



Eastern Green Link 3

Appendix 5B: Habitats Regulations Appraisal Stage 2 Report to Inform Appropriate Assessment

Prepared for: Scottish Hydro Electric Transmission plc (SHE-T)



collaborative
environmental
advisers

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Abbreviations/Glossary

Abbreviation	Description
AA	Appropriate Assessment
AEoI	Adverse Effects on Integrity
CEA	Collaborative Environmental Advisers
CEMP	Construction Environmental Management Plan
CSV	Construction Support Vessel
EC	European Commission
EGL	Eastern Green Link
EU	European Union
GW	Gigawatt
HDD	Horizontal Directional Drilling
HRA	Habitats Regulations Appraisal
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IROPI	Imperative Reasons of Overriding public Interest
km	Kilometre
kV	Kilovolt
LSE	Likely Significant Effect
m	Metres
MCAA	Marine and Coastal Access Act 2009
MD-LOT	Marine Directorate – Licensing Operations Team
MHWS	Mean High Water Springs
MLA	Marine Licence application
mm	Millimetre
MMO	Marine Management Organisation
NGET	National Grid Electricity Transmission
NM	Nautical Mile
RIAA	Report to Inform Appropriate Assessment
RLB	Red Line Boundary
SAC	Special Area of Conservation
SMWWC	Scottish Marine Wildlife Watching Code
SNCB	Statutory Nature Conservation Bodies
SNH	Scottish Natural Heritage
SPA	Special Protection Area
SSEN	Scottish and Southern Electricity Networks
UK	United Kingdom
UNCLOS	United Nations Convention on the Law of the Sea



1. Introduction

1.1. Background to the Project

The Eastern Green Link 3 (EGL 3) (hereinafter referred to as the 'Project') is being developed by Scottish Hydro Electric Transmission plc operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission) (the 'Applicant'). For the purposes of seeking the necessary consents, the Project has been split into different 'Schemes' i.e. English Onshore Scheme, English Offshore Scheme, Scottish Onshore Scheme and the Scottish Offshore Scheme (herein referred to as 'the Proposed Development'). The Applicant is applying for a Marine Licence from MD-LOT, for the construction, operation and maintenance of the Proposed Development.

This shadow Habitats Regulations Appraisal (HRA) has been prepared on behalf of the Applicant to present the findings of the Stage 2 Report to Inform Appropriate Assessment (RIAA). It forms part of the Marine Licence Application (MLA) to the Marine Directorate – Licensing Operations Team (MD-LOT) for the construction and operation of the Proposed Development. It should be read in conjunction with **Appendix 5A: Habitats Regulations Appraisal Stage 1 Screening**.

This HRA Stage 2 RIAA is written with specific regard to the Proposed Development which comprises:

- Approximately 145 km of subsea HVDC cable from the proposed landfall at Sandford Bay to the boundary with adjacent English waters. The subsea cable system would consist of two bundled HVDC cables and a fibre optic cable (up to the first offshore joint) for control and monitoring purposes, as described further in **Chapter 3: Project Description**.

The location of the Proposed Development is illustrated by the Red Line Boundary (RLB) in **Chapter 3: Project Description, Figure 3-1 (Drawing reference C01494-EGL3-MEA-LOC-001)**. The RLB covers the entire area within which development could take place comprised of both temporary and permanent components of the Proposed Development. These include the proposed seabed preparation and maintenance works which would take place.

1.2. Aim of this Report

Under the Habitats Regulations (see **Section Error! Reference source not found.**) and as part of the MLA process, the competent authority (being MD-LOT) is required to undertake a Habitats Regulations Appraisal (HRA). The Applicant has undertaken a Stage 1 Screening, which is presented in **Appendix 5A: Habitats Regulations Appraisal Stage 1 Screening**. The screening process identified one European site which had the potential to experience a likely significant effect (LSE) as a result of the Proposed Development: the Buchan Ness to Collieston Coast Special Protection Area (SPA). Therefore, this site was 'screened in' and progressed onto a Stage 2 Appropriate Assessment (AA).

This RIAA has been prepared by the Applicant to provide further information to enable the competent authority to carry out an AA to determine whether the Proposed Development could have an Adverse Effect on the Integrity (AEoI) of the Buchan Ness to Collieston Coast SPA, either alone or in-combination with other plans and projects, in view of the site's conservation objectives.

The aim of the report is to provide information to MD-LOT and the relevant Statutory Nature Conservation Bodies (SNCBs) to assist them in making an informed decision on whether the Proposed Development could result in an AEoI for the Buchan Ness to Collieston Coast SPA. Where it is not possible to rule out an AEoI, alone or in-combination with other plans or projects, the HRA process must progress onto the next stage 'Derogations' whereby three legal tests must be passed for a derogation to be granted. However, it has been concluded in this RIAA that further stages in the HRA process will not be required.

1.3. Structure of this Report

This report is structured as outlined below:

- Section 1 (this Section): **Introduction** to the report and the Project
- Section 2: **Project Description**, outlining the key aspects of the Project relevant to the HRA process
- Section 3: **Summary of Stage 1 Screening**
- Section 4: **Stage 2 Report to Inform Appropriate Assessment**
- Section 5: **Conclusion**

1.4. Competent Experts

This report was prepared by the team at Collaborative Environmental Advisers (CEA) and quality checked and approved by a marine specialist who has a career spanning 20 years+ in development of marine infrastructure. This marine specialist also holds a BSc in Marine Biology and an MRes in Marine Technology.



