shipping and Navigation, ensuring that current and foreseeable influences on routeing are appropriately reflected. • To address the UK CoS's comments on future vessel activity, embedded mitigation measures intended to future-proof Morven North and Morven South for navigational safety are set out in Section 13.10 of Volume 2, Chapter 13: Shipping and Navigation. These include requirements for project vessels to comply with the Convention on the International Regulations for Preventing Collisions (COLREGs) (IMO,

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
					1972/77) and the implementation of robust marine coordination procedures. In response to the request to consider vessels towing rigs or floating turbines for future sites, the potential for increased towing-related vessel traffic has been examined in Section 13.7.2 of Volume 2, Chapter 13: Shipping and Navigation, ensuring that this type of marine activity is captured within the assessment.
HRA Derogation Consultation - Identification of Predator Control Measures	05.03.2025	NatureScot, MD-LOT	Virtual meeting	This meeting aimed to discuss the identification of VORs for Morven North and Morven South. The consultation sought feedback from NatureScot and MD-LOT on baseline offshore ornithology reports, seasonal definitions, cumulative impact assessment scenarios, and compensation measures. • NatureScot advised that cumulative impact assessment (CIA) scenarios must be agreed at the pre-application stage. They highlighted the need for clarity on whether Morven North and Morven South will be assessed individually or as a combined site and advised that the potential for double counting due to overlapping buffers should be considered.	A description of the surveys done undertaken to date, biosecurity planning, and monitoring is represented in Volume 3, Chapter 2: Compensation and Evidence Plan, of the HRA, with further details about the surveys in Volume 3, Chapter 2.5 and 2.6 and monitoring in Volume 3, Chapter 3: Outline Compensation Implementation, Monitoring and Adaptive Management Plan, of the HRA.

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				• NatureScot noted peaks in guillemot and razorbill abundance may relate to post-breeding dispersal. They advised reviewing fledging dates and considering adjustments to seasonal definitions, such as adding a post-breeding dispersal period. • NatureScot acknowledged predator eradication could be beneficial but emphasised the need for detailed surveys, biosecurity planning, and monitoring. They encouraged early consultation on shortlisted islands and other measures like seagrass restoration or marine litter removal, while noting strategic alignment with plan-level compensation is still uncertain.	
Offshore Ornithology Consultation - razorbill and guillemot assessment methods	07.03.2025	Natural England	Email issued (Letter)	The Applicant consulted on Natural England's response to the Morven Site Scoping Report, Natural England recommended that, in relation to guillemot and razorbill: "Where there is uncertainty over species identification, Natural England advises that two scenarios are carried through the assessment: 1) that birds identified to "razorbill or guillemot" are assessed as razorbill and 2) that birds identified to "razorbill or guillemot" are assessed as guillemot." • The Applicant advised that applying Natural England's dual-scenario method would substantially overestimate impacts, particularly for razorbill, due to the high proportions of guillemot in the dataset. • The Applicant outlined that the ratio-based approach has a long history of application in offshore wind EIAs, aligns with	The Applicant outlines the ratio-based approach in Volume 3, Annex 11.1: Offshore Ornithology Baseline Characterisation Report. The Applicant has not applied Natural England's requested two-scenario method for unidentified auks. Instead, ratio-based approach, has been applied consistent with established practice, NatureScot's advice, and methods already accepted by Natural England for comparable projects.

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				NatureScot guidance, and has been accepted by Natural England previously (e.g., Mona and Morgan). • The Applicant confirmed that additional processing of DAS data had been undertaken to improve identification rates, ensuring suitability for the ratio-based method.	
Offshore Ornithology Consultation - NatureScot Consultation Letter (December 2024)	05.03.2025	NatureScot, MD-LOT	Virtual meeting	This meeting aimed to discuss the identification of VORs for Morven North and Morven South. The consultation sought feedback from NatureScot and MD-LOT on baseline characterisation, seasonal definitions, and cumulative scenarios. • NatureScot advised that the most contemporaneous counts should be used for regional populations, colony counts and seabird data. The DAS timings (2021 to 2023) will align with many of the colony counts in the Seabirds Count census (2015 to 2021). Where a Seabirds Count colony count date does not align with DAS (counts from 2013 to 2020), an updated count from the Seabird Monitoring Programme database that is most contemporaneous with the DAS should be used where possible, to align colony counts with the snapshot of birds recorded in the DAS. • NatureScot further advised to use recent counts such as the RSPB work after the HPAI outbreak, to provide more context to population importance classification and an indication of whether colonies are decreasing or increasing after HPAI outbreaks.	• Following NatureScot's advice, the most contemporaneous population counts have been used throughout Volume 2, Chapter 11: Offshore Ornithology and in all relevant supporting technical annexes. The potential effects of HPAI on species relevant to Morven North and Morven South have been considered in Section 11.7.8 of Volume 2, Chapter 11: Offshore Ornithology and incorporated into the assessments in Section 11.11 of Volume 2, Chapter 11: Offshore Ornithology through each species' recoverability, as defined in Table 11.21 of Volume 2, Chapter 11: Offshore Ornithology, and in Volume 3, Annex 11.1: Offshore Ornithology

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				• NatureScot confirmed that the results from VOR identification during baseline characterisation presented were acceptable. NatureScot requested the inclusion of terns. The Applicant confirmed that terns and petrels would be included in the migratory CRM report and that further screening would be undertaken based on the corridors defined in WWT and MacArthur Green (2014). • The Applicant presented information concerning auk seasonal definitions, with peak abundances of common guillemot and razorbill being towards the end of the breeding season seasonal definitions. • NatureScot confirmed it would be valuable to review fledging dates at nearby colonies to determine whether these peaks related to post-breeding dispersal. NatureScot advised that if the peak was found to relate to post-breeding dispersal, that the Applicant should consider a post-breeding dispersal period as a separate season for common guillemot, and extend the post-breeding season for razorbill to include earlier months. • NatureScot advised further consultation would be valuable to confirm the influence on seasonal definitions for common guillemot and razorbill.	Baseline Characterisation Report. Details of the methodology for identifying VORs is provided in Chapter 3, Annex 11.1: Offshore Ornithology Baseline Characterisation Report, and species included within each impact assessment are detailed in Annex 11.2: Offshore Ornithology Collision Risk Modelling Report, Annex 11.3: Offshore Ornithology Collision Risk Modelling Report: Migratory and Annex 11.4: Offshore Ornithology Displacement Modelling Report (Matrix Approach). • In response to NatureScot's request for clarification on seasonal extents for common guillemot and razorbill, the Applicant provided additional information, with NatureScot issuing a further response on 14 April 2025, and an agreed approach subsequently confirmed on 28 May 2025, as detailed within this table below.

