



# **Spiorad na Mara Offshore Wind Farm**

## **Offshore Project**

### **Offshore Report to Inform Appropriate Assessment**

#### **Appendix C: Consultation**

Document Reference No.: SNM-SNM-PAC-APP-1003

Date: February 2026



## Quality Control Page

Document details	
Document title	Offshore Report to Inform Appropriate Assessment
Document subtitle	Appendix C: Consultation
Document Reference No.	SNM-SNM-PAC-APP-1003
Date	February 2026
Version	1.0
Author	NIRAS
Client Name	Spiorad na Mara Limited

Document history						
Version	Revision	Issued	Checked	Approved	Date	Comments
1.0	A	NIRAS	WSP	SnM Ltd	February 2026	Final for submission

## Contents

1	Consultation on the Offshore RIAA.....	1-1
1.1	Introduction.....	1-1
1.2	Glossary and abbreviations .....	1-88
1.3	References .....	1-92

## List of Tables

Table 1-1	Consultation table.....	1-2
Table 1-2	Acronyms and abbreviations.....	1-88
Table 1-3	Glossary .....	1-89

# 1 CONSULTATION ON THE OFFSHORE RIAA

## 1.1 INTRODUCTION

1.1.1.1 The consultation presented here relates specifically to the **Offshore Report to Inform Appropriate Assessment (RIAA)**, hereafter referred to as '**Offshore RIAA**'. Consultation that predated issue of the Habitat Regulations Appraisal (HRA) Screening Report (Spiorad na Mara Ltd, 2024) is addressed within that report, with the exception of a limited number of comments that are specifically highlighted within that report to be addressed within the **Offshore RIAA**. Consultation relevant to the **Offshore Environmental Impact Assessment Report (EIAR)** and associated technical reporting is addressed separately within relevant chapters of the **EIAR** and not repeated here. Specifically, for marine and nearshore ornithology consultation is addressed in **EIAR Appendix 14.6: EIA Ornithology Consultation, Volume 2c**, for benthic and intertidal ecology in Section 9.3 of **EIAR Chapter 11: Benthic and Intertidal Ecology, Volume 2a**, for migratory fish in Section 12.3 of **EIAR Chapter 12: Fish Ecology, Volume 2a** and for marine mammals in Section 13.3 in **EIAR Chapter 13: Marine Mammals and Megafauna, Volume 2a**. In some instances, comments are relevant to both the **Offshore EIAR** and the **Offshore RIAA**, with those included in both – noting that the response provided here is specific to the **Offshore RIAA**.

Table 1-1 Consultation table

Consultee	Date and Forum	Comment	Applicant's Response
<b>Scoping Opinion<sup>1</sup></b>			
Marine Directorate – Licensing Operations Team (MD-LOT) Scoping Opinion and the Appended Scoping Consultation responses from stakeholders	Advice on the Environmental impact Assessment (EIA) Scoping Report December 2023 .	There could also be opportunities to collaborate with the Marine Directorate SPAN network, supporting the monitoring of harbour porpoise in the Inner Hebrides and the Minches SAC. We would welcome discussion and regular communication between the developer, nature conservation non-governmental organisation (NGOs) (such as Hebridean Whale and Dolphin Trust (HWDT) and Whale and Dolphin Conservation (WDC)), academics, Marine Directorate and NatureScot to consider a plan for monitoring cetaceans off the west coast as soon as feasible.	The conclusions of the <b>Offshore RIAA</b> for the Inner Hebrides and the Minches SAC alone are presented in Section 5 and in-combination in Section 10, with embedded mitigation provided in Section 3 of the <b>Offshore RIAA</b> . No requirement for monitoring harbour porpoise has been identified.
	Followed by May 2024 appended to the Scoping Opinion.	We also advise when considering the grade status of rivers – as it is written, the EIA Scoping Report provides an overly optimistic view of the status of Atlantic salmon based on river grade status. We highlight that the grading system does not recognise, whilst total salmon numbers may be enough to meet the Grade 1 spawning deposition target, the conservation objectives of Atlantic salmon features in SACs requires the maintenance of all genetic types. So, the grade status may not reflect the status of the SAC.	The assessment for Atlantic salmon alone is presented in Section 7 and in-combination in Section 12 of the <b>Offshore RIAA</b> . These assessments draw on <b>Offshore EIAR Chapter 12: Fish Ecology, Volume 2a</b> .
		MD-LOT provided multiple references to review/incorporate for migratory fish.: Barry, J., Kennedy, R.J., Rosell, R., Roche, W.K. (2020). Atlantic salmon smolts in the Irish Sea: First evidence of a northerly migration	References provided by MD-LOT have been used for Atlantic salmon within <b>Offshore EIAR Chapter 12, Volume 2a</b> and <b>Offshore RIAA</b> . References included where relevant to the

<sup>1</sup> As noted above, these were addressed primarily in the Screening Report – with comments remaining open at that stage and noted to be addressed within the Offshore RIAA included here  
Sporad na Mara RIAA Appendix C - Consultation

Consultee	Date and Forum	Comment	Applicant's Response
		<p>trajectory. Fisheries Management &amp; Ecology, 27, 517– 522. <a href="https://doi.org/10.1111/fme.12433">https://doi.org/10.1111/fme.12433</a></p> <p>Davidson, J.G., Plantalech Manel-la, N., Økland, F., Diserud, O.H., Thorstad, E.B., Finstad, B., Sivertsgård, R., McKinley, R.S., &amp; Rikardsen, A.H. (2008). Changes in swimming depths of Atlantic salmon <i>Salmo salar</i> post-smolts relative to light intensity. <i>Journal of Fish Biology</i>, 73(4), 1065–1074. <a href="https://doi.org/10.1111/j.1095-8649.2008.02004.x">https://doi.org/10.1111/j.1095-8649.2008.02004.x</a></p> <p>Davidson, J.G., Rikardsen, A.H., Halttunen, E., Thorstad, E.B., Økland, F., Letcher, B.H., Skardhamar, J., &amp; Naesje, T.F. (2009). Migratory behaviour and survival rates of wild northern Atlantic salmon <i>Salmo salar</i> post-smolts: Effects of environmental factors. <i>Journal of Fish Biology</i>, 75(7), 1700–1718. <a href="https://doi.org/10.1111/j.1095-8649.2009.02423.x">https://doi.org/10.1111/j.1095-8649.2009.02423.x</a></p> <p>Gilbey, J., Utne, K.R., Wennevik, V., Beck, A.C., Kausrud, K., Hindar, K., Garcia de Leaniz, C., Cherbonne, C., Coughlan, J., Cross, T.F., Dillane, E., Ensing, D., García-Vázquez, E., Hole, L.R., Holm, M., Holst, J.C., Jacobsen, J.A., Jensen, A.J., Karlsson, S., Ó Maoiléidigh, N., Mork, K.A., Nielsen, E.E., Nøttestad, L., Primmer, C.R., Prodöhl, P., Prusov, S., Stevens, J.R., Thomas, K., Whelan, K., McGinnity, P. &amp; Verspoor, E. (2021). The early marine distribution of Atlantic salmon in the Northeast Atlantic: a genetically informed stock-specific synthesis. <i>Fish and Fisheries</i>, 22(6), 1274–1306. <a href="https://doi.org/10.1111/faf.12587">https://doi.org/10.1111/faf.12587</a></p>	<p>assessment, noting that those connected to the River Derwent were not referenced, as that river is not included within the <b>Offshore RIAA</b> (as agreed with NatureScot in the HRA Screening Opinion Appendix 1 October 2024).</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>Godfrey, J.D., Stewart, D.C., Middlemas, S.J. &amp; Armstrong, J.D. (2015). Depth use and migratory behaviour of homing Atlantic salmon (<i>Salmo salar</i>) in Scottish coastal waters, <i>ICES Journal of Marine Science</i>, 72(2), 568–575, <a href="https://doi.org/10.1093/icesjms/fsu118">https://doi.org/10.1093/icesjms/fsu118</a></p> <p>Green, A., Honkanen, H. M., Ramsden, P., Shields, B., del Villar-Guerra, D., Fletcher, M., Walton, S., Kennedy, R., Rosell, R., O'Maoiléidigh, N., Barry, J., Roche, W., Whoriskey, F., Klimley, P., &amp; Adams, C. E. (2022). Evidence of long-distance coastal sea migration of Atlantic salmon, <i>Salmo salar</i>, smolts from Northwest England (river Derwent). <i>Animal Biotelemetry</i>, 10(3), 1–9. <a href="https://doi.org/10.1186/s40317-022-00274-2">https://doi.org/10.1186/s40317-022-00274-2</a></p> <p>Lilly, J.M. (2023). The behaviour of Atlantic salmon (<i>Salmo salar</i>) on first migration to sea. Unpublished PhD Thesis, University of Glasgow 288pp.</p> <p>Lilly, J., Honkanen, H.H., Rodger, J.R., del Villar, D., Boylan, P., Green, A., Pereiro, D., Wilkie, L., Kennedy, R., Barkley, A., Rosell, R., Ó Maoiléidigh, N., O'Neill, R., Waters, C., Cotter, D., Bailey, D., Roche, W., McGill, R., Barry, J., Beck, S., Henderson, J., Parke, D., Whoriskey, F.G., Shields, B., Ramsden, P., Walton, S., Fletcher, M., Whelan, K., Bean, C.W., Elliott, S., Bowman, A. &amp; Adams, C.E. (2023). Migration patterns and navigation cues of Atlantic salmon post-smolts migrating from 12 rivers through the coastal zones around the Irish Sea. <i>Journal of Fish Biology</i>, early view. <a href="https://doi.org/10.1111/jfb.15591">https://doi.org/10.1111/jfb.15591</a></p>	