2. Project Description

2.1. The Proposed Development

A full description of the Proposed Development is provided in **Chapter 3: Project Description**. This section provides a short summary of the Proposed Development and should be read in conjunction with Chapter 3 for further detail and understanding. The Proposed Development comprises a 2 GW HVDC submarine cable that extends from the mean high water springs (MHWS) mark at Sandford Bay, Peterhead, Aberdeenshire, through Scottish inshore and offshore waters to the border with English adjacent waters.

The construction programme for the Proposed Development is expected to take approximately 55 months in total, commencing at the earliest in 2028 and ending in 2033. Works at the proposed landfall may commence in 2028/2029 with installation of the horizontal directional drilling (HDD) and ducts ahead of the main works. A summary of key maximum design parameters and indicative vessel requirements for the Proposed Development are provided in Section 2.1 of **Appendix 5A: Habitats Regulations Appraisal Stage 1 Screening**.

3. Summary of Stage 1 Screening

The Applicant's Stage 1 HRA Screening (**Appendix 5A: Habitats Regulations Appraisal Stage 1 Screening**) identified one offshore European site to be screened into the RIAA: the Buchan Ness to Collieston Coast SPA. A summary of the relevant qualifying features and the potential impacts screened in the RIAA is provided in **Table 3-1**.

Table 3-1: Summary of the relevant sites and potential impacts screened into the RIAA

Site name and code	Relevant qualifying feature	Potential impact
Buchan Ness to Collieston Coast SPA [UK9002491]	<ul style="list-style-type: none"> Common Guillemot (<i>Uria aalge</i>); and European shag (<i>Phalacrocorax aristotelis</i>). 	Visual / physical disturbance or displacement
		In-combination effects

4. Stage 2 Report to Inform Appropriate Assessment

4.1. Assessment Methodology

4.1.1. Overview

This RIAA considers whether the Proposed Development could have an AEoI on the Buchan Ness to Collieston Coast SPA. If it is not possible to rule out an AEoI alone or in-combination with other plans/projects before or after mitigation is applied, the HRA must progress to the next stage in the process.

4.1.2. Standards and guidance

The RIAA has been carried out in accordance with the principles set out in guidance relevant to the Proposed Development, which is as follows:

- Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EC, 2002)
- Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (EC, 2018);
- The European Commission Guidance - Article 6 of the Habitats Directive - "Rulings of the European Court of Justice. Final Draft", September 2014 (EC, 2014);
- EU Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC (EC, 2007);
- UK Government guidance on HRA (UK GOV, 2023);
- UK Government guidance for Nationally Significant Infrastructure Projects (UK GOV, 2025);
- The Habitats Regulations Handbook (Tyldesley and Chapman, 2013); and
- National Planning Framework 4: Part 2 –National Planning Policy (Scottish Government, 2024)

In relation to guidance issued by the SNCBs, this includes:



- Joint SNCB Interim Displacement Advice Note 2022 (MIG-Birds, 2022).
- Habitats Regulations Appraisal (HRA) (NatureScot, 2025)
- NatureScot Guidance Note - The handling of mitigation in Habitats Regulations Appraisal – the People Over Wind CJEU judgement (NatureScot, 2025a)
- European Site Casework Guidance: How to consider plans and projects affecting Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (NatureScot, 2022).

4.2. Buchan Ness to Collieston Coast SPA

The Applicant's HRA Screening (**Appendix 5A: Habitats Regulations Appraisal Stage 1 Screening**) identified that there was a potential for LSE on the designated features of breeding common guillemot and breeding European shag from the following potential impacts:

- Visual/physical disturbance or displacement during construction, operation and maintenance and decommissioning; and
- In-combination effect for visual/physical disturbance or displacement during construction, operation and maintenance and decommissioning.

4.2.1. Site description

The Buchan Ness to Collieston Coast SPA is a stretch of south-east facing cliff in Aberdeenshire, Scotland. The 15 km stretch of cliffs, formed of granite, quartzite and other rocks, runs south of Peterhead, broken only by the sandy beach of Cruden Bay. The varied coastal vegetation on the ledges and the cliff tops includes maritime heath, grassland and brackish flushes ((Scottish Natural Heritage (SNH), 2009). The boundary of the SPA follows the boundaries of Bullers of Buchan Coast SSSI and Collieston to Whinnyfold Coast SSSI, and the seaward extension extends approximately 2 km into the marine environment to include the seabed, water column and surface. The total area of the SPA is 54.01 km².

Buchan Ness to Collieston Coast SPA qualifies under Article 4.2 of the Birds Directive by regularly supporting an internationally important assemblage of birds. It regularly supports 95,000 seabirds including nationally important populations of marine birds during the breeding season. These species include common guillemot, northern fulmar (*Fulmarus glacialis*), European shag, European herring gull (*Larus argentatus*) and black-legged kittiwake (*Rissa tridactyla*) (JNCC, 2015).

The RLB overlaps with the SPA for an area of approximately 0.16 km², which is equivalent to 0.30% of the entire SPA.

4.2.2. Conservation objectives

Conservation and Management Advice from NatureScot, (2024) sets the following conservation objectives for the Buchan Ness to Collieston Coast SPA:

1. To ensure that the qualifying features of the Buchan Ness to Collieston Coast SPA are in favourable condition and make an appropriate contribution to achieving Favourable Conservation Status.
2. To ensure that the integrity of the Buchan Ness to Collieston Coast SPA is restored in the context of environmental changes by meeting objectives 2a, 2b and 2c for each qualifying feature:
 - a) The populations of the qualifying features are viable components of the Buchan Ness to Collieston Coast SPA.
 - b) The distribution of the qualifying features is maintained throughout the site by avoiding significant disturbance of the species.
 - c) The supporting habitats and processes relevant to qualifying features and their prey resources are maintained, or where appropriate restored, at Buchan Ness to Collieston Coast SPA.