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CEA Consultation - targeted Consultation Letter	13.03.2025	MD-LOT	Email issued (Letter)	The Applicant shared a targeted consultation letter for Morven North and Morven South setting out the details of the revised consenting strategy for the Morven North and Morven South following the division of the Morven Site into two distinct projects. The letter confirmed that further Scoping Reports would not be submitted and detailed the Applicant's proposed approach for EIA and HRA (including the proposed approach to cumulative and in-combination assessment), MPA assessment, and presented the topic-specific study areas that would be considered for each of Morven North and Morven South. The letter requested feedback from MD-LOT on the proposed approach and any additional considerations.	MD-LOT responded to the targeted consultation latter on 21 July 2025 as detailed below.
Marine Mammals Consultation - NatureScot Consultation Letter (December 2024)	17.03.2025	NatureScot	Email received	The Applicant consulted NatureScot on 20 December 2024 to confirm its proposed approaches for the offshore ornithology assessments for Morven North and Morven South. On 11 March 2025, the Applicant additionally asked whether all 33 months of DAS data could be used for marine mammal baseline characterisation, and NatureScot confirmed this was acceptable, advising the use of precautionary density estimates and, for seals, the Carter *et al.* (2022) usage maps.	Precautionary density estimates for seals (Carter *et al.*, 2022) were used in Section 10.4.1 of Volume 2, Chapter 10: Marine Mammals.
HRA Derogation - proposed predator eradication survey work consultation	21.03.2025	NatureScot	Email received	The Applicant consulted NatureScot to confirm the seasonal classification for common guillemot and razorbill in distributional response assessments and to discuss proposed summer colony count and habitat surveys at shortlisted islands for potential predator eradication as compensation measures. • NatureScot agreed with the Applicant's proposal to classify August as part of the	The seasonal classification for common guillemot and razorbill in distributional response assessments is presented in Volume 2, Chapter 3.1: RIAA Apportioning. Additionally, a description of the surveys done to date, biosecurity planning, and monitoring is represented in

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				non-breeding season, noting this was supported by Isle of May data and the absence of additional fledging data from nearby colonies. • NatureScot confirmed agreement with the seasonal classification proposal.	Volume 3, Chapter 2: Compensation Plan of the HRA with further details about the survey in Volume 3, Chapter 2.5 and 2.6 and monitoring in Volume 3, Chapter 3: Outline Compensation Implementation, Monitoring and Adaptive Management Plan of the HRA.
Physical Processes Consultation - post Physical Processes Stratification Method Statement	27.03.2025	MD-SEDD (via MD-LOT)	Email received	On 11 June 2025, The Applicant consulted MD-SEDD to seek advice on its proposed MIKE 3 high-level 3D modelling approach for assessing seasonal stratification effects during peak summer, including the use of cloud computing to manage runtimes, the assumption of constant temperature and salinity inputs, and the expectation that secondary scour would remain minimal due to conservative scour-protection design, with cable burial guided by risk assessments and post-construction monitoring addressing any residual effects. • MD-SEDD advised that, in general, the refinements to the computational mesh and vertical resolution are pragmatic and welcomed the sensitivity analysis undertaken. It was queried if additional turbulence generated by the structures would be adequately represented by the parameterisation method, however acknowledged that the high horizontal resolution may compensate. • MD-SEDD accepted the proposal for an idealised approach with static boundary forcing for the proposed short model run	A high-level 3D modelling study to assess the impact on seasonal stratification has been undertaken following consultation with MD-LOT and MD-SEDD. The modelling study is discussed within Volume 3, Annex 7.1: Physical Processes Shared Technical Report. The assessment of the impact on seasonal stratification is discussed under Section 7.11.6 of Volume 2, Chapter 7: Physical Processes.

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				and accepted the absence of atmospheric forcing in the modelling. • MD-SEDD advised that an analysis should be performed on the SSW-RS data to identify a typical year from which to simulate model. • MD-SEDD also advised that peak summer and onset periods should be modelled over a spring neap cycle in addition to model warm up time.	
Offshore Ornithology Consultation - Auk non-breeding season	14.04.2025	NatureScot	Email received	The Applicant consulted NatureScot to confirm the appropriate seasonal definitions for common guillemot and razorbill, particularly how to classify July and August within the breeding, post-breeding, and non-breeding periods. • NatureScot noted that predicted impacts for common guillemot were driven by higher populations in July and August. The Applicant had defined a post-breeding season for common guillemot following previous NatureScot advice and had applied the same apportioning in the post-breeding season as advised for the non-breeding season. • NatureScot confirmed that July should be incorporated into the post-breeding season for common guillemot due to the high populations recorded during site specific surveys. NatureScot agreed with the application of the apportioning approach in the non-breeding season to the post-breeding season. • NatureScot supported the alternative seasonal-definition approach presented by	NatureScot's advice on defining seasonal extents for common guillemot and razorbill has been considered throughout Volume 2, Chapter 11: Offshore Ornithology (particularly Section 11.11) and in the supporting technical annex, including Chapter 3, Annex 11.4: Offshore Ornithology Displacement Modelling Report (Matrix Approach), with seasons defined according to the likely presence of post-breeding birds. Additional consultation on this matter took place on 28 May 2025, during which an agreed approach was agreed on treating July as part of the post-breeding season for guillemot and using the non-breeding apportioning approach in the assessments. The Applicant has also followed NatureScot's advice in relation to seasonal definitions for common guillemot throughout Volume 2,

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				the Applicant and requested a worked comparison of methods at the pre-application stage. • NatureScot noted that peak late-season abundances of common guillemot and razorbill at Morven North and Morven South may reflect post-breeding dispersal. • For common guillemot, NatureScot advised two acceptable options: (1) Treat August as part of the non-breeding season, or (2) Treat July and August as a distinct post-breeding period, using DAS peak abundance estimates. • For razorbill, NatureScot recommended extending the post-breeding season to include any months in which DAS recorded peak abundance. • NatureScot accepted that, under option (2), common guillemot would not require a RIAA assessment for the post-breeding period and should instead be addressed through the EIA, including commentary and mitigation hierarchy if impacts were significant. • NatureScot agreed to the inclusion of DAS data from September 2021 in displacement analyses. • NatureScot also confirmed that DAS data from July and August 2021 may be included where those months are classified as part of the non-breeding or post-breeding seasons for common guillemot or razorbill, to ensure complete seasonal datasets.	Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments of the HRA.

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ScotWind East Region CFWG meeting	07.05.2025	SFF SWFPA East region ScotWind developers.	Face to Face meeting	The CFWG held their second meeting to maintain structured dialogue between offshore wind developers and the fishing industry, ensuring that upcoming ScotWind projects and their potential impacts on fisheries were openly discussed and managed. The Applicant presented an overview of Morven North and Morven South, including the rationale for the split of the Morven Site into Morven North and Morven South, mainly due to ongoing uncertainty around grid-connection timelines. Whilst the consenting strategy changed, the overall design and proposed infrastructure within the Morven Site remains the same. The SWFPA expressed concerns regarding the use of questionnaires as they add pressure to fishers' workloads.	The Applicant remains committed to continued participation in the East Region CFWG and with the fishing industry as a whole as summarised in this Annex. The Applicant notes the feedback on the use of questionnaires. Responses to questionnaires issued on 17 April 2025 were used to validate the baseline, which is described based on a wide range of data sources, as presented in Volume 3, Annex 12.1: Commercial Fisheries Technical Report.
HRA Derogation Consultation	16.05.2025	NatureScot	Email received	The Applicant consulted NatureScot to ensure the proposed surveys would provide sufficient evidence to justify the effectiveness of predator removal for seabird conservation. The Applicant also sought advice on timing and techniques for stable isotope analysis and other diet assessment methods. • NatureScot welcomed the high standard of the proposed scope and early baseline data collection but emphasised two critical considerations: assessing habitat accessibility for predators and gathering direct evidence of predation on seabirds. NatureScot recommended incorporating high-resolution photographs into the June surveys to calculate accessible cliff habitat and suggested stable isotope	The Applicant agreed to adjust the timing and scope of feasibility studies to address these concerns, including earlier surveys, enhanced photographic analysis, and consideration of isotope and eDNA methods. A description of the surveys done completed to date, biosecurity planning, and monitoring is represented in Volume 3, Chapter 2: Compensation Plan of the HRA with further details about the survey in Volume 3, Chapter Annexes 2.5 and 2.6 of the HRA.