Consultee	Date and Forum	Comment	Applicant's Response
		<p>Lilly, J., Honkanen, H. M., Bailey, D. M., Bean, C. W., Forrester, R., Rodger, J. R., &amp; Adams, C. E. (2022). Investigating the behaviour of Atlantic salmon (<i>Salmo salar</i> L.) post-smolts during their early marine migration through the Clyde Marine region. <i>Journal of Fish Biology</i>, 101(5), 1285– 1300. <a href="https://doi.org/10.1111/jfb.15200">https://doi.org/10.1111/jfb.15200</a></p> <p>Lothian, A.J., Newton, M., Barry, J., Walters, M., Miller, R.C., &amp; Adams, C.E. (2018). Migration pathways, speed and mortality of Atlantic salmon (<i>Salmo salar</i>) smolts in a Scottish river and the near-shore coastal marine environment. <i>Ecology of Freshwater Fish</i>, 27(2), 549–558. <a href="https://doi.org/10.1111/eff.12369">https://doi.org/10.1111/eff.12369</a></p> <p>Newton, M., Barry, J., Lothian, A., Main, R., Honkanen, H., Mckelvey, S., Thompson, P., Davies, I., Brockie, N., Stephen, A., O'Hara Murray, R., Gardiner, R., Campbell, L., Stainer, P., &amp; Adams, C. (2021). Counterintuitive active directional swimming behaviour by Atlantic salmon during seaward migration in the coastal zone. <i>ICES Journal of Marine Science</i>, 78(5), 1730–1743. <a href="https://doi.org/10.1093/icesjms/fsab024">https://doi.org/10.1093/icesjms/fsab024</a></p> <p>Nunn, A.D., Ainsworth, R.F., Walton, S., Bean, C.W., Hatton-Ellis T.W., Brown, A., Evans, R., Atterborne, A., Ottewell, D. &amp; Noble, R.A.A. (2023). Extinction risks and threats facing the freshwater fishes of Britain. <i>Aquatic Conservation: Marine and Freshwater Ecosystems</i>, early view <a href="https://doi.org/10.1002/aqc.4014">https://doi.org/10.1002/aqc.4014</a></p>	

Consultee	Date and Forum	Comment	Applicant's Response
		<p>Ounsley, J.P., Gallego, A., Morris, D.J. &amp; Armstrong, J.D. (2020). Regional variation in directed swimming by Atlantic salmon smolts leaving Scottish waters for their oceanic feeding grounds—a modelling study, ICES Journal of Marine Science, 77(1), 315–325. <a href="https://doi.org/10.1093/icesjms/fsz160">https://doi.org/10.1093/icesjms/fsz160</a></p>	
		<p>We welcome the intention to identify 'embedded mitigation' described in each of the relevant sections of the EIA Scoping Report (for example section 6.1.4). The EIA Report must clearly articulate those mitigation measures that are informed by the EIA (or HRA) and are necessary to avoid or reduce predicted significant adverse environmental effects of the proposed development. In addition, we recommend the consideration of positive enhancement measures that could be applied throughout the life span of the windfarm both on and offshore. We advise that the full range of mitigation, monitoring and enhancement measures, and published guidance, are considered and discussed in the EIA Report</p>	<p>Mitigation applied within <b>Offshore RIAA</b> is presented in full in Section 3 of the <b>Offshore RIAA</b> .</p> <p>Specifically in relation to mitigation measures for underwater noise, these are set out in more detail in Section 7.2.2 and Section 7.3.2 of the Offshore RIAA, including both embedded mitigation (including noise mitigation at source, the approach to percussive piling installation and temporal restrictions on when piling will take place), and secondary mitigation (including zoning of the percussive piling area and the inclusion of quiet periods).</p>
		<p>The report does not clearly explain what mitigation measures are being adopted for wild fish receptors (Atlantic Salmon). Therefore, Western Isles District Salmon Fisheries Board (WIDSFB) would like to ask what mitigation is being proposed to ensure smolts emanating from the Langavat SAC will not be harmed or impeded in their migration. What consideration in terms of best practice has been given to the timings and duration of the works in relation to the sensitive period when wild salmon smolts will be migrating out of Loch Roag/Ròg.</p>	

Consultee	Date and Forum	Comment	Applicant's Response
		<p>WDC and HWDT consider that new renewable energy programmes should not proceed within, or in areas adjacent to, critical cetacean habitats and Marine Protected Areas (MPAs) designated for cetaceans to avoid injury to and displacement of whales, dolphins and porpoises from important feeding and breeding areas. Outside of MPAs, it is vital that impacts are fully mitigated. For pile driving (which is one of the key impacts of concern for cetaceans in terms of potential for harm), the technology is available to mitigate noise levels and should be employed wherever pile driving takes place in United Kingdom (UK) waters (see for example, Weilgart 2023).</p>	<p>The Offshore RIAA addresses matters related to SACs only in regards to marine mammals. For other designated sites (and species not a feature of SACs) please refer to <b>Offshore EIAR Chapter 13: Marine Mammals, Volume 2a</b>. Screening conclusions are presented in Section 2, with the assessment for cetaceans presented alone in Section 5 and in-combination in Section 10 of the <b>Offshore RIAA</b>. Mitigation is presented in Section 3. For the project alone, whole project and in-combination assessments, no AEOI was concluded for marine mammals.</p>
		<p>RSPB Scotland has outstanding issues with the manner in which the bio-seasons definitions from Furness (2015) have been defined for gannet and kittiwake. This is because by using the "migration-free" seasonal definition as opposed to full breeding season the early and later months of the season are effectively excluded. For example, the kittiwake breeding season is defined as May to July, when evidence from colony monitoring shows that birds are present from April at least to August. In the latter part of the season all birds will have fledged but individual birds will still be present with both young and adult birds coming back to the cliff. These are still SPA birds, and those most likely to be affected by impacts from the development. We agree with NatureScot (2023) guidance for running CRM. Running CRM with Option 3 provides valuable context, but our decision around significance of impacts will be based on option 2. Similarly</p>	<p>As set out in the <b>Offshore EIAR Appendix 14.1: Ornithology Baseline Report, Volume 2c</b>, the seasons applied in the Offshore RIAA follow NatureScot (2020) guidance and Furness (2015). For kittiwake this gives a breeding season of mid-April to August, and for gannet this gives a breeding season of March to September.</p> <p>As set out in <b>Offshore EIAR Appendix 14.3: Collision Risk Modelling Report, Volume 2c</b> Collision Risk Modelling (CRM) was based on the Option 2 Band (2012) Model, as per NatureScot guidance. The approach to macro-avoidance is set out within that report also, in</p>

Consultee	Date and Forum	Comment	Applicant's Response				
		<p>running the models deterministically adds context particularly when looking comparatively at older developments. Although macro-avoidance is not mentioned in the EIA report, we wish to highlight that there is currently no agreed mechanism to combine collision and distributional change modelling, although a framework had been created. We agree with NatureScot that the NE approach of applying a macro-avoidance rate to gannet density prior to calculating collision risk is inappropriate for breeding birds.</p>	<p>line with the latest guidance from NatureScot (2025).</p>				
<b>Screening Consultation</b>							
NatureScot	Screening note feedback 03 April 2024	<p>The various Screening tables in the Report appear to omit pressures arising within the Offshore Cable Corridor. An example of this is Table 5-1 which includes EMF as a potential pressure on migratory fish. The Offshore Cable Corridor Area of Search is listed as a relevant project aspect, but the screening parameters only include the Offshore Development Area of Search. EMF pressure could arise from the Offshore Cable Corridor as well as the Offshore Development Area of Search and so both areas should be included as screening parameters.</p>	<p>The OCAS is included in the screening process where relevant to the pressure. To confirm, EMF is screened in for migratory fish (and freshwater pearl mussel) for both the Array Area and the OCAS (see <b>RIAA Appendix A; Confirmed Screening Conclusions</b>).</p>				
		<b>Benthic subtidal and intertidal ecology</b>		<p>Screening distances have been updated following consultation (please see response to NatureScot post scoping 21 March 2025, which addresses the use of straight lines and at sea distances for SACs) and the refinement of the OCAS. See <b>RIAA Appendix A</b> and Section 2.1 of the <b>Offshore RIAA</b> for further details.</p>			
		<p>Page 14 of the report describes shortest distances from the Project Array Area to various SAC sites containing Annex 1 habitat features. These distances appear to contain discrepancies:</p>	<table border="1"> <thead> <tr> <th data-bbox="831 1085 1111 1364">SAC</th> <th data-bbox="1111 1085 1335 1364">Shortest distance as stated in Report (km)</th> <th data-bbox="1335 1085 1491 1364">Shortest distance as measured in NatureScot GIS (km)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		SAC	Shortest distance as stated in Report (km)	Shortest distance as measured in NatureScot GIS (km)
SAC	Shortest distance as stated in Report (km)	Shortest distance as measured in NatureScot GIS (km)					

Consultee	Date and Forum	Comment	Applicant's Response												
		<table border="1"> <tr> <td data-bbox="577 339 831 496">Loch Roag Lagoons SAC (eastern component)</td> <td data-bbox="831 339 1113 496">19</td> <td data-bbox="1113 339 1473 496">10</td> </tr> <tr> <td data-bbox="577 496 831 652">Loch Roag Lagoons SAC (western component)</td> <td data-bbox="831 496 1113 652">23</td> <td data-bbox="1113 496 1473 652">11</td> </tr> <tr> <td data-bbox="577 652 831 746">North Rona SAC</td> <td data-bbox="831 652 1113 746">160</td> <td data-bbox="1113 652 1473 746">85</td> </tr> <tr> <td data-bbox="577 746 831 842">St Kilda SAC</td> <td data-bbox="831 746 1113 842">190</td> <td data-bbox="1113 746 1473 842">100</td> </tr> </table>	Loch Roag Lagoons SAC (eastern component)	19	10	Loch Roag Lagoons SAC (western component)	23	11	North Rona SAC	160	85	St Kilda SAC	190	100	
Loch Roag Lagoons SAC (eastern component)	19	10													
Loch Roag Lagoons SAC (western component)	23	11													
North Rona SAC	160	85													
St Kilda SAC	190	100													
		<p>Table 2-1 of the Report sets out potential pressures on SACs, several of these pressures use a screening parameter of 15km. If the distances from the NatureScot GIS are correct, then this would mean Loch Roag Lagoons SAC should be screened into assessment. We request that distances to SACs are checked and, if Loch Roag Lagoons SAC is confirmed to be within this screening parameter of 15km, confirmation that it will be screened into assessment.</p> <p><i>Approach to screening – do you agree with the pressures and the parameters applied to screening? We broadly support the approach that is set out in the report, however please refer to our response to Q1 above.</i></p>	Response from NatureScot noted.												