At the time of writing this report, the feature condition of common guillemot is 'favourable maintained' and the feature condition of European shag is 'unfavourable declining' (NatureScot, 2024).

4.2.3. Relevant Proposed Development activities

The relevant activities which could cause or contribute to the impact of 'visual/physical disturbance or displacement' are the presence of the Proposed Development vessels during geophysical surveys, pre-construction, construction, operation (if remedial repairs are required) and decommissioning.

4.2.4. Assessment alone prior to mitigation

The conservation and management advice for the Buchan Ness to Collieston Coast SPA notes that both common guillemot and European shag show sensitivity to visual disturbance associated with vessels and noise disturbance (NatureScot, 2024). Common



guillemot and European shag have a moderate disturbance sensitivity score (where 1 is the lowest and 5 is the highest) of 3 (MIG-Birds, 2022). The distance at which a bird permits a potential disturbance to approach before taking flight or engaging in other evasive behaviour is known as an escape distance and can be used to assess the impact of visual/physical disturbance or displacement. Fliessbach *et al.*, (2019) calculated the mean escape distance of various bird species from vessels and calculated that the mean escape distance for common guillemot is 127 m. There is no mean escape distance provided for European shag however, it is reasonable to assume that their escape distances would fall within the range of other species in the same functional group (divers, grebes and mergansers, as assigned in **Appendix 5A: Habitats Regulations Appraisal Stage 1 Screening**). Red-necked grebe (*Podiceps grisegena*) exhibits the shortest mean escape distance \pm standard deviation at 221 ± 171 m, while the common scoter (*Melanitta nigra*) has the largest escape distance at $1,600 \pm 777$ m, suggesting that European shag would likely fall within this range.

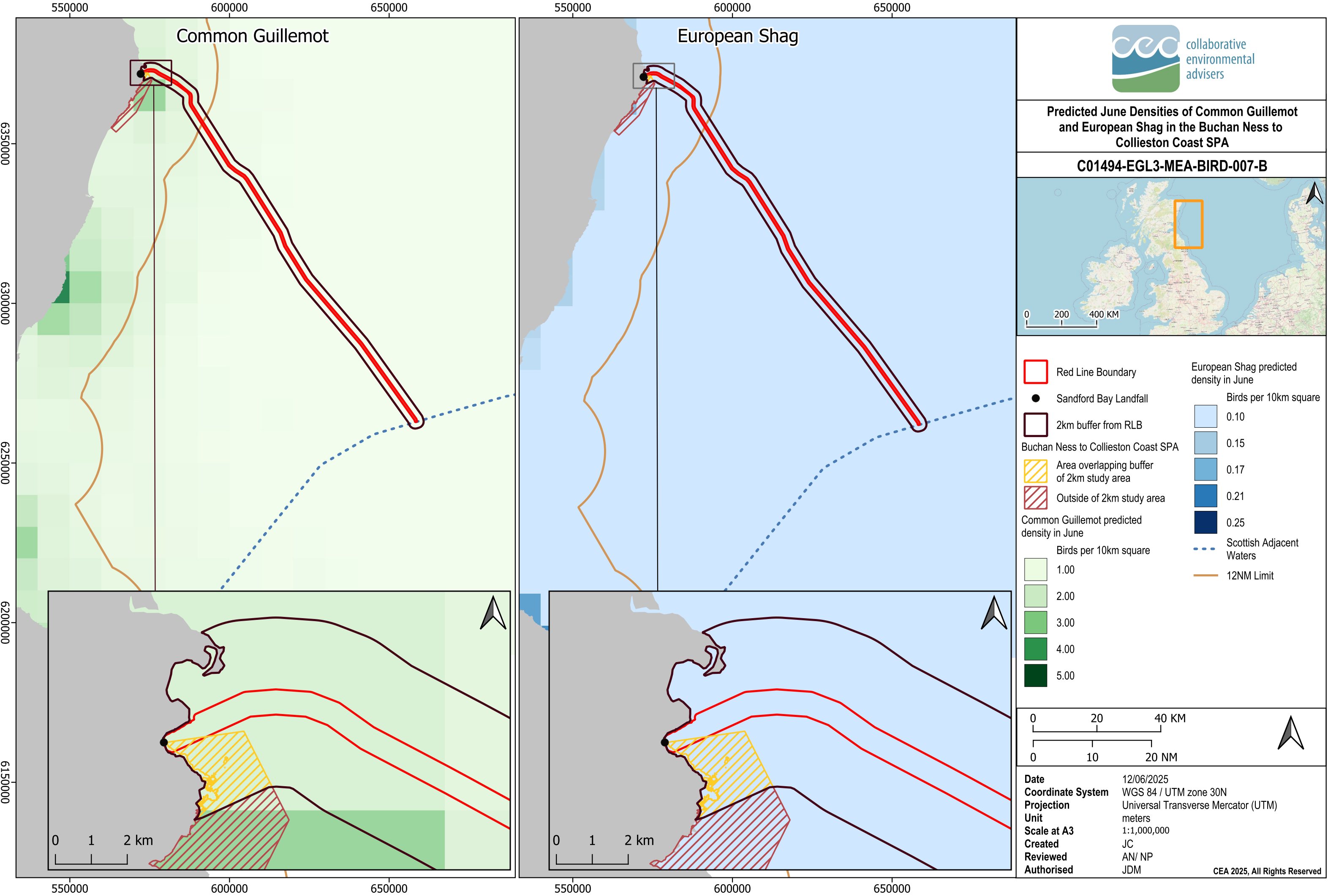
Bird species which are sensitive to visual/physical disturbance such as common guillemot and European shag, may take evasive action to avoid vessels and may not rapidly resetttle following disturbance. Visual/physical disturbance or displacement may affect bird species by altering energy intake/expenditure, breeding success and overall survival (Goodship and Furness, 2022). Common guillemot and European shag are present all year round in the SPA (NatureScot, 2024) and are most vulnerable to disturbance during the breeding season where they will be present in larger numbers for nesting and chick-rearing. Breeding for common guillemot typically starts in April and ends in August. Breeding for European shag typically starts in March however, it can start earlier from February onwards and ends mid-September (SNH, 2014). At the time of writing this RIAA, the timing of activities for the Proposed Development is unknown and therefore it must be assumed that activities could take place during the breeding period for common guillemot and European shag.