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				analysis as a potential method for confirming seabird predation, noting timing is crucial for meaningful results (response on 16.05. May 2025). • NatureScot highlighted that previous eradication projects are not directly comparable because compensation measures require stronger evidence of effectiveness. They stressed that global assumptions about rat predation need site specific validation, especially for cliff-nesting species.	
HRA Derogation Consultation	19.05.2025	NatureScot	Email received	The Applicant consulted NatureScot for any seagrass or similar habitat restoration projects around the Scottish coastline that have not yet secured funding, particularly those previously considered by Scottish Marine Environmental Enhancement Fund (SMEEF) but not progressed. • NatureScot confirmed they are currently exploring more seagrass restoration projects but do not have a list of active projects available to share.	Short list measures for seagrass restoration (and other measures) are presented in Volume 3, Chapter 2: Compensation Plan, Section 3.5 of the HRA.
HRA Derogation Consultation	28.05.2025	NatureScot, MD-LOT	Virtual meeting	The meeting aimed to review ongoing work on compensation measures for the Morven North and Morven South, focusing on predator eradication as the primary measure. It also sought feedback on other shortlisted measures, discuss preliminary impact modelling, and agree on next steps for engagement later in the year. • NatureScot supported treating July as part of the post-breeding season for common guillemot and agreed with using the non-breeding apportioning approach in	Advice provided has been incorporated into the Compensation Plan (Volume 3, Chapter 2: Compensation Plan). A further meeting was held with NatureScot on 18 August 2025 where the approach to CEA was agreed. The Applicant has followed NatureScot's advice in relation to seasonal definitions for guillemot throughout Volume 2, Chapter 3: RIAA Part 3: SPA and

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				assessments. They emphasised the need for a dedicated session on in-combination assessments and flagged emerging policy changes that could influence compensation planning. • NatureScot welcomed predator eradication as a primary measure but stressed the importance of gathering evidence on rat predation and habitat accessibility. They noted that previous eradication projects are not directly comparable and requested robust site specific-specific data to justify compensation levels. • The Applicant outlined plans for June colony counts and feasibility studies on Rum and Muck, including habitat mapping and potential use of thermal drones. They committed to sharing modelling outputs and incorporating NatureScot's feedback on evidence requirements. Both parties discussed supportive measures such as seaweed cultivation, fisheries bycatch reduction, sandeel closures, and habitat restoration. NatureScot expressed interest but highlighted that some concepts (e.g., seaweed farming) require more evidence before formal support can be given.	Ramsar Site Assessments of the HRA.
Offshore Ornithology Consultation - cumulative displacement	23.06.2025	NatureScot, MD-LOT	Email issued (Letter)	On 28 May 2025, the Applicant consulted NatureScot and MD-LOT to confirm the appropriate cumulative and in-combination displacement assessment approach for the Morven North and Morven South offshore ornithology assessments. Because the two projects lie adjacent to one	Further consultation with NatureScot took place on 01 August 2025 in which NatureScot confirmed and clarified the final cumulative and in-combination scenarios approach with the

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assessment Letter				another, the 2km displacement buffers overlap, leading to double-counting of peak population estimates. The Applicant therefore proposed a method to calculate displacement for the whole Morven Site and then adjust project-level estimates to ensure accurate apportioning for each project. • NatureScot requested consideration of three separate cumulative/in-combination scenarios due to the potential for different development timelines: (1) Morven North + other relevant projects (2) Morven South + other relevant projects (3) Morven Site + other relevant projects. • NatureScot noted that a CEA for the Morven Site is acceptable but must not be the only scenario considered. • NatureScot supported the Applicant's proposal to apply different apportioning values to Morven North and Morven South for the RIAA, agreeing that it would not be accurate to apportion impacts using values derived from the Morven Site alone. • NatureScot acknowledged the spatial overlap of the 2km buffers and accepted the Applicant's proposed method for removing double-counted mean-peak population estimates by calculating peak populations for each project and the Morven Site; identifying the overlapping component; reallocating the overlap proportionately to each project. NatureScot confirmed that this approach was logical and acceptable.	Applicant. The Applicant further considered the approach to cumulative and in-combination assessments and took the approach to add the impacts from Morven North and Morven South together rather than apply the methodology previously proposed, accepting that this will represent an overestimate of the potential impact on a cumulative and in-combination basis. Results of the Morven Programme assessment have been provided in Section 11.13 of Volume 2, Chapter 11: Offshore Ornithology.

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				• NatureScot noted that the original Morven Site had been divided into Morven North and Morven South but stressed that in-combination assessment must reflect the possibility of the projects being built individually, concurrently, or sequentially.	
Offshore Ornithology Consultation - SeabORD Report	23.06.2025	NatureScot	Email received	On 9 June 2025, the Applicant shared the draft SeabORD displacement modelling report for Morven North with NatureScot and requested advice on whether SeabORD outputs should be included in the application and used for displacement assessment, or whether the matrix approach should remain the primary method. • NatureScot advised that their current advice with respect to the MATLAB version of the SeabORD model is that, where feasible, SeabORD outputs should be presented to provide additional context to the displacement assessment, but confirmed the matrix approach should be used as the main assessment method for all species and seasons	The SeabORD modelling approach included methodology applied and outputs obtained is provided for additional context in Volume 3, Annex 11.5: Offshore Ornithology Displacement Modelling Report (SeabORD).
Pre-application engagement with Scottish Fisheries Stakeholders	24.06.2025	SWFPA SFF N&EC RIFG SPFA	Baseline characterisation meeting (Virtual meeting)	The Applicant met with SFF and SWFPA, to further present the commercial fisheries baseline for Morven North and Morven South. The purpose was to share the findings of the data-gathering exercise (including questionnaire responses and demersal trawl fishing grounds across a nine-year period), confirm that the baseline accurately reflected fishing operations in the area, and provide a final opportunity for stakeholders to contribute additional information before progressing with EIA assessments. • SWFPA expressed concern about the low number of completed questionnaires and	Feedback from SFF and SWFPA on fishing activity relevant to Morven North and Morven South has been incorporated into the baseline characterisation presented in Volume 3, Annex 12.1: Commercial Fisheries Technical Report. Responses received from issued stakeholder questionnaires were used to validate the baseline, which draws on a wide range of data sources. To address concerns regarding

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				questioned their relevance for representing commercial fishing activity. • SWFPA stated that relying on a five-year dataset would not accurately reflect fishing activity due to Brexit and Covid-related impacts on the small haddock market, which affected fishing patterns during that period. • SWFPA reported that their plotter shot data shows ongoing fishing activity within both Morven North and Morven South, highlighting that activity may be under-represented in the dataset presented. • Stakeholders reviewed the baseline, which included outcomes of the questionnaire exercise and nine-year demersal trawl fishing-ground data, and were invited to identify any additional information sources.	baseline temporal coverage, where data allows, a time series exceeding five years has been presented. While not all commercial fisheries data types allow for ten-year coverage, core VMS and landings data extending over at least ten years have been used to describe the commercial fisheries baseline, supplemented by additional data types where longer time series were not available. The Applicant also concurs that SFF-provided vessel plotter data indicates the presence of some fishing activity within the Morven Site. The VMS data indicates that activity levels are relatively low within the context of the Morven North and Morven South Local and Regional Commercial Fisheries Study Areas.
CEA Consultation	01.07.2025	NatureScot	Email received	The Applicant sought to clarify whether NatureScot's comments on 26 June 2025 regarding cumulative and in-combination scenarios in response to consultation on the proposed cumulative displacement modelling approach should also be considered to apply across all receptors and impacts within the EIA Report and HRA. • NatureScot responded indicating that three cumulative/in-combination scenarios should be assessed across all	The Applicant acknowledged the advice from NatureScot and further engagement on this matter took place on 18 August 2025 (detailed in this table below). The subsequently agreed whole project, Morven Programme and CEA approach has been set out in Section 6.5 of Volume 1, Chapter 6: EIA Methodology. Topic assessment chapters (Volume 2, Chapter 7 to 20) have followed the