Consultee	Date and Forum	Comment	Applicant's Response
		<p><i>Any anticipated changes or additions to SAC sites in Scotland in the next 12 months that may be relevant to Sporad na Mara?</i> No. In addition we also confirm this in respect of all European sites.</p>	<p>Response from NatureScot noted.</p>
		<p><i>Any key site level research that is due to report in the next 12 months that may be relevant to Sporad na Mara?</i> We are not undertaking any specific research either within the windfarm array area of offshore export cable corridor.</p>	<p>Response from NatureScot noted.</p>
		<p><i>Any key pressure related research that is due to report in the next 12 months and relevant to bottom fixed offshore wind?</i> It is possible that relevant research projects may report within the next 12 months, for example PrePARED, PELAgIO, ScotMER. In addition, the following resource may be helpful - the Offshore Wind and Evidence Knowledge Hub (OWEKH).</p> <ul style="list-style-type: none"> <li>• <a href="https://owecprepared.org/">https://owecprepared.org/</a></li> <li>• <a href="https://ecowind.uk/projects/pelagio/">https://ecowind.uk/projects/pelagio/</a></li> <li>• <a href="https://www.gov.scot/publications/benthic-species-specialist-receptor-group/">https://www.gov.scot/publications/benthic-species-specialist-receptor-group/</a></li> <li>• <a href="https://owekh.com/home">https://owekh.com/home</a></li> </ul>	<p>Response from NatureScot noted. Where information has been available, it has been accessed during the drafting of the <b>Offshore RIAA</b> and included in the reference list appended to that document.</p>
		<p><b>Marine mammals</b></p> <p><i>Do you have preferred guidance or approach for the assessment of disturbance from underwater noise on the harbour porpoise SAC?</i> Each development should assess disturbance on a case-by-case basis. When assessing the Inner Hebrides &amp; the Minches SAC, the pressure pathway should be considered when determining connectivity, i.e. whether an activity is capable of exerting a pressure on the feature (in this case, harbour porpoise) within the SAC.</p>	<p>Response from NatureScot noted and taken into account within the Offshore RIAA. Approach to assessing disturbance with respect to the harbour porpoise SAC is outlined in Section 5.2 of the <b>Offshore RIAA</b>.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p><i>Do you agree with the current proposed approach? Yes.</i></p> <p><i>Approach to screening – do you agree with the pressures screened in/out and the parameters applied to screening?</i></p> <p>Yes, we broadly agree with the pressures screened in/out. However, we advise that vessel noise and physical disturbance should be screened in. At this stage, vessel routes and ports are unknown, but it is possible that these may add considerable additional vessel movements within the Inner Hebrides and the Minches SAC, designated for harbour porpoise.</p> <p>Regarding screening parameters – again we broadly support the proposed approach, and offer the following specific comments:</p> <ul style="list-style-type: none"> <li>For cetaceans, we advise considering the relevant management units, but modified by realistic potential ranges – in this case 200 km seems appropriate.</li> </ul> <p>For seals, we advise screening ranges of 50 km for harbour seals, and 20 km for grey seals during the breeding season, as stated.</p> <p>Additionally, we advise consideration of ranges further than this if there is tagging information to suggest SAC animals are regularly travelling to the Project site area. The Scottish Sea Mammal Research Unit (SMRU) are responsible for most seal tagging in Scottish waters. They should be approached for any appropriate tagging data that may be available.</p>	<p>Physical presence of vessels screened in for construction and decommissioning, with the operation and maintenance (O&amp;M) phase added in <b>Table 2-1</b> of the <b>Offshore RIAA</b>, and <b>RIAA Appendix A</b> (addressing physical disturbance). The pressure “underwater noise” addresses all potential sources of underwater noise, including that originating from vessels. Agreement on screening ranges applied for cetaceans noted (200 km for cetaceans), no change to screening required (50 km for harbour seal, 20 km for grey seal). Agreement on screening ranges applied for seals noted, no change to screening required. Seal screening via tagging data agreed through subsequent consultation (see response to NatureScot consultation on HRA Screening Opinion – Appendix 1, October 2024).</p>
		<p><i>Any anticipated changes or additions to SAC sites in Scotland in the next 12 months that may be relevant to Spiorad na Mara? No.</i></p>	<p>Response from NatureScot noted.</p>
		<p><i>Any key site level research that is due to report in the next 12 months that may be relevant to Spiorad na Mara? No.</i></p>	<p>Response from NatureScot noted.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p><b>Offshore and Intertidal Ornithology</b></p> <p><i>Approach to screening – do you agree with the pressures screened in/out and the parameters applied to screening?</i></p> <p>Yes, no pressures appear to have been screened out at this stage. In general terms the standard pathways of collision, disturbance, displacement and barrier effects have been captured (Table 4.1, pg. 28)</p> <p>There is no explicit mention of indirect impacts to marine birds by impacts on prey availability. Impacts to key prey species and their habitats within the wind farm area and export cable corridor should be considered across all development phases alone and in combination with other wind farms, particularly in areas of importance for foraging seabirds (Wakefield et al. 2017).</p> <p>We recognise most EIA reports concentrate on receptor specific impacts, however increasingly we need to understand the impacts at the ecosystem scale and predator/prey interactions. Consideration across key trophic levels will enable better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance on ornithological interests, and how this may influence population level impacts. Drivers of change could include habitat loss and potential changes to trophic interactions and community structure and function, including prey species compositional changes e.g., changing from those dependent on sandy substrates to those species favouring rocky substrates. Consideration of these issues can be included in chapters assessing impacts on benthic interests and fish/ shellfish, however we advise</p>	<p>Section 8.8 of the <b>Offshore RIAA</b> includes an assessment of direct impacts to prey and habitats, resulting in indirect impacts to birds.</p> <p>The assessment within the Offshore RIAA primarily uses the assessment within <b>Offshore EIAR Chapter 12: Fish Ecology, Volume 2c</b> and <b>Offshore EIAR Chapter 11: Benthic and Intertidal Ecology, Volume 2c</b>. Where one assessment draws upon the another (e.g. indirect impact on prey) there is direct reference to where to find the assessment text within which chapter and/or appendices. Please note that inclusion of hyperlinks is not possible between documents and has only been applied within documents.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>that a summary of this is included within the ornithology chapter and that clear links and references be made between the receptor chapters. We also strongly recommend the use of hyperlinks to connect associated assessments for ease of navigating.</p>	
		<p><i>Is there an update on advice on screening and assessment for migratory birds?</i></p> <p>The recently published Offshore wind strategic review (2023) should be used for assessment of migratory waterbirds.  <a href="https://www.gov.scot/publications/strategic-study-collision-risk-birds-migration-further-development-stochastic-collision-risk-">https://www.gov.scot/publications/strategic-study-collision-risk-birds-migration-further-development-stochastic-collision-risk-</a></p>	<p>The Offshore wind strategic review (Woodward <i>et al.</i>, 2023) has been applied for the HRA Screening Report (Spiorad Na Mara Ltd, 2024) and <b>RIAA Appendix A</b> and used within Section 8.6 of the <b>Offshore RIAA</b>.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>modelling-tool-work-package-1-strategic-review-birds-migration-scottish-waters/</p>	
		<p><i>Any anticipated changes or additions to SPA sites in Scotland in the next 12 months that may be relevant to Sporad na Mara?</i></p> <p>We anticipate changes to the SPA condition status across several SPAs in Scotland. This is a result of updated survey data from Seabirds Count and HPAI-related monitoring undertaken in 2023. This is anticipated in summer 2024.</p>	<p>The comment from NatureScot is noted. Impacts on SPAs are considered throughout Section 8 of the <b>Offshore RIAA</b> with reference to condition status where applicable. <b>Appendix B: Information on Designated Sites</b> includes links to site-based information including site condition. Assessment of potential adverse effects take into account the latest evidence on a colony's current population trends.</p>
		<p><i>Any key site level research that is due to report in the next 12 months that may be relevant to Sporad na Mara?</i></p> <p>As Manx shearwater and storm petrel have been recorded, the forthcoming EIA/ HRA should include an assessment of impacts on these species. The following published work and a new project relating to petrels and shearwaters should be helpful for considering potential impacts on European storm petrel:</p> <ul style="list-style-type: none"> <li>• Petrel and Shearwater Sensitivities to Offshore Wind farms – Evidence Review</li> <li>• <a href="https://www.gov.scot/publications/review-inform-assessment-risk-collision-displacement-petrels-shearwaters-offshore-wind-developments-scotland/">https://www.gov.scot/publications/review-inform-assessment-risk-collision-displacement-petrels-shearwaters-offshore-wind-developments-scotland/</a></li> <li>• OWSMRF project KG4 - JNCC report 719 Towards better estimates of Manx shearwater and European storm-</li> </ul>	<p>The impacts of artificial lighting on shearwaters and petrels is considered in Section 8.10 of the <b>Offshore RIAA</b> using published literature to supplement the Digital Aerial Surveys (DAS) results.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>petrel population abundance and trends, demographic rates and at-sea distribution and behaviour</p> <p>ProcBe – Procellariiform Behaviours and Demographics  <a href="https://jncc.gov.uk/about-jncc/jncc-blog/archive/the-procbe-procellariiform-behaviour-and-demographics-project/">https://jncc.gov.uk/about-jncc/jncc-blog/archive/the-procbe-procellariiform-behaviour-and-demographics-project/</a></p>	
		<p><i>Any key pressure related research that is due to report in the next 12 months and relevant to bottom fixed offshore wind?</i></p> <p>We expect that FeAST will be updated within the next 12 months to provide sensitivity assessments for seabirds and waterfowl.  <a href="https://feature-activity-sensitivity-tool.scot/">https://feature-activity-sensitivity-tool.scot/</a></p>	<p>Updates to FeAST were uploaded in summer 2025. It is noted that at the time of drafting, features included were geodiversity features (not relevant to the <b>Offshore RIAA</b>, habitats (not including habitats screened into the <b>Offshore RIAA</b>), fish (not including Atlantic salmon), marine birds (not including species screened in) and marine mammals (no named species given). Therefore, FeAST has not been applied to the <b>Offshore RIAA</b> as the relevant habitats and species are not included.</p>
		<p><i>Any key sites and/or features that you would expect to see included?</i></p> <p>We expect to see all sites which have connectivity (as defined by foraging ranges in Woodward <i>et al.</i>, 2019) and an impact pathway scoped into the HRA. Clear justification of any decisions regarding scoping of species and sites should be provided. We do not support scoping of sites and/ or features based on an arbitrary buffer.</p>	<p>In line with NatureScot guidance and advice, Woodward <i>et al.</i> (2019) foraging ranges have been applied throughout the technical reporting, measuring the at sea edge to edge distance between SPAs and the Offshore Project Boundary.</p>
		<p><b>Migratory Fish and Fresh Water Pearl Mussel</b></p> <p><i>Approach to screening – do you agree with the pressures screened in/out and the parameters applied to screening?</i></p>	<p>Screening distances have been updated following consultation (please see response to NatureScot post scoping 21 March 2025, which</p>