To assess potential visual disturbance or displacement effects, a 2 km buffer is recommended by SNCBs (MIG-Birds, 2022). For this assessment, a 2 km buffer was applied to the RLB using GIS and was then clipped to the boundary of the Buchan Ness to Collieston Coast SPA. The buffer zone overlaps with approximately 3.47 km² of the SPA, which is equivalent to 6.42% of the total SPA area, which measures 54.01 km² (JNCC, 2015). According to the Seabird Monitoring Handbook (Walsh *et al.*, 1995), peak breeding season counts for common guillemot and European shag typically occur in early June. Whilst it is acknowledged that peak counts may be considerably later or earlier than normal in some years, June has been used as a representative month for estimating species density within the buffer zone for the purposes of this assessment.

Waggit *et al.*, (2019) collated aerial and vessel survey data from the North-East Atlantic between 1980 and 2018 to model monthly spatial variation in predicted seabird densities. This dataset has been used to estimate the predicted June densities of common guillemot and European shag within the 2 km buffer zone, as shown in **Figure 4-1 (Drawing reference C01494-EGL3-MEA-BIRD-007-B)**. The average density of common guillemot was estimated at 2.58 individuals per 10 km², and for European shag, 0.07 individuals per 10 km². Based on these estimates, a predicted maximum of 0.89 guillemot and 0.02 European shag could be present within the buffer zone at any one time and therefore, could potentially be displaced by the Proposed Development. However, these calculations assume that vessel activity occurs simultaneously across the entire RLB within the SPA. In reality, the spatial extent of disturbance or displacement would be more limited, as pre-construction, construction and decommissioning activities typically progress in a linear manner and remedial works would only be required at the affected area. As a result, the maximum number of individuals disturbed or displaced by the Proposed Development at any one time are likely to be lower than the calculated maximum.

However, while a single, short-term disturbance event such as cable lay activities is unlikely to result in a measurable effect on an individual bird's fitness or productivity, repeated disturbance, or disturbance over an extended period of time may affect both individual survival and population-level reproductive success. At the proposed landfall at Sandford Bay, a jack-up barge, spud barge or multi-cat vessel would be on site at the HDD exit for a period of 2-4 months to support the installation of the high-density polyethylene ducts. Other vessels used at this time may include a guard vessel, crew transfer vessels, a diver support vessel and tugs. Depending on the construction programme and any seasonal sensitivities at the landfall, there may be a break in works between the HDD finalisation and the cable pull-in. Each cable pull is expected to take up to seven days of 24 hour working, giving a total duration of 14 days. For this activity, up to seven vessels may be present including the larger cable lay vessel. Given that the proposed landfall is adjacent to and overlapping the marine extension of the SPA for an area of approximately 0.16 km², there is the potential for common guillemot and European shag to be present within the vicinity of the construction vessels.

Given that vessels could be on site at the HDD exit for a period of 2-4 months, vessels could be present for the entire breeding season for common guillemot and the majority of the breeding season for European shag. It is acknowledged that for the most part, vessels from the Proposed Development would be stationary and outside of the SPA boundary. Furthermore, EMODnet, (2024) indicates that vessel density in Sandford Bay averaged between 12 and 53 hours per km² for the period 2017 – 2023, which suggests a certain degree of habituation to vessels in Sandford Bay. However, due to the protection afforded to common guillemot and European shag during the breeding season and their sensitivity to disturbance, taking a precautionary approach, **it must be assumed that there is the potential for an AEoI from the Proposed Development alone, should vessels from the Proposed Development enter the Buchan Ness and Collieston Coast SPA during the breeding season.**



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4.2.5. Proposed Mitigation

As set out in **Chapter 4: Marine Environmental Appraisal Scope and Methodology, Chapter 9: Intertidal and Offshore Ornithology and Chapter 15: Schedule of Mitigation**, embedded mitigation measures form part of the design for which consent is sought and can be characterised as 'design measures' or 'control and management measures.' This embedded mitigation would be implemented as part of the Proposed Development and secured in the Marine Licence as relevant.

Several management plans would be provided to discharge Marine Licence conditions prior to the start of construction. These would include a Construction Environmental Management Plan (CEMP), Marine Pollution Contingency Plan, Marine Mammal Mitigation Plan and a Fisheries Management and Mitigation Plan. These documents will outline measures to be implemented to comply with legislation, such as Prevention of Pollution at Sea and Safety of Life at Sea, and the mitigation commitments proposed within the Marine Environmental Appraisal.

Embedded mitigation measures applicable to the effect of visual/physical disturbance or displacement on breeding common guillemot and European shag as secured through the CEMP are listed below:

- OO01 - Existing shipping lanes would be utilised for vessel transiting to and from the Proposed Development to avoid additional disturbance to seabirds, where practicable;
- OO02 - Vessel operators will be made aware of the importance and sensitivity of relevant species to disturbance. Vessels would avoid rafting birds and areas with high densities of birds, where practicable;
- OO03 - Artificial lighting on vessels would be directional and only used when necessary, noting that health and safety requirements will need to be met for safe working practices; and
- OO04 - All vessels used during the course of the licensed activity will adhere to the Scottish Marine Wildlife Watching Code (SMWWC).