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				receptors and impacts in both the EIA and HRA: – Morven North + other relevant projects – Morven South + other relevant projects – Morven North + Morven South + other relevant projects • NatureScot clarified that these scenarios would be required because Morven North and Morven South may be developed in isolation, concurrently, or sequentially, and each required a standalone assessment that could be considered independently during the consenting process. • NatureScot noted that, because cable routes had not yet been allocated to either Morven North or Morven South, it was suggested that both cable routes be included in all three cumulative and in-combination scenarios. • NatureScot emphasised that Scenario 1 and Scenario 2 would ensure that stakeholders can assess the potential cumulative impacts of each project as a standalone development, while Scenario 3 would enable assessment of the full Morven Programme when considered together. • In response to the Applicant's query about increased complexity and consistency with other ScotWind projects, NatureScot reiterated that the request for three scenarios had arisen due to Morven North and Morven South having separate applications.	approach set out in Volume 1, Chapter 6: EIA Methodology.

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Offshore Ornithology Consultation - Morven fulmar impact pathway assessment	11.07.2025	NatureScot	Email received	The Applicant consulted NatureScot to clarify which impact pathways should be assessed for fulmar within the offshore ornithology assessment. the Applicant sought confirmation which impacts should be considered for fulmar in light of recent offshore wind projects applying different approaches. • NatureScot welcomed the Applicant's intention to include fulmar in the assessment. • NatureScot noted that fulmar should be assessed for displacement, with a 20% displacement rate and 1 to 3% mortality rate, following parameters previously recommended for the West of Orkney Windfarm. • NatureScot advised that a quantitative assessment of distributional responses is preferred, given emerging inclusion of fulmar in recent assessments due to proximity to breeding colonies and potential barrier effects. Attraction to artificial light should be assessed, based on high nocturnal activity scores (e.g., Bradbury *et al.* 2014; Wade *et al.* 2016), and due to increasing relevance from cumulative offshore wind development on the east coast. • NatureScot noted that collision risk does not need to be assessed, as fulmar have very low vulnerability to collision. • NatureScot advised that impacts from accidental pollution and indirect effects on prey availability should be considered for all seabird species with connectivity to	Potential impacts from displacement and attraction to light have been considered for fulmar in Section 11.11.8 of Volume 2, Chapter 11: Offshore Ornithology and Volume 3, Annex 11.4: Offshore Ornithology Displacement Modelling Report (Matrix Approach). Potential impacts from displacement and attraction to light have been considered in Volume 2, Chapter 1: RIAA Part 1: Introduction of the HRA and considered for fulmar in Section 5 of Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments of the HRA.

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				Morven North and Morven South, including fulmar. • NatureScot noted that cumulative displacement assessment for fulmar may be limited, as fulmar have not commonly been included in cumulative assessments for other offshore wind applications.	
Aviation Consultation	17.07.2025	Meteorological Office	Email received (Letter issued on the 10.07.2025)	On 10 July 2025, Sagentia Aviation, on behalf of the Applicant, consulted the Met Office to request expert advice on whether the Morven North and Morven South could affect the Hill of Dudwick weather radar. They provided project details, referenced relevant national policy on radar safeguarding (in form of a letter), and invited the Met Office to review the potential for turbine-related interference with meteorological data. • The Met Office confirmed that Morven North and Morven South will not interfere with Hill of Dudwick weather radar operations. • They explained that at Morven North and Morven South distances (approx. 81.5km to 116.2km), the base of the radar beam sits between 577m and 980m above sea level, meaning all turbines would be below the radar beam. • As a result, the turbines will have no impact on radar data or weather-warning services. • The Met Office stated they have no concerns regarding the proposal and wished the Applicant success.	The feedback from Met Office is presented in Section 15.5 of Volume 2, Chapter 15: Aviation (Military and Civil) for impacts scoped in and out of the assessment.

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Consenting strategy and CEA Consultation - targeted consultation letter	21.07.2025	MD-LOT	Email received	MD-LOT confirmed that they had reviewed the information contained in the 13 March 2025 targeted consultation letter and noted the Applicant's proposed way forward. MD-LOT confirmed that there were no additional aspects for the Applicant to consider, however advised that the Applicant continue discussions with NatureScot regarding cumulative and in-combination assessment approach.	The EIA chapters (Volume 2, Chapter 7 to 20), technical reports (Volume 3, Annexes 5 to 18.3, including Appendices), RIAA (Volume 2 of the HRA), and the Morven North MPA assessment have been prepared following the approach set out in the 13 March 2025 targeted consultation letter. The cumulative and in-combination approach was further discussed and agreed in subsequent consultation with NatureScot as detailed below (see consultation on 18 August 2025).
Consultation - Management Plans	21.07.2025	MD-LOT	Email received	At the 06 November 2024 quarterly meeting, the Applicant presented a proposed list of mitigation and monitoring plans, indicating which plans would be submitted: pre- and post-consent. It was also discussed if shared management plans for Morven North and Morven South would be acceptable. • On 21 July 2025 MD-LOT followed up to confirm agreement with the proposed approach to and post-consent plans and requested that the appropriate level of detail is provided at the application stage, such that would enable stakeholders to have early sight of the plans and the opportunity to comment at that stage. • MD-LOT highlighted recently published MD-LOT guidance on mitigation and monitoring plans which must be submitted at application stage.	Mitigation and monitoring plans presented in Volume 4 of the EIA are aligned with the list of plans agreed with MD-LOT and requirements of MD-LOT guidance (MD-LOT, 2025). Details of plans proposed to be provided post-consent are set out within Volume 3, Annex 6.3: EIA Commitments Register.

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CEA Consultation - cut off dates for inclusion of new or updated information for assessment of third-party projects, plans and activities	21.07.2025	MD-LOT	Email received	The Applicant requested advice from MD-LOT on 06 December 2024 regarding cut off dates for the CEA, proposing the consideration of new or updated information for third party projects, plans and activities in the public domain within six months of application submission for quantitative assessments and within three months for qualitative assessments. • MD-LOT responded on 21 July 2025 confirming agreement with the Applicant's proposed cut-off dates for the consideration of new or updated information for plans projects and activities.	Cut-off dates for the qualitative and quantitative assessments have been implemented throughout assessments as set out in paragraph 6.5.5.9 of Volume 1, Chapter 6: EIA Methodology.
HRA re-screening Consultation	30.07.2025	NatureScot	Letter (email response on 19 August 2025)	The Applicant sent a consultation letter to NatureScot regarding the HRA re-screening for Morven North and Morven South. The letter set out the updated Stage 1 Likely Significant Effects (LSE[2]) re-screening for both Morven North and Morven South, reaffirming the use of the same methodology from the 2023 screening report while incorporating newer guidance, survey data, and NatureScot's 28 January 2025 advice, particularly regarding guillemot and fulmar. The Applicant explained that for guillemot, connectivity screening followed NatureScot's guidance using MMFR +1SD (95.2km), but that apportioning was undertaken using distances from the project centre to individual colony locations from Seabirds Count, concluding that Morven South lay outside the foraging range of guillemot from Fowlsheugh SPA, and therefore no breeding-season guillemot impacts were apportioned to any SPA. See	The Volume 2, Chapter 2: RIAA Part 2: SAC Assessments and Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments, of the HRA incorporates all SACs, SPAs and associated qualifying features for which LSE[2] was identified in the Volume 2, Chapter 1: RIAA: HRA Stage 1 Screening Report, of the HRA. NatureScot responded regarding the guillemot assessment and apportioning approach on 19 August 2025. See 19 August 2025 entry below for detail of further engagement on this matter.