Consultee	Date and Forum	Comment	Applicant's Response									
		<p>Page 32 of the Report describes distances from the Array Area to relevant SACs with diadromous fish features. Again there are discrepancies between the distances in the report and in our own GIS:</p> <table border="1" data-bbox="577 496 1440 740"> <thead> <tr> <th data-bbox="577 496 826 655">SAC</th> <th data-bbox="826 496 1055 655">Shortest distance as stated in Report (km)</th> <th data-bbox="1055 496 1440 655">Shortest distance as measured in NatureScot GIS (km)</th> </tr> </thead> <tbody> <tr> <td data-bbox="577 655 826 699">Langavat SAC</td> <td data-bbox="826 655 1055 699">40</td> <td data-bbox="1055 655 1440 699">19</td> </tr> <tr> <td data-bbox="577 699 826 740">North Harris SAC</td> <td data-bbox="826 699 1055 740">75</td> <td data-bbox="1055 699 1440 740">30</td> </tr> </tbody> </table> <p>Please also see our comments above on the Offshore Cable Corridor Area of Search.</p> <p><i>Any anticipated changes or additions to SAC sites in Scotland in the next 12 months that may be relevant to Spiorad na Mara?</i> No.</p> <p><i>Any key site level research that is due to report in the next 12 months that may be relevant to Spiorad na Mara?</i> No.</p> <p><i>Any key pressure related research that is due to report in the next 12 months and relevant to bottom fixed offshore wind?</i> It is possible that relevant research projects may report within the next 12 months, for example PrePARED projects, ScotMER.</p> <ul style="list-style-type: none"> <li>• <a href="https://owecprepared.org/">https://owecprepared.org/</a></li> <li>• <a href="https://www.gov.scot/publications/diadromous-fish-specialist-receptor-group/">https://www.gov.scot/publications/diadromous-fish-specialist-receptor-group/</a></li> </ul>	SAC	Shortest distance as stated in Report (km)	Shortest distance as measured in NatureScot GIS (km)	Langavat SAC	40	19	North Harris SAC	75	30	<p>addresses the use of straight lines and at sea distances for SACs). See <b>RIAA Appendix A</b> and Section 2.1 of the Offshore RIAA for further details.</p> <p>Response from NatureScot noted.</p> <p>Response from NatureScot noted.</p> <p>References incorporated into the <b>Offshore RIAA</b>.</p>
SAC	Shortest distance as stated in Report (km)	Shortest distance as measured in NatureScot GIS (km)										
Langavat SAC	40	19										
North Harris SAC	75	30										