In order to further mitigate the effect of visual/physical disturbance or displacement on common guillemot or European shag during the breeding season (March to September), the following project specific mitigation (PSM01) will be implemented:

- All project vessels operating within 12 NM of the coastline will have the boundary of the Buchan Ness to Collieston Coast SPA marked on their navigational systems;
- Vessel transit routes will be planned to avoid entering the Buchan Ness to Collieston Coast SPA; and
- Vessels must avoid entering the Buchan Ness to Collieston Coast SPA (the seaward extension of which extends 2 km from the coastline) during the period 1 March to 15 September inclusive. Where the RLB overlaps with the SPA, vessels should remain within the RLB. If such vessels are required to enter the SPA outside of the RLB this must be for the purposes of safe navigation (or as agreed with NatureScot), they must avoid approaching cliffs where nesting birds are present and adhere to the SMWWC.

4.2.6. Conclusion of assessment alone

The implementation of the mitigation proposed in **Section 4.2.5** will ensure that vessel movements within the Buchan Ness to Collieston SPA are restricted during the breeding season as per the conservation objectives for the site. Any vessels required within the SPA will avoid rafting birds, areas of high bird density, limit the use of directional artificial lighting and adhere to the SMWWC. Therefore, the proposed mitigation measures will significantly reduce the effect of visual/physical disturbance or displacement on common guillemot or European shag from the Proposed Development. **In conclusion, with the implementation of the mitigation proposed in Section 4.2.5, there will be no AEol on breeding common guillemot or European shag within the Buchan Ness to Collieston Coast SPA from the Proposed Development alone.**

4.2.7. Assessment in-combination

If other plans or projects are under construction at the same time as the Proposed Development, there could be an in-combination effect for the impact of visual/physical disturbance or displacement on the breeding features of common guillemot and European shag within the Buchan Ness to Collieston Coast SPA. Joint SNCBs recommend a standard displacement buffer of 2 km for most bird species, however, they recommend a displacement buffer of 4 km for divers and seaducks, which have been assessed as being the most sensitive bird species to vessel disturbance (MIG-Birds, 2022). As European shag falls under the 'diver' functional group, a 4 km displacement buffer has been used as a search area for identifying other plans/projects which could have an in-combination effect on common guillemot and European shag. It is noted that this would be a precautionary search area for common guillemot as this species falls under the 'auk' functional group. **Appendix 5A: Habitats Regulations Appraisal Stage 1 Screening** identified two other subsea cable projects within 4 km of the Buchan Ness to Collieston Coast SPA:

- Eastern Green Link 2 (EGL 2); and
- Cenos Floating Offshore Wind Farm (OWF) – transmission infrastructure.



EGL 2 crosses the RLB of the Proposed Development within the Buchan Ness to Collieston Coast SPA, with landfall also at Sandford Bay. Cenos Floating OWF – transmission infrastructure crosses the RLB of the Proposed Development outside of the SPA and enters the SPA to the south of the Proposed Development, with landfall at Long Haven. However, it is noted that the Buchan Ness to Collieston Coast SPA is already subject to high levels of vessel traffic. Using GIS, a 4 km displacement buffer was added to the Buchan Ness to Collieston Coast SPA and the Vessel Density for 2023 (most recent data) (EMODnet, 2024) was clipped to the buffer. Within the SPA and the 4 km displacement buffer, vessel density ranged from 0 – 12,467 hours per km² in 2023, with an average of 83 hours per km². This suggests that common guillemot and European shag from the Buchan Ness to Collieston Coast SPA would have a certain degree of habituation to vessels. **Figure 4-2 (Drawing reference C01494-EGL3-MEA-BIRD-008)** illustrates the location of EGL 2 and Cenos Floating OWF – transmission infrastructure in relation to the Proposed Development (including a 2 km buffer either side of the RLB), along with the annual average vessel density for 2023 sourced from EMODnet, (2024).