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				19 August 2025 entry below for details of further engagement on this matter.	
CEA Consultation - cumulative scenarios	18.08.2025	MD-LOT	Virtual meeting	NatureScot and MD-LOT agreed to refinements to the whole project, Morven Programme and CEA approach initially set out set out within the targeted consultation letter sent by the Applicant dated 13 March 2025. To allow each of the Morven North and Morven South consent applications to be considered independently, NatureScot and the Applicant agreed that cumulative assessment should consider the potential effects of Morven North (or Morven South) together with other projects, plans and activities (including other components of the Morven Programme alongside other tiered projects), rather than the consideration of Morven Programme impacts together with third party projects, plans and activities. It was also agreed that the Morven Programme assessment would only be required for offshore ornithology and shipping and navigation receptors as supplementary information to accompany the CEA.	The whole project, Morven Programme and CEA approach is set out in Section 1.5 of Volume 1, Chapter 6: EIA Methodology and has been applied for all topic assessment chapters in Volume 2 of the EIA as well as within the RIAA.
Offshore Ornithology - HRA re-screening	19.08.2025	NatureScot	Email received	NatureScot responded by email to the consultation letter on HRA re-screening on 30 July 2025 (as detailed above). • NatureScot clarified that connectivity and apportioning use different distance measures: edge-to-edge for LSE[2] screening and centre-to-centre for apportioning, as per guidance. • For LSE[2] screening, NatureScot noted that the Applicant's proposed distance measurement approach to determine	To enable NatureScot to provide further advice on this matter, the Applicant responded to NatureScot's email with a further letter on 19 September 2025, to which NatureScot responded on 29 September 2025. See further details under 29 September 2025 entry below.

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				connectivity was in accordance with their guidance. • For apportioning, NatureScot queried the Applicant's proposed use of a distance measured from the centre of the project to the centre of the SPA. NatureScot noted their position that apportioning values should be assigned to all SPAs for which connectivity has been identified. • NatureScot noted confusion for offshore proposals near the MMFR +1SD range, and advised a bespoke approach where necessary, which could potentially involve increasing the foraging distance so that all SPAs with connectivity are receive an apportioned impact based on a centre to centre measurement. • NatureScot suggested that the Applicant could provide the apportioning spreadsheet or arrange a call to discuss the methodology further to enable them to provide further advice.	
Marine Archaeology Consultation - HES	28.08.2025	MD-LOT, HES	Email received (Letter)	The Applicant contacted HES to request advice on the potential impact of the Morven North and Morven South on deeply buried marine archaeology receptors, to support preparation of the marine archaeology sections of the EIA. The Applicant explained that some impacts were proposed to be scoped out for the O&M and decommissioning phases and sought HES's agreement to this change. Further correspondence on 28 August 2025 reiterated this request and sought clarification on HES's role following recent changes to its remit.	The consultation letter was sent on to MD-LOT on 28 August 2025. MD-LOT confirmed on 19 January 2026 at the quarterly meeting that this was under consideration, however no further response had been received at time of submission. This does not alter the outcome of the assessment presented in Section 14.11 of Volume 2, Chapter 14: Marine Archaeology.

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				• HES confirmed that it no longer provides advice on undesignated underwater cultural heritage, aligning its marine role with its land-based remit. They only provide such advice when explicitly requested by MD-LOT or where existing conditions require their involvement. • HES stated they could respond directly to the Applicant's request and would only provide the required archaeological advice once MD-LOT formally requests it.	
Other Sea Users Consultation - JRC	18.09.2025	Joint Research Centre (JRC)	Email received	On 24 April 2025, the Applicant notified JRC of the updated consenting strategy, splitting the Morven Site into Morven North and Morven South, seeking confirmation from JRC that Morven North and Morven South did not have the potential to affect microwave communication links and that impacts on microwave communication infrastructure could be scoped out of the EIA. The JRC provided a response on 26 August 2025 confirming clearance in principle for Morven North and Morven South, however this would be subject to 50m micro siting and receipt of turbine location coordinates. The Applicant sent an email on 08 September 2025 providing: indicative wind turbine layouts for all options covered in the Project Design Envelope (PDE) and Morven North and Morven South site boundary files; clarification on the approach to assessment, which is based on an MDS within the PDE with the potential to result in the greatest impact on a particular topic receptor; details of the maximum design parameters for each option within the PDE. The Applicant requested confirmation that the indicative wind turbine layout	The Applicant notes JRC's response and welcomes the scoping out of offshore microwave links, as noted in Volume 2, Chapter 16: Other Sea Users and Communications.

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				data provided did not alter JRC's previous assessment with regard to the lack of impact of Morven North and Morven South on their networks. The Applicant noted that while the maximum design parameters have been defined and form the basis of the assessment, engineering input is still required, and final precise wind turbine locations will only be available following detailed design work post consent. JRC provided confirmation in email on 18 September 2025 that the project design envelopes for Morven North and Morven South do not impact on JRC's protected links and their previous clearance still stands.	
Offshore Ornithology Consultation - consideration of compensated effects within cumulative and in-combination assessments	26.09.2025	NatureScot, MD-Lot	Email received	The Applicant consulted NatureScot and MD-LOT to request advice on whether Berwick Bank Offshore Wind Farm should be excluded from the in-combination assessment for species and designated sites where compensatory measures are required. The Applicant noted recent Appropriate Assessment outcomes by Scottish Ministers and proposed that Berwick Bank be included only for receptors where no adverse effect on site integrity had been concluded. They also asked whether the same principle should apply to other projects requiring compensation (e.g., West of Orkney, Green Volt, Salamander, and relevant English projects). • Regarding Berwick Bank, NatureScot noted that although consent had been granted, the compensation plan has not yet been finalised, and therefore MD-LOT is best placed to advise on whether and how Berwick Bank should be included in in-combination assessments.	Consideration is given to those projects for which compensation measures have been applied throughout Section 5.5 of Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments, of the HRA.