Consultee	Date and Forum	Comment	Applicant's Response
		<p><i>Any key sites and/or features that you would expect to see included?</i></p> <p>As per our EIA Scoping advice to Marine Directorate we advise that Langavat SAC (Atlantic salmon) and North Harris SAC (Atlantic salmon, freshwater pearl mussel) are screened into HRA.</p> <p>Again, as per our Scoping advice, it is possible that migratory fish from other, more distant, SACs may use the development area, as demonstrated by Lilley <i>et al.</i> (2023). We advise that the pending deployment of a fish tracking acoustic receiver array may provide evidence on connectivity to more distant SACs, and help to inform screening decisions.</p> <p>Lilley et al. (2023) - <a href="https://doi.org/10.1111/jfb.15591">https://doi.org/10.1111/jfb.15591</a></p>	<p>Both Langavat and North Harris SACs have been screened into the HRA. Please see Section 7 of the <b>Offshore RIAA</b> for further details.</p> <p>Final agreement on migratory fish SAC achieved through subsequent discussion documented below please see consultation received from NatureScot via email 21 March 2025 below) and confirmed in <b>Offshore RIAA Appendix A</b>.</p>
<p>Fisheries Management Scotland</p>	<p>HRA Screening Opinion – Appendix 1</p> <p>October 2024</p>	<p>We note, and support, the recent position that the Marine Directorate have taken - <i>"MSS do not consider it appropriate for an EIA/HRA to conclude there is no or negligible impact just because no evidence exists of the impact. MSS advise that impacts to diadromous fish must be adequately investigated, rather than relying on a lack of evidence to claim there is no impact"</i>. We believe that this statement is highly relevant to the proposed development and that more work is required to determine whether there is wider connectivity to other rivers, including SACs.</p> <p>Whilst we recognise that the HRA process is focused on the potential to have a likely significant effect on European sites of nature conservation importance, it is important to recognise that the drivers behind declines in wild salmon and sea trout, and other species of migratory fish, affect all rivers to a greater or lesser extent. In recognition that the marine phases of both Atlantic salmon and sea</p>	<p>The <b>Offshore RIAA</b> has assessed the potential for impact with respect to all pressures screened in for the SACs screened in (see <b>Offshore RIAA</b> Section 7), with these SACs and pressures agreed with NatureScot through consultation documented within this table and confirmed in <b>Offshore RIAA Appendix A</b>.</p> <p>The <b>Offshore RIAA</b> is limited to relevant designated sites and features screened in, namely Langavat SAC and North Harris SAC for Atlantic salmon and freshwater pearl mussel (FWPM) as presented in <b>Offshore RIAA Appendix A</b>; Atlantic salmon and migratory fish</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>trout are included on the list of Priority Marine Features – the habitats and species of <i>greatest conservation importance</i> in inshore waters – we consider that all relevant rivers should be fully considered in the consenting and assessment process.</p>	<p>more widely are addressed within the <b>Offshore EIAR</b> (see <b>Offshore EIAR Chapter 12, Volume 2c</b>).</p>
		<p>Thank you for getting in touch. We note, and agree with, the comments by NatureScot from May 2024, and in particular, comments regarding the status of Atlantic salmon, and the difference between rivers gradings and SAC status. We also note, and agree with, the points made by NatureScot with regard to the potential for Atlantic salmon from a large number of rivers to migrate to the West of the Outer Hebrides and potentially pass through the development site. We note the comments by the Western Isles DSFB and Outer Hebrides Fisheries Trust regarding the timing and duration of future works, should consent be granted. These comments are particularly relevant, given the potential for connectivity with salmon from a large number of rivers across the UK and Ireland.</p>	<p>Thank you for your comment. Please see the response made with respect to these comments under the Scoping Opinion response above (the first item of consultation listed).</p>
		<p>The latest HRA Screening report argues that “While Lilly et al. (2023) successfully tagged a number of salmon smolts in southwest Scotland, north west England and Northern Ireland, the tracking data does not extend as far as the Project or the ZOI and therefore no connectivity can be established between salmon from these rivers and the Project.”</p>	<p>Migratory fish SAC screening has been confirmed with NatureScot (please see consultation received from NatureScot via email 21 March 2025 below). Sites confirmed screened in are Langavat SAC and North Harris SAC.</p>
		<p>It is now well-recognised that populations of Atlantic salmon have rapidly deteriorated across their native range. In the latest species reassessment by the IUCN Red List of Threatened Species, released in December 2023, Atlantic salmon have been reclassified from ‘Least</p>	<p>Noted. Atlantic salmon have been screened into the Offshore RIAA for assessment with respect to the SACs. Wider consideration of Atlantic</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>Concern' to 'Endangered' in Great Britain (as a result of a 30-50% decline in British populations since 2006 and 50-80% projected between 2010-2025), and from 'Least Concern' to 'Near Threatened' in terms of global populations (as a result of global populations declines of 23% since 2006). We therefore have an obligation to ensure that Atlantic salmon are protected and restored across Scotland and the wider UK.</p>	<p>salmon provided within <b>Offshore EIAR Chapter 12, Volume 2a.</b></p>
National Trust for Scotland	<p>HRA Screening Opinion – Appendix 1</p> <p>October 2024</p>	<p>The National Trust for Scotland (the Trust) is very pleased that the concerns we raised in December 2023 with respect to what SPAs should be included in the Scoping Report were addressed. Including the Mingulay and Berneray SPA, St Kilda SPA, and Seas Off St Kilda SPA (all of which contain seabird colonies the Trust cares for) in the HRA Screening Report ensures it is more comprehensive, and that appropriate levels of scrutiny is given to the impacts on vulnerable seabird colonies. The Trust commends the developer for working with us to address our concerns, as we are eager to facilitate the expansion of offshore windfarms in a way that also offers the best protection for seabirds. However, there are four instances where species advised for inclusion by the Trust have not been scoped into the HRA Screening Report. We believe there is adequate data and/or it would be in line with the Precautionary Principle to include these species. The species are:</p> <ul style="list-style-type: none"> <li>• St Kilda SPA: Leach's Petrel;</li> <li>• Seas off St Kilda SPA: Fulmar;</li> <li>• Mingulay and Berneray SPA: Fulmar and Guillemot.</li> </ul>	<p>In line with NatureScot guidance and advice, Woodward <i>et al.</i> (2019) foraging ranges have been applied, measuring the at sea edge to edge distance between SPAs and the Offshore Project Boundary. Confirmed screening is provided in <b>Offshore RIAA Appendix A.</b> Leach's petrel has been assessed in the <b>Offshore RIAA</b> for potential adverse effects from artificial lighting (Section 8.10). Leach's petrel was not taken through to Section 8.6 of the <b>Offshore RIAA</b> due to lack of measurable impact, but is assessed as part of the migratory CRM (as detailed in <b>Offshore EIAR Appendix 14.4, Volume 2c</b>).</p> <p>Guillemot from the Mingulay and Berneray SPA were not included within the Offshore RIAA, as there is no connectivity, with the site approximately 181 km from the Offshore Project, far beyond a guillemot's foraging</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p><b>St Kilda SPA: Leach's Petrel</b></p> <p>Leach's Petrel was screened out of the assessment based on low abundances. Given the rapidly declining status of Leach's Petrel and the importance of St Kilda to the species, the Trust strongly advises the species is included in the HRA. We disagree that the abundance is considered too low to warrant further consideration.</p> <p>Moreover, although information to inform assessments on procellariiforms (including Max shearwater and Fulmar) may be data deficient (partially due to lack of effort to collect data on these species and technological limitations), technology has advanced and work is now being carried out to fill these data gaps. Storm-petrels especially are known to be difficult to detect using current survey methods (e.g. Digital Aerial Surveys), which has been identified as a knowledge gap by Offshore Wind Strategic Monitoring and Research Forum. JNCC, in partnership with the University of Oxford, RSPB and the University of Gloucestershire, are currently undertaking work in this area (which includes Trust sites) and it is expected to be completed by December 2026. Leach's petrels are also currently the subject of a tracking study on St Kilda managed by RSPB. It would be</p>	<p>range. Fulmar from the Mingulay and Berneray SPA is included within the assessment of barrier effects (Section 8.4 of the <b>Offshore RIAA</b>). Fulmar has been included for the assessment of barrier effects (Section 8.4 of the <b>Offshore RIAA</b>) from the St Kilda SPA which is used as a proxy for the Seas off St Kilda SPA.</p> <p>As agreed with NatureScot, Leach's petrel and European storm petrel and Manx shearwater have been qualitatively assessed within Section 8.10 of the <b>Offshore RIAA</b> for potential responses from artificial lighting. Leach's petrel was not taken through to Section 8.6 of the <b>Offshore RIAA</b> due to lack of measurable impact, but is assessed as part of the migratory CRM (as detailed in <b>Offshore EIAR Appendix 14.4, Volume 2c</b>).</p> <p>Fulmar has been assessed for barrier effects (Section 8.4 of the <b>Offshore RIAA</b>) only. Sites screened in for Manx shearwater, Leach's petrel, European storm petrel and fulmar are confirmed in <b>Offshore RIAA Appendix A</b>. No interim results that would inform the assessment of these species were shared with the Applicant.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>pertinent for the applicant to use any interim results that may be available to consider these species in further assessments. This is particularly important when we consider the vulnerability of Leach's petrels – they have declined by 79% since 2000 (Seabird Census 2023) and are listed as vulnerable to global extinction on the IUCN Red List. Coupled with this vulnerability is the fact that St Kilda is home 93% of the total UK population, meaning impacts on the St Kilda colonies would in fact have a significant population-level impact.</p>	
		<p><b>Seas off St Kilda SPA: Fulmar</b>            Fulmar have been screened out based on low vulnerability scores for collision and displacement impacts. We question how robust this evidence base is, as recent reviews suggest Fulmar may be sensitive to both collision and displacement (Deakin <i>et al.</i>, 2022). Fulmar has also been identified as one of the most sensitive species with respect to the Trollvind, a windfarm off the Norwegian coast (Ollus <i>et al.</i>, 2023). Further evidence of the need to include Fulmar is the Trust's tracking data from Summer 2011 (which was highlighted in our submission in 2023) which shows some activity of St Kilda fulmars new Lewis. The Trust's own count in 2023 found that fulmars on St Kilda have declined by a 69% since 1999, which emphasises the need to include Seas off St Kilda Fulmar in the HRA.</p>	<p>As agreed with NatureScot, fulmar has been qualitatively assessed within the <b>Offshore RIAA</b>, for barrier effects (Section 8.4 of the <b>Offshore RIAA</b>). Sites screened in for fulmar are confirmed in <b>RIAA Appendix A</b>.</p>
		<p><b>Mingulay and Berneray SPA: Fulmar and Guillemot</b>            The Trust would encourage the Applicant to include fulmars based on the evidence presented by us in 2023. Although no direct seabird tracking data currently exists data for Mingulay and Berneray SPA,</p>	<p>Guillemot has not been included within the <b>Offshore RIAA</b> for Mingulay and Berneray SPA due to the SPA being 180.9 km from the Offshore Project Boundary and therefore over</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>data from the European a Sea Surveys shows high concentrations of Fulmar, Guillemot and Razorbill (as well as other species), around the array area in both winter (annuary) and during the breeding season (July).</p> <p>Digital aerial survey (DAS) data has also confirmed these species to be present in the array area in sufficient numbers to warrant inclusion in assessments. Although these concentrations cannot be attributed to specific colonies, we do know the Mingulay and Berneray SPA is particularly important for these species, meaning it would be prudent to include them in the HRA for this SPA.</p>	<p>the foraging range of guillemot (95.2 km: mean-max (MM) + 1 standard deviation (SD) excluding data from Fair Isle).</p> <p>As agreed with NatureScot, fulmar has been qualitatively assessed within the <b>Offshore RIAA</b> for barrier effects (Section 8.4), with sites screened in for fulmar confirmed in <b>RIAA Appendix A</b>.</p>
		<p>It is also important to include Guillemot in the HRA for the Mingulay and Berneray SPA because there is high variability and low confidence around the foraging radius of Guillemot, meaning it is impossible to be confident that the Mingulay and Berneray colony will not be impacted by the development.</p> <p>The distance from the proposed site to Mingulay is 195km and the NatureScot recommended foraging range for Guillemot is of 95.2km.</p> <p>The Trust appreciates the applicant is following NatureScot guidance by not including Guillemot in the HRA, however foraging radii are widely accepted to be highly variable between colonies, years and individuals (Cleasby et al, 2023; Woodward et al., 2024). Guillemot foraging ranges are less well documented and classed as low confidence (Woodward et al., 2024), although available tracking data does show their foraging ranges can be just as large as that of Razorbill (Wakefield et al., 2017; Woodward et al., 2024).</p>	<p>As set out in <b>Table 1-1 in Offshore RIAA Appendix A</b>, guillemot is screened in for several SPAs. However, following NatureScot guidance and advice, SPA connectivity has been established using MM +1 SD foraging ranges from the edge of the SPA to the edge of the Offshore Project Boundary.</p> <p>Guillemot has not been included for the Mingulay and Berneray SPA due to the SPA being 180.9 km from the Offshore Project Boundary and therefore over the foraging range of guillemot (95.2 km: MM + 1 SD excluding data from Fair Isle).</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>The Trust is concerned that guillemots in the SPA have not been included in the HRA because of a poor understanding of their foraging ranges due to a lack of tracking data, rather than because there is a body of evidence showing that they are unlikely to be using the array area. Therefore, we strongly recommend guillemots are included in further assessments.</p> <p>Finally, we observed that the application says guillemots should be considered further but then does not include them in table 5.11 or 5.8 for Mingulay. The Trust queries if leaving Guillemot out of tables 5.11 and 5.8 is an error because the application does not directly state that Guillemot is being discounted or provide explanation as to why.</p>	
NatureScot	HRA Screening Opinion – Appendix 1  October 2024	<p><b>Benthic Subtidal and Intertidal Ecology</b></p>	<p>Noted. Response to the issues raised provided in the rows immediately below.</p> <p>Screening has been updated following consultation and confirmed in <b>RIAA Appendix A</b>. Both Loch Roag and Traigh na Berie SACs are screened in for the Array Area based on the 15 km screening distance.</p>
		<p>Overall, we are content with the conclusions reached for benthic features, with the exception of the issues discussed in more detail below. The assessment for benthic features is based on the Zone of Influence of 15km, which is described as a precautionary approach being used until project specific reporting is available. Once available, the ZoI will be reviewed and revised if necessary. We are content with the approach proposed.</p>	
<p>Loch Roag, Traigh na Berie, St Kilda and North Rona SACs are identified for consideration, with only Loch Roag being screened in. However, our view is that Traigh na Berie SAC should also be screened in as it lies within the 15km ZoI.</p>			