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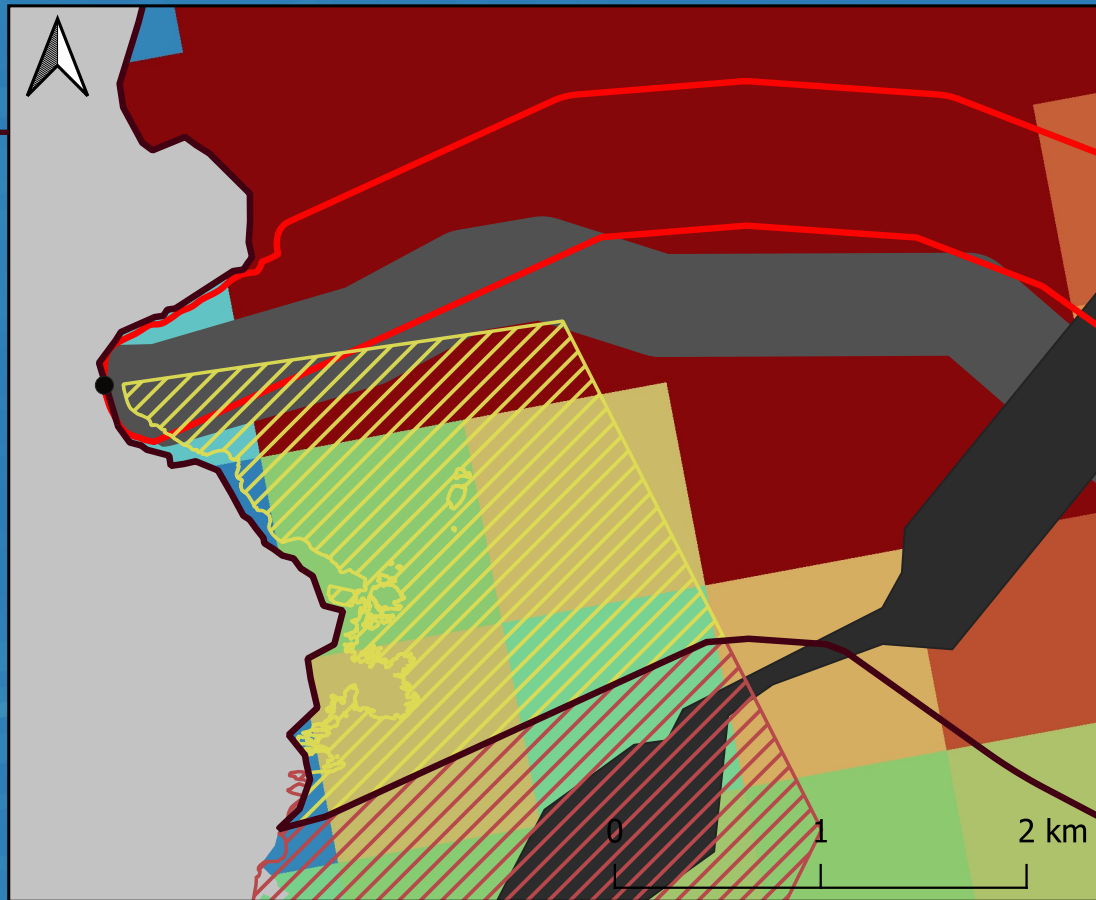
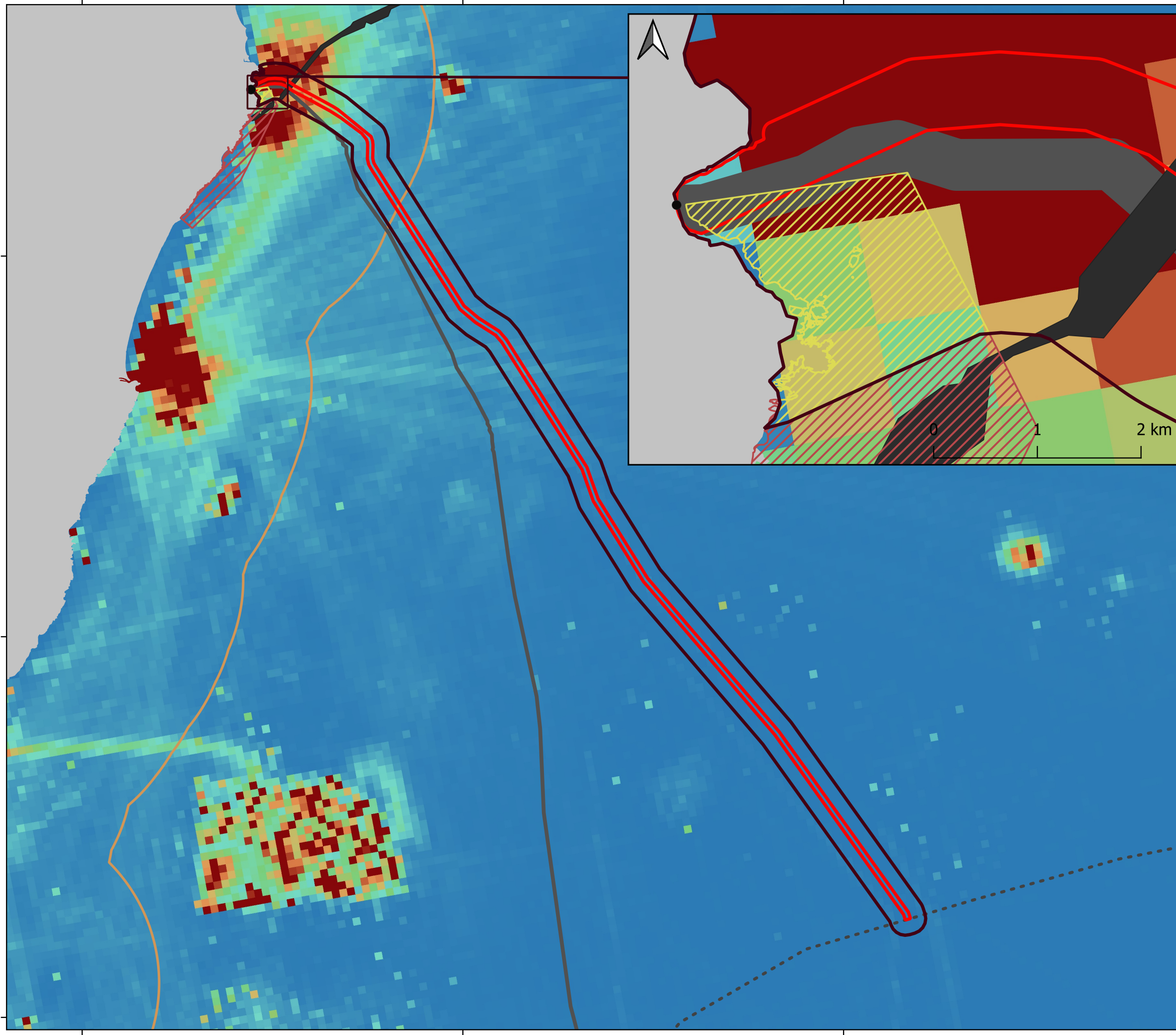
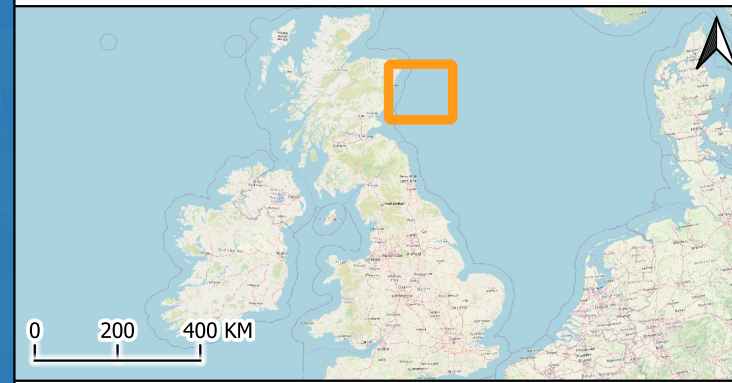
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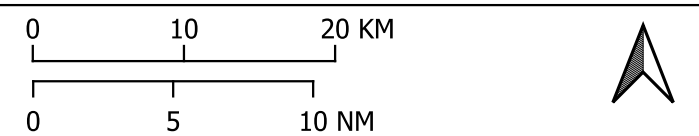