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				• MD-LOT stated that the question of Berwick Bank's inclusion in in-combination assessments is under active consideration, with further guidance to follow.	
Offshore Ornithology - HRA re-screening	29.09.2025	NatureScot	Email received	On 19 September 2025, the Applicant issued a letter responding to NatureScot's previous request for further information on the apportioning approach (as noted in the 19 August 2025 entry above). NatureScot responded by letter on 29 September 2025. • NatureScot reviewed the Applicant's conclusion that no breeding season guillemot impacts from Morven South would be apportioned to SPAs and raised concerns. Specifically, they requested clarification on the apportioning distances used, the definition of "individual colony locations," and noted that their own measurements show distances only slightly greater than the MMFR +1SD (95.2 km). • NatureScot emphasised that prescriptive use of MMFR +1SD is not biologically realistic, as actual foraging ranges vary with conditions and prey availability. They stated it is unrealistic to assume breeding birds will not cross boundaries between Morven North and Morven South and highlighted that guillemot recorded in Morven South are likely to include SPA breeding birds. • NatureScot referenced DAS data showing presence of guillemot within the Morven Site during the breeding season and flight	A follow up consultation meeting was held with NatureScot on the 23 October 2025 to discuss apportioning approach in the breeding and non-breeding seasons (see further detail in 23 October 2025 entry below).

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				directions indicating movement toward Morven South. This supports the potential for SPA connectivity with Morven South. • For the non-breeding season, NatureScot advised that guillemot remain near breeding colonies and recommended using foraging ranges rather than BDMPS for population derivation, pending resolution of breeding season queries. NatureScot asked for further clarification before providing advice on non-breeding season assessments and suggested a meeting to resolve outstanding issues.	
Management Plan Consultation - Quarterly MD-LOT meeting	29.09.2025	NatureScot	Email received	At the quarterly MD-LOT meeting (06 November 2024) NatureScot confirmed that they would support the development of a Biodiversity Enhancement Plan or Nature Positive Impact Plan as part of the consent applications for Morven North and Morven South. During the 29 September 2025 quarterly MD-LOT meeting, the Applicant and MD-LOT agreed that due to the delay to the draft National Marine Plan 2 (NMP2) consultation, the Applicant would not submit a Biodiversity Enhancement Plan or Nature Positive Impact Plan as part of the Morven North and Morven South consent applications.	As agreed, the Applicant has not submitted a Biodiversity Enhancement Plan or Nature Positive Impact Plan as part of the application.
Offshore Ornithology - razorbill conversion factor	02.10.2025	NatureScot	Email received	The Applicant sought NatureScot's advice on 26 September 2025 on the appropriate correction factor for converting razorbill counts from individuals to breeding pairs for the offshore ornithology assessment. The Applicant referenced the updated research by Burnell *et al.* (2023), which recommends applying the reciprocal of 1.34 (≈0.75) instead of the previously used factor of 0.67, and requested confirmation whether	Population counts of razorbill have been calculated applying the correction factor from Burnell *et al.* (2023) within Section 5.3 of Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments of the HRA.

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				NatureScot agreed with adopting this updated approach. NatureScot responded on the 02 October 2025: • NatureScot confirmed agreement with using 0.75 as the updated correction factor for converting razorbill individual counts into breeding pairs, as supported by Burnell *et al.* (2023). • NatureScot stated that these updated established correction factors are appropriate for use in seabird population assessments and should be applied consistently.	
HRA Consultation - CEA and compensation	14.10.2025	Natural England	Virtual meeting	The meeting aimed to discuss the approach to cumulative and in-combination effects assessment for Morven North and Morven South, clarify methodologies for ornithology assessments, review compensation strategies. • Natural England confirmed that while assessments should follow NatureScot guidance for Scottish SPAs, Natural England requires calculations using its own methodology for English SPAs to ensure comparability with other English projects. They agreed that presenting these calculations in an appendix would be acceptable. • Natural England advised that in-combination assessments should present two scenarios: one including compensated projects and one excluding them, with both totals shown in a single table. This approach ensures transparency	Calculation of impacts following Natural England's advice is provided in Volume 3, Annex 5.2: Offshore Ornithology Impact Estimates using Natural England Approaches and includes consideration of the Farne Islands SPA and Flamborough and Filey Coast SPA. In Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments of the HRA the population modelling has followed NatureScot guidance (NatureScot, 2023h) and uses the Natural England PVA tool (Searle *et al.*, 2019) with the methodology and results for all applicable SPAs and associated qualifying features presented in Volume 2, Annex 3.2: Population Viability Analysis, of the HRA.

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				and consistency in cumulative impact evaluations.	Consideration is given to those projects for which compensation measures have been applied throughout Section 5.5 of Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments, of the HRA.
Offshore Ornithology - HRA re-screening	23.10.2025	NatureScot	Virtual meeting	On 23 October 2025, the Applicant presented information which has been issued to NatureScot on 19 October 2025 to inform a discussion on the approach to apportioning for common guillemot in all seasons. The Applicant agreed to present both the Applicant and NatureScot approaches to apportioning to provide apportioning values for all specific SPAs for which LSE[2] were identified in the screening exercise. For Morven North this was relevant to herring gull at the Buchan Ness to Collieston Coast SPA only. For Morven South this was relevant to guillemot at Fowlsheugh SPA. Further, it was agreed that changes to the approach to distance measurement would not be presented for any other species if suitable justification could be provided within the assessment documentation that this would not make a material difference to the outcomes of assessments. In addition, it was agreed to use common guillemot tracking data from Buckingham *et al*. (2023) to identify those SPAs with connectivity with Morven North and Morven South in the post- and non-breeding seasons, on the understanding that the Applicant would review whether the use of the Buckingham *et al.* (2023) data would result in the same SPAs being included as would be the case if the Fair Isle foraging range was applied. The	The Applicant has presented apportioning values for common guillemot at Morven South and herring gull at Morven North based on NatureScot approach as well as the Applicant Approach in Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments of the HRA. For other species, where the different distance measurement approaches for establishing connectivity and apportioning would not result in a material difference to the outcomes of assessment, this has been acknowledged and discussed within Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments of the HRA. The post-breeding and non-breeding regional populations for common guillemot have been defined to incorporate all colonies that fall within a BDMPS region defined based on tracking data from Buckingham *et al*. (2023) in Volume 2, Chapter 3: RIAA Part 3:

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				Applicant confirmed that this was the case through follow up correspondence within the minutes for this meeting.	SPA and Ramsar Site Assessments of the HRA.
Marine mammal and Underwater Sound (UWS) consultation	23.10.2025	NatureScot, MD-LOT	Virtual meeting	The Applicant engaged NatureScot to provide detailed advice on the marine mammal assessment, specifically to confirm appropriate methodologies, data sources, modelling approaches and assumptions across underwater sound modelling (piling, UXO, vessels), species density estimation, population modelling (iPCoD), CEA, and HRA in-combination considerations. The workshop presented the Applicant's full approach and sought NatureScot's scientific and methodological feedback.	Results were presented to NatureScot together with a detailed note on the CEA. NatureScot have provided specific feedback on the CEA and the approach is provided in Section 10.12 of Volume 2, Chapter 10: Marine Mammals. In line with the Morven North and Morven South EIA CEA, the number of impacts assessed in the in-combination assessment has been reduced as discussed in the overview of Section 6.4 of Volume 2, Chapter 2: RIAA Part 2: SAC Assessments of the HRA.
ScotWind East Region CFWG meeting	05.11.2025	SFF SWFPA East region ScotWind developers.	Face to Face meeting	The CFWG held their third meeting to maintain open communication about offshore wind development and its potential effects on commercial fisheries. During the discussion, the Applicant reiterated that changes to grid-connection arrangements had led to the division of the Morven Site into Morven North and Morven South, with implications for planning and consenting. • The SWFPA and SFF advised that SFF members had withdrawn from the Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) and that	The Applicant remains committed to continued participation in the East Region CFWG and with the fishing industry as a whole as confirmed in Section 12.10 of Volume 2, Chapter 12: Commercial Fisheries. The Applicant notes the SFF's withdrawal from FLOWW; however, no replacement Scottish-specific fisheries liaison guidance has been published at the time of writing. As detailed in Volume 2, Chapter 12: Commercial Fisheries and Volume 4, Annex 3: Fisheries Mitigation