Consultee	Date and Forum	Comment	Applicant's Response
		<p>In our scoping response, we did not mention Tràigh na Berie SAC but there was some confusion about distances at the time. Now that distances have been provided, our view is that this site should be considered.</p>	<p>The Tràigh na Berie SAC is screened in for the same pressures as the Loch Roag SAC.</p>
		<p>We are in agreement with the conclusion to screen out St Kilda and North Rona SACs.</p>	<p>Noted and agreed.</p>
		<p><b>Marine Mammals</b></p> <p>According to Carter <i>et al.</i>, 2022, the developers have identified that there could be grey seal connectivity with the Monach Isles SAC. We note their approach in screening this SAC in, however we wish to emphasise that unless the telemetry data shows regular use of the site (i.e. not single sightings of animals) then we are content to screen out this SAC. However, without having sight of the data used for screening, we are content to screen the SAC in as a precaution. In the initial stage of selecting potential receptors (section 3.2.2), the assessment applied a 50km distance for harbour seal and a 20km distance for grey seal, and used telemetry studies to understand connectivity from any sites further than these distances. We are content with the approach for seal SACs.</p>	<p>Noted and screened out based on new data (with this decision confirmed with NatureScot as documented below during the 16 April 2025 meeting).</p>
		<p>In table 5-2, we note that Moray Firth SAC is screened out while the Inner Hebrides and the Minches SAC and the Monach Islands SAC are screened in and NatureScot agree with this approach. However, all the impacts that could affect marine mammals (as per the EIA, indirect impacts on prey species, for example) should be included, not just disturbance from noise, physical structures and vessels.</p>	<p>Indirect impacts on prey species screened in for the Inner Hebrides and the Minches SAC with physical presence (of vessels) added for the O&amp;M phase (see <b>RIAA Appendix A</b>). Approach to assessment described in Section 5.2.4 of the <b>Offshore RIAA</b>, assessed in Section 5.5. These changes were confirmed with NatureScot as</p>

Consultee	Date and Forum	Comment	Applicant's Response
			documented below during the 16 April 2025 meeting.
		Although not part of the HRA process, we advise that the Risso's dolphin feature of North-East Lewis MPA is assessed and considered in the EIA, especially until more is known about noise contours.	Noted. This species has not been included within the <b>Offshore RIAA</b> , as it is not a feature of the designated sites screened in. Please refer to the <b>Offshore EIAR Chapter 13, Volume 2a</b> for assessment of this feature.
		Table 7-2 sets out the impacts on each of the SACs where LSE cannot be ruled out. While we agree with what is presented, we would advise more detail on the specific sources of impact. For example, we would expect noise from piling, other non-piling/continuous noise source construction activities, vessels, UXO and geophysical surveys to be separated to be considered individually at the next stage in the HRA process.	Further detail per impact source, including listed sources, can be found in Section 5.2 of the <b>Offshore RIAA</b> . Underwater noise is included as a specific pressure, covering all sources of underwater noise from the Offshore Project.
		<b>Otter</b>	
		Impacts to otter in the marine environment should be considered as they may be connected to the population of the Lewis Peatlands SAC. We note that otter as an interest of this site are mentioned in the section on terrestrial impacts, however, we advise that the developer will need to consider the impacts to otters in the marine environment within 10km of otter SACs.	Otter is screened in onshore for the Lewis Pentland SAC, with otter also screened into the <b>Offshore RIAA</b> and assessed in Section 6 for the Offshore Project alone and Section 11 for the Offshore Project in-combination, with the pressures screened in remaining the same (see <b>RIAA Appendix A</b> ).
		<b>Ornithology</b>	
		We advise that disturbance from vessels is screened into assessment from the perspective of visual disturbance, and that vessel movements between the development area and the port from which	An assessment of disturbance and displacement from vessels outside the Turbine Area is presented within Section 8.6 of the <b>Offshore</b>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>they will operate are also considered, where impacts on SPA features are likely.</p>	<p><b>RIAA.</b> Some details, such as operational port location, will not be determined at the RIAA stage, as is typical of offshore wind farm projects.</p>
		<p>Distributional responses (this is referred to as physical presence in the report), collision and artificial lighting have been screened into the assessment. Vessel disturbance is considered, but only in the context of above water noise, they also screen out disturbance or displacement from vessel movements beyond 2 km of the Array Area and offshore cable corridor. They screen out 'direct physical impact (to habitat)'. We advise that disturbance from vessels is screened into the assessment from the perspective of visual disturbance, and that vessel movements between the development area and the port from which they will operate are also considered, where impacts on SPA features are likely.</p>	<p>A qualitative assessment of disturbance and displacement from vessels outside the Turbine Area is presented within Section 8.5 of the <b>Offshore RIAA.</b></p>
		<p>Impacts to key prey species and prey habitats within the wind farm area should be considered across all development phases alone and in combination with other activities in the development area, particularly in areas of importance for foraging seabirds (Wakefield <i>et al.</i>, 2017). We increasingly need to understand the impacts at the ecosystem scale and predator/prey interactions. Consideration across key trophic levels will enable better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance on ornithological interests, and how this may influence population level impacts. Drivers of change could</p>	<p>Impacts to key prey species and prey habitats have been assessed across all phases of the Offshore Project as identified through the updated screening (see <b>RIAA Appendix A</b>). The indirect impact is then assessed within Section 8.8 of the <b>Offshore RIAA.</b></p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>include habitat loss and potential changes to trophic interactions and community structure and function, including prey species compositional changes e.g. changing from those dependent on sandy substrates to those species favouring rocky substrates.</p>	
		<p>Impacts on prey availability does not appear to have been considered in the HRA Screening Report and is absent from Table 5-3 which lists pressures screened in/ out of further consideration. We advise that this impact pathway should be screened into further assessment</p>	
		<p>The use of the foraging range tool is appropriate to developing the longlist, however the apportioning tool uses a geometric centre to geometric centre measurement which is not appropriate at stage 3 of HRA. This results in multiple different 'distances to project' for various species – see for example North Rona and Sula Sgeir SPA or Flannan Isles SPA.</p> <p>We do not support the apportionment advice being applied to the assessment of connectivity. The assessment of connectivity should be calculated from the edge of the development area to the edge of the SPA.</p>	
		<p>Furthermore, Foula SPA is considered in the long list but Seas off Foula SPA is not – this should be scoped into the long-list on the basis of connectivity with breeding seabirds such as great skua and fulmar. We also note that Kittiwake at Troup, Pennan and Lion's Head Spa is scoped in despite being beyond the foraging range for this species.</p>	