Annual Vessel Density within the Buchan Ness to Collieston Coast SPA and Location of the EGL 2 and Cenosis Cable Routes

C01494-EGL3-MEA-BIRD-008-C



- Red Line Boundary
- Sandford Bay Landfall
- 2km Buffer from RLB
- EGL 2 Cable Route
- Cenosis Cable Route
- Buchan Ness To Collieston Coast SPA**
- Area Overlapping Buffer of 2km Study Area
- Outside of 2km Study Area
- Vessel Density - 2023 (hours per square kilometre per month)**
- 15
- 0
- Scottish Adjacent Waters
- 12NM Limit



Date	29/08/2025
Coordinate System	WGS 84 / UTM zone 30N
Projection	Universal Transverse Mercator (UTM)
Unit	meters
Scale at A3	1:500,000
Created	JC
Reviewed	AN/ NP
Authorised	JDM

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4.2.7.1. EGL 2

The EGL 2 – Marine Scheme Environmental Appraisal Report Volume 2 Chapter 2 – Project Description (application reference number 00009943/00011033) (Scottish Government, 2025) states that *‘the installation of the Marine Scheme is indicatively anticipated to commence in 2025 and may take up to five years to complete avoiding winter months, where feasible’* and that the location of the Scottish landfall is within Sandford Bay, crossing the RLB of the Proposed Development. Therefore, EGL 2 may have a temporal and spatial overlap with the construction of the Proposed Development, meaning there could be an in-combination effect of visual disturbance to common guillemot and European shag, if construction of the two projects overlap. The location of EGL 2 in relation to EGL 3 is illustrated in **Figure 4-2 (Drawing reference C01494-EGL3-MEA-BIRD-008)**. EGL 2 – Marine Scheme Environmental Appraisal Report Volume 2 Chapter 11 – Ornithology (MLA reference number 00009943/00011033) (Scottish Government, 2025) lists the following mitigation that has been built into the project to reduce and where possible, remove identified impacts and their effects on ornithological receptors:

- All vessels will comply with the SMWWC to protect ecological receptors;
- Lighting on-board the vessels will be kept to the minimum level required to ensure safe operations and directed towards working areas. This will minimise disturbance to seabird species;
- A 500 m wide installation corridor (referred to as the Marine Installation Corridor) has been selected to optimise the balance of environmental, technical, commercial and financial considerations, such as avoiding designated sites, known archaeological sites, recreational activities, key fishing grounds and third-party infrastructure as far as possible;
- A commitment will be included with the Construction Environmental Management Plan and implemented via the SMWWC, to ensure that transiting vessels move at low speeds allowing any rafts of birds to disperse naturally well in advance of an approaching vessel. This will minimise the energy expended and avoid unnecessary flushing, which is especially important during the immediate post breeding dispersal periods of auks from early July to mid-September; and
- HDD will be used at both landfalls for the installation of the cables in the transition zone between the Onshore Schemes and the Marine Scheme which avoids any works in the intertidal environment.

The EGL 2 Marine Licence also contains Licence Conditions 3.3.10, 3.3.11 and 3.3.12 which state the following:

“3.3.10 The Licensee must ensure that all vessels avoid travelling close to the Buchan Ness to Collieston Coast Special Protection Area (SPA) colony areas and breeding birds. Vessels must avoid the 2km marine extension of the SPA between 01 March and 15 September inclusive. The exception to this is vessels in Sandford Bay where works are taking place. If such vessels are required to travel in the SPA marine extension, they must avoid approaching cliffs where nesting birds are present and adhere to the Scottish Marine Wildlife Watching Code.

3.3.11 The Licensee must ensure that all vessels used during the course of the Licensed Activity utilise existing vessel and shipping corridors as far as reasonably practicable.

3.3.12 The Licensee must ensure that all vessels used during the course of the Licensed Activity adhere to the Scottish Marine Wildlife Watching Code.”