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				projects would not be able to utilise FLOWW guidance.).	Monitoring Communication Plan (FMMCP) (Version 1), the Applicant has had regard to established fisheries liaison and mitigation good practice as reflected within the current Scottish Government and Marine Directorate guidance. Should new or replacement Scottish-specific guidance be issued, this will be taken into account in future iterations of the FMMCP.
Commercial Fisheries Consultation - SFF plotter data	11.12.2025	SFF	Virtual meeting	The Applicant met with the SFF to review and discuss confidential fishing vessel plotter data shared for Morven North, Morven South, and the MHPGC export corridor. The plotter data was shared on screen during the meeting and discussed. The Applicant's Commercial Fisheries Lead noted the following key observations relevant to the commercial fisheries baseline characterisation: • The plotter data indicates low levels of SFF member vessel activity across both Morven North and Morven South. • Fishing activity captured includes demersal pair and single trawlers targeting haddock, along with demersal seine-net vessels also targeting haddock. • Although the shared dataset is not time-stamped, SFF are able to interrogate the data and verbally confirmed that most demersal trawl and seine vessel activity has taken place between the months of September to December.	The plotter data was provided in confidence to the Applicant by SFF. SFF instructed that the data was not for sharing or publication. The data has been used by the Applicant's EIA Commercial Fisheries Lead to inform the baseline characterisation presented in Section 12.7 of Volume 2, Chapter 12: Commercial Fisheries.

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				• A notable share of vessel tracks relates to Shetland-based vessels, which operate further south during the winter months to avoid more challenging weather conditions off Shetland. • Within the Morven Site, the south-east corner of Morven South was highlighted as the most important area for SFF member activity.	
Consent Implementation Period Consultation	19.12.2025	MD-LOT	Email issued (Letter)	The Applicant consulted MD-LOT to seek guidance on the standard five-year Section 36 implementation period from consent award to commencement of development attached to the commencement of development condition, which may be challenging for Morven North and Morven South due to factors not entirely within the control of the Applicant, such as: • Grid-connection uncertainty; • long lead times for procurement of High Voltage Direct Current (HVDC) equipment; • the risk that the validity of baseline environmental surveys may expire before construction can begin. The Applicant requested assurance that a longer implementation period (up to 10 years) could be applied and asked what supporting information would be required to justify this within their applications. MD-LOT responded and flagged that the need and justification for a longer validity period (up to 10 years) should be set out in the application and flagged that the Applicant should seek the view of NatureScot on this point.	The Applicant has provided further details on this matter in Chapter 6: Planning Statement and Needs Case of the Additional Application Information.

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				The Applicant subsequently shared the information with NatureScot (01 February 2026), who noted the request on 05 February 2026 but advised that the matter should continue to be handled through MD-LOT.	
Commercial Fisheries Consultation - draft FMMCP	15.01.2026	N&EC RIFG; SFF; SPFA; SWFPA	Email issued	The Applicant consulted commercial fisheries stakeholders by sharing a draft FMMCP for Morven North and Morven South and requested feedback ahead of the consent application. Stakeholders were invited to review the document until 30 January 2026, after which an in-person meeting on 12 February 2026 was held to discuss comments and outline the underpinning impact assessment. The consultation reflected a collaborative approach, aiming to refine the FMMCP based on stakeholder input before final submission. Written feedback was received from SFF on 30 January 2026 and discussed in the meeting of the 12 February 2026.	A detailed summary of issues raised, and Applicant responses is provided in Volume 4, Annex 3: FMMCP (Version 1); information is not duplicated here.
Cumulative Effects Screening Consultation	29.01.2026	MD-LOT, NatureScot	Email received	On 26 November 2025, the Applicant shared the draft Morven North and Morven South Cumulative Screening Annex with NatureScot for information, in line with actions agreed at previous quarterly MD-LOT meeting. The Annex set out the long list of projects and topic-specific screening outcomes for the cumulative and in-combination assessments as of September 2025. NatureScot reviewed Section 1 (Introduction) and Section 2 (Methodology) only, and confirmed agreement with the approach outlined, including the Cumulative Study Areas and tiers. It was noted that where study areas were indicated as 'up to' a certain distance (for example, up to 28km for the Morven North Physical Processes Cumulative Study Area), a lesser distance than indicated would	The cumulative effects screening and tiers have followed the approach which has been agreed by NatureScot. Section 1.5.6 of Volume 1, Chapter 6: EIA Methodology presents the approach to cumulative effects screening and Section 1.5.7 presents the tiers, with further details presented within Volume 3, Annex 6.1: Cumulative Effects Screening. The Cumulative Study Areas for each topic have been defined within topic chapters (Volume 2, Chapters 7 to 20). Where a

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				not be supported unless further justification was provided. NatureScot did not review the specific list of projects considered within cumulative assessments.	Cumulative Study Area extent has been considered within the range defined "up to" a specific distance, this has been justified within Table 2.1 of Volume 4, Annex 6.1: Cumulative Effects Screening, with further explanation provided within the relevant topic chapters (Volume 2, Chapters 7 to 20).
Marine Mammal and CEA Consultation	04.02.2026	NatureScot, MD-LOT	Email received	The Applicant sought NatureScot's advice (Letter on 14 October 2025, with a follow up UWS workshop held on 22 October 2025, NatureScot responded on 17 October 2025, the Applicant responded on 15 December 2025, NatureScot responded on 4 February 2026, and the Applicant responded on 16 March 2026). The Applicant was looking to: • Confirm agreement on the marine mammal CEA approach; • agree parameters for iPCoD population modelling; • verify screening of other projects; • agree density datasets; • agree deterrence ranges; • ensure alignment on methodology before finalising the EIA and consent applications. The rows below present the key points of consultation and how these have been addressed within Volume 2, Chapter 10: Marine Mammals. The Applicant welcomes further advice from NatureScot during consultation on the Morven North and Morven South EIA Report.	See rows below for the Applicant's response to specific points in this consultation.

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				NatureScot noted that screening of projects should reflect the MU overlap and impact-pathway extent rather than relying solely on distance criteria. The Applicant confirmed that both the Greater North Sea and Coastal East Scotland MUs would be considered where relevant, with this clarification to be reflected in the assessment Volume 2, Chapter 10: Marine Mammals.	The relevant Marine Mammal MUs have been selected based on where receptor–impact pathways overlap with Morven North and Morven South's predicted zones of influence (Section 10.4 of Volume 2, Chapter 10, Marine Mammals).
				NatureScot did not advise that all impacts that are non-significant for project alone should be scoped out of CEA; example is disturbance from piling. In response to guidance on impact-specific screening, the Applicant stated that several impacts, such as disturbance from piling and vessel use, had already been carried forward into the cumulative assessment despite being non-significant for project-alone, and that full justification for all other impact decisions would be provided in the Volume 2, Chapter 10: Marine Mammals.	Projects were screened into the CEA where construction or operation could occur within one year either side of the combined Morven North and Morven South programme (Section 10.9.1 of Volume 2, Chapter 10, Marine Mammals). Although project alone effects were not significant, piling disturbance and vessel noise disturbance were carried forward into the CEA, while all other impacts were screened out with detailed justification (Table 10.75 in Volume 2, Chapter 10: Marine Mammals).
				NatureScot advised that the assessment considers the UK portion of the relevant Inter-Agency Marine Mammal Working Group (IAMMWG) MU for inferring the percentage of the population with the potential to be impacted as well as the input reference population used in iPCoD modelling, both for project alone and cumulative assessments. NatureScot noted they would apply a precautionary stance if the full MU	NatureScot's 2023 response within the Scoping Opinion did not advise use of the UK portion of the MU, but the Applicant note that more recent project guidance has shifted. Accordingly, the assessment presents both the UK-portion MU percentages and uses the full MU