Consultee	Date and Forum	Comment	Applicant's Response
		<p>Both table 5-4 and section 7.4 note species which qualify as named component of the assemblage. It is not clear if the assessment intends to treat them differently as a result. We advise that in Scotland we treat these in the same way as qualifying species.</p>	<p>Great skua was not screened in under the HRA Screening Report (Spiorad Na Mara Ltd, 2024) as a consequence of extremely low numbers. Those low numbers remained apparent in the full DAS and the species is scoped out as a Valued Ornithological Receptor (VOR), with the <b>Offshore EIAR Appendix 14.1, Volume 2c</b> estimating a bird density 0.02 birds per km<sup>2</sup> for the months in which the species occurred and has therefore not been carried through the screening process to identify sites. However, to ensure the species is included within the assessment process it has been assessed in migratory CRM (see <b>Offshore EIAR Appendix 14.4, Volume 2c</b>). No change to screening required.</p> <p>Kittiwake has been screened out for Troup, Pennan and Lion's Head SPA as the SPA is 339 km from the Offshore Project Boundary and therefore over the foraging range of kittiwake (330.6 km MM+1SD) (see <b>Offshore RIAA Appendix A</b>).</p> <p>Named components of an assemblage have been assessed in full throughout Sections 8 (Offshore Project alone) and 13 (Offshore Project in-combination) of the <b>Offshore RIAA</b>.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>Table 5-4 required review on the basis of the above advice.</p> <p>The reports states that connectivity has been identified for 9 species (fulmar, gannet, great skua, guillemot, kittiwake, Manx shearwater, puffin, razorbill and storm petrel). However, this discounts Leach's petrel which is within connectivity distance for Flannan Isles SPA, Foula SPA, North Rona and Sula Sgeir SPA, Ramna Stacks and Gruney SPA, St Kilda SPA and Sule Skerry and Sule Stack SPA. HRA screening of species has been undertaken on the basis of only 12 months of DAS data. We have not seen the Final 2 Year DAS report, and we advise that screening should be based on the full 2 years of DAS data to determine LSE.</p> <p>Petrels - The Applicant notes an intention to scope out petrels from LSE due to low numbers recorded in their DAS. We disagree with this approach and note that RSPB advised on this in May 2024. Given the challenges of undertaking a quantitative assessment for petrels based on the limitations of the survey technique for detecting and estimating populations for these species, we advise that a qualitative assessment can be undertaken. Tagging and tracking work from various petrel colonies could be used to inform this assessment (e.g. Mousa, St Kilda and Treshnish Isles). We agree with the representation from RSPB in May 2024 that petrels should not be scoped out on the basis of low numbers recorded on DAS - "The lack of observations of these species in the DAS data has been noted (see Section 6.7.3.5) and limited data available or more sparsely spread distribution when considering foraging ranges has been suggested as reasons why this may be. Mindful of the characteristics of procellariiforms (i.e. they are</p>	<p>At the time of writing the HRA Screening Report (Spiorad Na Mara Ltd, 2024) only 12 months of DAS had been completed and analysed. 24 months of DAS has been used to inform <b>Offshore RIAA</b> and the updated HRA screening in <b>Offshore RIAA Appendix A</b>. Leach's petrel has been included within the assessment of 'response to artificial light' (Section 8.10 of the <b>Offshore RIAA</b>).</p> <p>As agreed with NatureScot, qualitative assessments have been undertaken for European storm petrel and Leach's petrel, with regards to artificial lighting (see Section 8.10 of the <b>Offshore RIAA</b>).</p> <p>The migratory CRM (<b>Offshore EIAR Appendix 14.4, Volume 2c</b>) concluded less than 1 individual per year for European storm petrel and Leach's petrel. Therefore, no apportioning to site has been undertaken and no change to the screening conclusions for these species in relation to these impacts.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>relatively small birds and tend to fly outside the day light hours) and the timings of the DAS (i.e. during the middle of the day), RSPB Scotland considers it likely this type of species will be under recorded in DAS. It is not appropriate to screen out these receptors on this basis. Impacts to these species should be scoped in."</p>	
		<p>Great skua - The developer also notes an intention to scope out great skua on the basis that they were seen in low numbers within one breeding season. We advise that great skua is not scoped out on the basis of this one season of data. This is particularly important given that the data was collected during the height of the outbreak of Highly Pathogenic Avian Influenza (HPAI) in great skua which resulted in a 77% decline in the UK breeding population (Tremlett et al., 2024).</p>	<p>Great skua has been scoped out as a VOR based on 24 months of data (<b>Offshore EIA Appendix 14.1, Volume 2c</b>), but nevertheless has been assessed for migratory CRM (see <b>Offshore EIA Appendix 14.4, Volume 2c</b>). The migratory CRM (<b>Offshore EIA Appendix 14.4, Volume 2c</b>) concluded less than 1 individual per year for great skua. Therefore, no apportioning to site has been undertaken and no change to the screening conclusions for these species in relation to these impacts.</p>
		<p>The developer presents an assessment of vulnerability of the species within connectivity distance. To do so they use the Wade et al., 2016 paper. They have translated the scoring from that paper into levels of vulnerability e.g. high, moderate, low etc. However, it is not always clear how this was done. For example, the impact pathway 'physical presence' (distributional effects) have been translated. We would have expected these scores to come from supplementary table 7 (vulnerability to displacement and disturbance). However, the scores differ, e.g. Kittiwake has a score of 8 not 2 and guillemot has a score</p>	<p>Vulnerability is applied before the assessment stage and is used to help determine screening conclusions and to identify species for inclusion in CRM and distributional response. Agreement with NatureScot on which species to consider for which impact within the <b>Offshore EIA</b> and <b>Offshore RIAA</b> has been reached.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		of 24 not 4. Clear explanation of where each score has come from will be required in the assessment.	
		In addition, the assessment of above water noise appears to have come from the assessment of vessel and helicopter impacts on displacement and disturbance from Wade <i>et al.</i> , 2016. This does not explicitly assess above water noise, and we would expect that a significant proportion of the displacement from vessels is likely to be from visual disturbance.	The Physical Presence (distributional effects) pressure includes visual disturbance from vessel movements, and this is considered in Sections 8.3 and 8.5 of the <b>Offshore RIAA</b> . Where above water noise is assessed, the relevant parameters from the Offshore Project description are clearly identified for assessment.
		Impacts on prey availability does not appear to have been considered in the HRA Screening Report and is absent from Table 5-3 which lists pressures screened in/ out of further consideration. We advise that this impact pathway should be screened into further assessment.	Indirect effects on prey is screened in as included in <b>RIAA Appendix A</b> and has been assessed in Section 8.8 of the <b>Offshore RIAA</b> .
		In undertaking the assessment for migratory birds, the recently published Offshore wind strategic review (2023) should be used for assessment of migratory waterbirds and the WWT & MacArthur Green 2014 report should be used for seabirds. The scoping of migratory non-seabirds is appropriate.	The advice provided by NatureScot is noted and agreed. The Offshore wind strategic review (Woodward <i>et al.</i> , 2023) and the WWT & MacArthur Green (2014) report have been applied for the HRA Screening Report (Spiorad Na Mara Ltd, 2024) and the <b>Offshore RIAA Appendix A</b>
		The screening should cover the species which functionally use the site/migrate through it (i.e. species whose populations breeding in Iceland/Greenland/Canada primarily pass through the area on spring and autumn migrations), therefore wintering waterbirds (grebes, divers, ducks, geese. swans, waders) should be the main focus and so many species and some SPAs can therefore be screened out.	The migratory collision risk modelling (mCRM) has been undertaken using the migratory pathways as set out in the mCRM tool (HiDef, 2022). This has included species such as corncrake and dotterel, as set out in <b>Offshore EIAR Appendix 14.4, Volume 2c</b> . Migratory

Consultee	Date and Forum	Comment	Applicant's Response
		<p>Examples are any breeding corncrake, dotterel, divers, etc. Checking of breeding ranges and likelihood of presence during migration and status in the Outer Hebrides would identify these as having no or negligible connectivity.</p>	<p>non-seabirds are considered within Section 8.6 of the <b>Offshore RIAA</b>.</p>
		<p>There also seems to be inconsistent treatment of some species e.g. a conclusion of no LSE is reached for scaup for Lough Neag SPA, but LSE is concluded for Dornoch Firth and Loch Fleet SPA etc., similarly ruff at several English SPAs but ruff don't breed in Iceland/Greenland and any likely presence is passing through the site is minimal (this species is a scarce migrant and rare breeder in Outer Hebrides).</p>	<p>The HRA screening of migratory species is presented in <b>RIAA Appendix A</b>. For clarity, all named species have been taken forward to <b>Offshore EIAR Appendix 14.4, Volume 2c</b> to determine at species level where risk of collision applies. Apportioning of the results was undertaken in line with NatureScot advice received 21 August 2025, clarifying where connectivity actually exists.</p>
		<p>The paragraph 5.4.1.22 on the barrier effect is slightly simplistic and suggests LSE can be screened out. Whilst the references given do state that additional energetic costs are relatively low their modelling did not factor in impacts of weather during migration, nocturnal flights etc. and the authors note that the energetic cost of avoiding a wind farm is additional to any impacts caused by other factors. The screening statement also doesn't factor in that the avoidance energetic cost is an ongoing, potentially twice, yearly additional energy cost not a one-off as suggested.</p>	<p>As agreed with NatureScot, an assessment of barrier effects only required for fulmar. This has been presented within Section 8.4 of the <b>Offshore RIAA</b>.</p>
		<p>Paragraph 3.2.5.3 appears to be listing the Lewis Peatland SPA qualifying birds but incorrectly includes curlew, which is not a qualifying interest at this site.</p>	<p>Species considered within the <b>Offshore RIAA</b> are presented in <b>Offshore RIAA Appendix A</b>. Specifically on curlew, this is no longer included.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		The screening of sites and species within connectivity during the non-breeding season and migratory seasons has been undertaken using the BDMPS. We agree with this approach and the exception used for guillemot during the non-breeding season.	Agreement on approach is noted.
		The developers note that there are no SPAs which overlap with the ZOI. For marine SPAs this is 15km. We agree that there is no overlap between the ZOI and any marine SPAs, and therefore there is no LSE for the features of any marine SPA.	Agreement on approach is noted.
		<b>Migratory Fish and FWPM</b>	
		As mentioned in our previous responses there still seems to be some ambiguity on distances. In the HRA three distances are provided for distances from each Atlantic salmon SAC and we are not entirely clear what the distances 'at sea' refers to.	At sea distances apply where a straight line would cross land. Distances have been updated in <b>RIAA Appendix A</b> .
		For freshwater pearl mussel (FWPM) in North Harris SAC, sea trout will also be a host – so like Atlantic salmon, anything which has the potential to impact Atlantic salmon/sea trout populations has the potential to impact FWPM. We suggest that, whilst it is unlikely that the development will impact the freshwater habitats that support either salmonid species or FWPM, it may have the potential to impact either of the salmonid species which are essential for FWPM to complete its life cycle.	Potential impacts on FWPM through sea trout as hosts has been considered in Section 7 of the <b>Offshore RIAA</b> .
		In our response to MD-LOT we stated that the River Derwent SAC and Atlantic salmon originating from rivers in other parts of GB and Ireland may be come into contact with the proposed development (e.g. Lilly, 2023; Rogers et al. 2024). However, we are aware evidence is currently a bit patchy. We therefore agree with the conclusion to	It is noted that there is agreement to screen out the River Derwent SAC. Matters for the EIAR are addressed within <b>Offshore EIAR Chapter 12, Volume 2a</b> . Potential need for further data