In addition to the embedded mitigation and licence conditions built into EGL 2, the Proposed Development has proposed both embedded and project specific mitigation measures, as detailed in **Section 4.2.5**. The mitigation proposed for the Proposed Development is aligned with that contained within the Marine Licence for EGL 2. With these measures in place, vessel movements from the Proposed Development within the Buchan Ness to Collieston SPA will be restricted during the breeding season as per the conservation objectives for the site. Any vessels required within the SPA will avoid rafting birds, areas of high bird density, limit the use of directional artificial lighting and will adhere to the SMWWC. This mitigation would minimise interference with nesting birds. Therefore, the proposed mitigation measures will remove the potential for, or significantly reduce the effect, of visual/physical disturbance or displacement on common guillemot or European shag from the Proposed Development. **In conclusion, with the implementation of the mitigation built into the Marine Scheme for EGL 2 and the proposed mitigation for the Proposed Development (Section 4.2.5), there will be no AEol on breeding common guillemot or European shag in the Buchan Ness to Collieston Coast SPA as a result of the Proposed Development in-combination with EGL 2.**

4.2.7.2. Cenoss Floating Offshore Wind Farm – transmission infrastructure

Cenoss Floating OWF’s export cable corridor crosses the Proposed Development at KP 576, utilising the DC routing of NorthConnect within 12 NM to reduce the need for additional infrastructure (Scottish Government, 2025a). Cenoss Floating OWF is currently in its permitting phase, having submitted EIA in January 2025 (application reference number: 00011091) and according to the EIA Chapter 5 – Project Description, the transmission infrastructure is scheduled to commence construction from 2030, with operation in 2031 (Scottish Government, 2025a). As such, there may be a temporal overlap in construction between the two projects. If works were to occur simultaneously, there could be in-combination effect of visual disturbance to common guillemot and European shag. The Cenoss RIAA (application reference number: 00011091) (Scottish Government, 2025a) considered disturbance within the Buchan Ness to



Collieston Coast SPA as a result of the export/import cable and states that the landfall will be installed using HDD, taking the cable out to 190 m offshore, eliminating the potential for disturbance whilst birds are at the colony. The RIAA further notes that any disturbance is expected to be highly localised, no more than 0.5 km surrounding each vessel and that any impacts will be temporary. In addition, the Cenosis RIAA outlines embedded mitigation measures relevant to ornithology receptors. The mitigation measure considered relevant to removing or reducing impacts of visual/physical disturbance or displacement as a result of the construction of the export/import cable is the adherence to a vessel management plan, including compliance with the SMWWC.

For Cenosis Floating OWF – transmission infrastructure it was determined by the Cenosis RIAA (application reference number: 00011091) (Scottish Government, 2025a) that there would be no potential for an AEol on the qualifying features of the Buchan Ness to Collieston Coast SPA as a result of vessel disturbance within the export/import cable corridor. In addition, the Proposed Development has proposed both embedded and project specific mitigation measures, as detailed in **Section 4.2.5**. With these measures in place, vessel movements from the Proposed Development within the Buchan Ness to Collieston SPA will be restricted during the breeding season as per the conservation objectives for the site. Any vessels required within the SPA will avoid rafting birds, areas of high bird density, limit the use of directional artificial lighting and will adhere to the SMWWC. Therefore, the proposed mitigation measures will remove the potential for, or significantly reduce the effect, of visual/physical disturbance or displacement on common guillemot or European shag from the Proposed Development. **In conclusion, with the determination of no AEol for Cenosis Floating OWF - transmission infrastructure and the proposed mitigation for the Proposed Development (Section 4.2.5), there will be no AEol on breeding common guillemot or European shag in the Buchan Ness to Collieston Coast SPA as a result of the Proposed Development in-combination with Cenosis Floating OWF - transmission infrastructure.**

4.2.8. Conclusion of in-combination assessment

For the Proposed Development alone, it has been concluded that there will be no AEol after the implementation of the mitigation measures detailed in **Section 4.2.5**. A key component of these measures requires vessels to avoid entering the Buchan Ness to Collieston Coast SPA (the seaward extension of which extends 2 km from the coastline) during the period 1 March to 15 September inclusive. The exception to this is vessels working within the RLB. If such vessels are required to travel in the SPA for safety of navigation purposes (or in agreement with NatureScot), they must avoid approaching cliffs where nesting birds are present and adhere to the SMWWC. Consequently, disturbance or displacement caused by vessels associated with the Proposed Development is either entirely avoided (when outside the SPA) or significantly reduced (during necessary operations within the SPA). EGL 2 has its own embedded mitigation (see **Section 4.2.7.1**) to reduce the effects of visual/physical disturbance or displacement of bird species within the SPA and Cenosis Floating OWF - transmission infrastructure determined that there would be no potential for an AEol on the qualifying features of the Buchan Ness to Collieston Coast SPA as a result of vessel disturbance within the export/import cable corridor. **In conclusion, there will be no AEol on breeding populations of common guillemot and European shag as a result of the Proposed Development, in-combination with EGL 2.**

5. Conclusion

The Stage 1 Screening identified two potential impacts which could have a likely significant effect from the Proposed Development to the Buchan Ness to Collieston Coast SPA; visual/physical disturbance or displacement and in-combination effect for visual/physical disturbance or displacement. Therefore, this site was 'screened in' and progressed onto Stage 2 AA of the HRA process (as outlined in **Section Error! Reference source not found.**).

This RIAA has been prepared to provide further information to enable the competent authority to carry out an AA to determine whether the Proposed Development could have an AEol on the Buchan Ness to Collieston Coast SPA, either alone or in-combination with other plans and projects, in view of the site's conservation objectives.

The impact of visual/physical disturbance or displacement from the Proposed Development was evaluated against the conservation objectives for the Buchan Ness to Collieston Coast SPA for common guillemot and European shag. **In conclusion, with the implementation of the mitigation proposed in Section 4.2.5, there will be no AEol on breeding common guillemot or European shag within the Buchan Ness to Collieston Coast SPA from the Proposed Development alone or in-combination with other projects or plans. Therefore, no further stages of the HRA process will be required.**



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