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				continued to be used. Since the Morven Site Scoping Opinion was published in 2023, NatureScot have now consistently recommended using the UK portion of the MU.	population in iPCoD, which remains the ecologically valid reference (Volume 3, Annex 10.5: Marine Mammals Interim Population Consequences of Disturbance (iPCoD) Modelling Report). The Applicant acknowledges that this approach remains an area of disagreement. However, given the very small proportions of the UK-portion MUs affected across all species (up to 0.58 % for the temporal MDS and up to 1.16 % for the spatial MDS), the Applicant considers that the undertaking of additional population modelling would be unlikely to alter the conclusions of the impact assessment in relation to behavioural disturbance effects on marine mammals during piling.
				NatureScot deferred to MD-LOT to comment further on projects screened into the Marine Mammals cumulative and in-combination assessments, noting from NatureScot's own understanding of build schedules that there is likely to be overlap with Buchan (if consented) as well as Seagreen 1A (for the Offshore Substation Platforms (OSPs)).	Volume 3, Annex 6.1: Cumulative Effects Screening reflects the latest published programme information available at the time of writing. Based on those schedules, Buchan and Seagreen 1A were screened out for construction related effects as their timelines fell outside the one year buffer. For vessel noise disturbance, Buchan was beyond the screening distance, and Seagreen 1A vessel

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					activity was already included within the existing baseline.
				NatureScot noted that a 50km screening buffer may not be the most appropriate method of screening in projects for vessel noise, both during construction and operation. They also advised that the most likely transit routes to and from port should be included within the assessment.	Following NatureScot's advice, the vessel noise screening distance was increased to 86km, capturing all realistic port transit routes (with Aberdeen Port ~63km from both Morven North and Morven South).
				NatureScot flagged that during the UWS workshop (22nd October 2025), the Applicant stated that they would be applying a 140 dB SELss cap to the harbour porpoise dose-response curve for disturbance predictions. NatureScot consider a plateau or truncation at 140 dB SELs as an intermediate step between the original Graham *et al.* (2017) dose-response curve and the deterrence (distance based) approach. After recent discussion with MD-SEDD, NatureScot advised that the Applicant presented both the full dose-response predictions and the deterrence function, as well as the capped 140dB dose-response for comparison. NatureScot further advised that the 140dB SELss cap could be used for all species except low-frequency cetaceans, for which the full dose-response curve remained necessary due to their sensitivity to low-frequency noise.	Paragraph 10.8.3.18 in Volume 2, Chapter 10: Marine Mammals provides a clear justification for not applying the full harbour porpoise dose response curve, and consistent with NatureScot's request, the assessment presents all three approaches: full dose response, 140dB SELs capped, and the deterrence based method.
CEA Consultation - Offshore Ornithology	05.02.2026	NatureScot, MD-LOT	Email issued (Letter)	On 01 October 2025, the Applicant issued a letter to NatureScot and MD-LOT outlining significant discrepancies identified within the NEEOG cumulative ornithology database. This database, developed to provide a consistent set of cumulative collision and displacement totals for offshore wind assessments, was found to contain	The Applicant has proceeded as proposed in the letter from 01 October 2025 to use updated, project-specific assessment data rather than the NEEOG database values for the cumulative and in-combination offshore ornithology

Consultation title	Consultation date	Consultee	Consultation type	Issue(s) raised	Response to issue
				outdated, incorrect, or inconsistent population and impact values for several offshore wind projects. The Applicant requested NatureScot's advice on the implications of these issues and sought confirmation that their proposed approach, to use updated, project-specific assessment data rather than the uncorrected NEEOG database values, was acceptable for the cumulative and in-combination offshore ornithology assessments for Morven North and Morven South. NatureScot responded on 05 February 2026, confirming that NatureScot is content for the Applicant to proceed as proposed in the letter from 01 October 2025. NatureScot offered to review the new numbers proposed to be used by the Applicant if needed.	assessments. This is discussed in Section 11.12 of Volume 2, Chapter 11: Offshore Ornithology and in Section 5.5 of Volume 2, Chapter 3: RIAA Part 3: SPA and Ramsar Site Assessments of the HRA.
FMMCP stakeholder consultation	12.02.2026	SFF; SPFA; SWFPA	In-person and virtual meeting	Following circulation of the draft FMMCP to stakeholders for comment on 15 January 2026, and receipt of written feedback on 30 January 2026, the Applicant held an in-person meeting with commercial fisheries stakeholders to discuss stakeholder feedback on the scope and assumptions of the draft FMMCP, including discussion of potential amendments to the FMMCP. A detailed summary of issues raised is provided in Volume 4, Annex 3: FMMCP (Version 1); information is not duplicated here. As a follow-up action from the meeting, on 04 March 2026 SFF provided an example of timestamped fishing track data from 28 November 2022, confirming that the track shown lay within the Morven Site footprint.	A detailed summary of the Applicant's response is provided in Volume 4, Annex 3: FMMCP (Version 1); information is not duplicated here. The Applicant acknowledged receipt of the data and confirmed that it offered helpful context.

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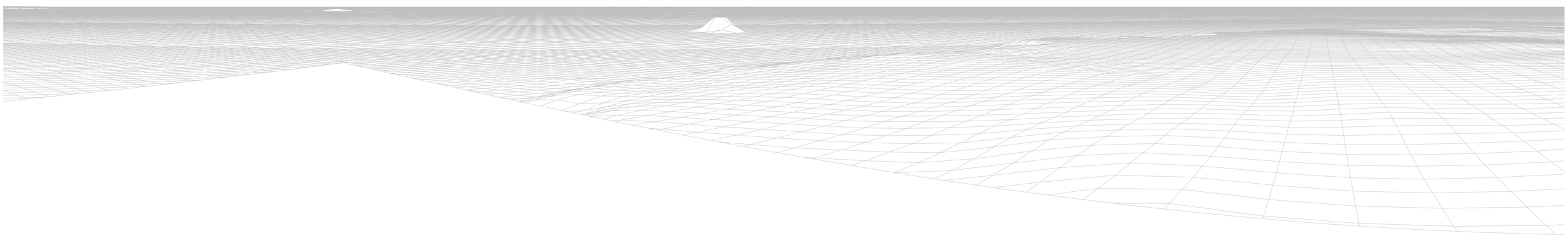
Appendix A Post-scoping viewpoints

2.1.1.1 The following viewpoints shared with stakeholders after the publication of the Morven Site Scoping Report have been provided in this appendix for completeness:

- North Berwick Law;
- Ethie Haven;
- Dunninald Castle.

Morven Scoping Boundary



North Berwick Law
Morven Scoping Boundary

Morven Scoping Boundary

Ethie Haven
Morven Scoping Boundary

Morven Scoping Boundary

Dunninald Castle
Morven Scoping Boundary