Consultee	Date and Forum	Comment	Applicant's Response
		screen out the River Derwent. However, this river as well as other natal rivers for Atlantic salmon should still be considered as part of the EIA. In addition, the developers may wish to be involved in more strategic salmonid tracking studies on the west coast.	collection is addressed in Section 7.3.2 of the <b>Offshore RIAA</b> .
		We agree with the conclusion to screen in North Harris and Langavat SACs.	Noted.
		For Table 7-5 for North Harris SAC we would prefer to see Atlantic salmon screening/LSE information presented separately rather than being amalgamated with other qualifying species and habitat features.	Noted. The presentation adopted was for consistency between receptor groups, but the <b>Offshore RIAA</b> (Section 7) is clear on the feature being assessed.
		We question whether disturbance in coastal areas (which may mean that post-smolts avoid areas of high activity during all stages of development, operation and decommissioning) may equate to a potential loss of (coastal/marine) habitat. This also applies to sea trout, which may support FWPM.	Noted. Potential for disturbance from underwater noise is screened in for all Offshore Project phases, with wider project disturbance also screened in for example physical presence of vessels, and are considered in Section 7 of the <b>Offshore RIAA</b> .
		The INNS assessment suggests no risk during construction and decommissioning. Construction means bringing material into the site from elsewhere, so that would present a risk, and decommissioning a structure and transporting material (which may also include INNS) to another location. In terms of import and export acting as vectors for introduction of INNS we are of the view that the construction phase does present a risk.	INNS during construction and decommissioning has been screened into the assessment for migratory fish and FWPM, in addition to O&M. See <b>Table 2-1</b> of the <b>Offshore RIAA</b> for further information.
		The list of pressures listed for each phase of the project is useful, but it is not obvious where increased risk of predation is located – particularly whilst others (INNS) is mentioned specifically despite	Pressures applied draw on the tool developed for screening. EMF is included as a specific pressure, operation noise is included in the

Consultee	Date and Forum	Comment	Applicant's Response
		<p>being identified as being a lower priority within the ScotMER Evidence Map. We assume it may be included in 'Physical Presence (of structure)' but this isn't clear. We have mentioned EMF, Operational Noise (UW noise) Disruption (light/shadow flicker) and increased risk of predation as key potential pressures, so whilst they may be rolled into one or more of the list provided in Table 5-14, it would be useful to see these things cited explicitly. We agree with the conclusion in table 5-14 for each feature within the Langavat and North Harris SACs.</p>	<p>underwater noise pressure, light/shadow flicker is addressed under physical presence of structures (noting that flicker was subsequently agreed as screened out, see response dated 21 March 2025) and increased risk of predation is addressed under physical presence of structures.</p>
RSPB Scotland	<p>HRA Screening Opinion – Appendix 1  October 2024</p>	<p>General Comments The UK is of outstanding international importance for its breeding seabirds and wintering marine birds. As with all Annex I and regularly migratory species, the UK has a particular responsibility under the Birds Directive to secure their conservation. Their survival and productivity rates can be impacted by offshore windfarms directly (i.e. collision) and indirectly (e.g. displacement from foraging areas, additional energy expenditure, potential impacts on forage fish and wider ecosystem impacts such as changes in stratification). RSPB Scotland encourage the adoption of a precautionary approach to the identification of relevant protected sites for seabirds with clear methodology on the exclusion of sites and species. We generally agree with the collection and analysis methods advised by NatureScot, with some exceptions as set out below. We recommend use of the guidance notes available on their website to inform assessment. If an Applicant chooses to undertake supplementary modelling using alternative parameters to that recommended, we</p>	<p>RSPB Scotland's comments are noted. The decision on the HRA process will be made by the competent authority. Within the Offshore RIAA, the precautionary approach has been presented and assessed in line with NatureScot's guidance.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>suggest this is clearly labelled. As set out in Searle et al (2023)<sup>1</sup>, assessing impacts of offshore windfarms and other renewables developments is inherently uncertain. This uncertainty is propagated throughout the impact assessments, as there are not only direct impacts, but ecosystem wide impacts that can change, for example, the abundance and availability of prey. Multiple data sources and modelling techniques are used to capture a simplified version of reality. They do not fully capture the complexity of seabird behavioural or demographic processes in a dynamic marine environment. Not recognising these uncertainties risks poorly informed decisions being made. Furthermore, an underestimation of impacts will have repercussions when consenting later offshore wind development. If a precautionary approach is taken from the beginning, the likelihood of irreversible damage occurring is reduced even whilst our knowledge base is incomplete, and modelling improves.</p>	
		<p>We note that many details are yet to be confirmed, with numerous options remaining under investigation, including cable installation options, Grid Substation and SSEN Converter Substation locations, and associated lighting requirements, for example. It is therefore not straightforward for RSPB Scotland to identify with certainty what the likely significant effects of the development might be. Whilst it is not RSPB Scotland's role to advise on such matters, RSPB Scotland questions whether it might have been better to delay the submission of the HRA Screening Report until the proposals are more refined. It would have helped if the numerous options were mapped to assist</p>	<p>These comments are predominately in regard to onshore ecology. The OTW Project is progressing under a separate application, with the Onshore RIAA to be submitted subsequent to the offshore application. Within the Offshore RIAA, the OTW is included with respect to the whole project assessment made where the same site and feature is screened in onshore and offshore (see Section 6.7 for otter and</p>

Consultee	Date and Forum	Comment	Applicant's Response
		with their visualisation. We note the reference in paragraph 2.1.2.4 to 'interconnector cables being needed to link OSPs with larger offshore array areas', and question which larger array areas the applicant is referring to, and whether the applicant is aware of other proposals which are not at such an advanced stage of development, and which may need to be factored into 'in-combination' assessments.	Section 8.13 for Marine and Nearshore Ornithology.
		Due to capacity constraints, we have not been able to interrogate every detail in the numerous tables included in the Screening Report.	Resource constraint within RSPB Scotland noted.
		RSPB Scotland would welcome inclusion of consideration of the potential wider ecosystem impacts that may arise through the construction and operation of the wind farm. These could occur, for example, through changes in water column stratification arising from the presence of the wind farm ultimately altering the availability of prey to seabirds.	Pressures screened in have been agreed with NatureScot and do include assessment of prey resources (Section 8.8 of the <b>Offshore RIAA</b> ) and physical processes (Section 8.11 of the <b>Offshore RIAA</b> ).
		If the apparent uncertainty about the number of turbines to be installed is not resolved by the time applications for the development are submitted, RSPB Scotland assumes that any assessments submitted in support of the applications will reference the 'worst case scenario' when it comes to identifying LSE.	As set out in Section 1.10 of the <b>Offshore RIAA</b> , the Project Design Envelope assessed in the <b>Offshore RIAA</b> uses the worst-case scenario.
		It is not clear why, when 24 months monthly surveys have been undertaken, the processed information to inform Screening has been undertaken based on only the first 12 months of DAS data (see paragraph 4.1.3.2 of the Screening Report).	At the time of writing the HRA Screening Report (Spiorad Na Mara Ltd, 2024) only 12 months of DAS had been completed and analysed. 24 months of DAS has been used to inform the <b>EIAR Appendix 14.1, Volume 2c</b> and the updated HRA screening presented in <b>Offshore RIAA Appendix A</b> .
	We note that the presence of very few Great Skua was recorded, however the years surveyed are all years during or just after the main impacts of HPAI on Great Skua, which has seen the UK population fall		

Consultee	Date and Forum	Comment	Applicant's Response
		<p>by 77% , with Western Isle population declining 57%. Furthermore, in the years following HPAI there was very poor breeding success (especially for 2022 and 2023), with birds recorded abandoning territories during the breeding season. These changes in population will influence the surveys counts and any assessment based on those surveys will not properly account for potential future population level responses that will occur during the lifetime of the project. For these reasons we would prefer the screening in of Great Skua and associated protected sites. Referencing Tables 5.5 and 5.6 respectively, RSPB Scotland disagrees with the screening out of Great Skua, European Storm Petrel and Leach's Storm Petrel.</p>	<p>The migratory CRM (<b>Offshore EIAR Appendix 14.4, Volume 2c</b>) concluded less than 1 individual per year for great skua. Therefore, no apportioning to site has been undertaken and no change to the screening conclusions for these species in relation to these impacts. Following consultation with NatureScot, and confirmed in <b>Offshore RIAA Appendix A</b>, European storm petrel and Leach's petrel are now included within the <b>Offshore RIAA</b>. As stated above, great skua is not considered.</p>
		<p>The Applicant has also screened out both European and Leach's Storm Petrel due to low numbers being recorded during surveys. However, as highlighted in Deakin et al. 2022, Digital Aerial Surveys (DAS) are likely to have inherent biases in the counts of these species. The first of these biases is related to the small size and consequent detectability of these species, particularly when on the water surface. Furthermore, both species are active throughout the diel cycle, with different levels of activity depending on location and behaviour. As DAS flights are restricted to the middle of the day the results are potentially biased against birds active on the site during the nighttime or crepuscular hours. The Outer Hebrides has over 95% of the UK population of Leach's Storm Petrel and 6% of the UK population of European Storm Petrel. As such it is unlikely that such</p>	<p>As agreed with NatureScot, assessments have been undertaken for European storm petrel and Leach's petrel, with regards to artificial lighting (see Section 8.8 of the <b>Offshore RIAA</b> ) and migratory CRM (see <b>Offshore EIAR Appendix 14.4, Volume 2c</b>).</p> <p>The migratory CRM (<b>Offshore EIAR Appendix 14.4, Volume 2c</b>) concluded less than 1 individual per year for European storm petrel and Leach's petrel. Therefore, no apportioning to site has been undertaken and no change to the screening conclusions for these species in relation to these impacts.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>small numbers are reflective of the actual numbers utilising the survey area.</p> <p>In table 5.7, Manx Shearwater are listed as being vulnerable to impacts associated with artificial lights. This is correct and welcomed by RSPB Scotland. However European and Leach's Storm Petrel are also vulnerable to this impact and, as noted above, should be screened into this assessment.</p> <p>Further detail is also required as to how this impact will be quantified. All these species can be subject to attraction to light (such as those on turbine nacelles) and subsequent disorientation, (Deakin <i>et al.</i>, 2022) Such attraction, and subsequent disorientation, could have both direct and indirect impacts on these species. Direct impacts would be collision of birds that have altered their flight trajectory to enter the rotor swept zone, and it is most likely best considered by amended collision risk models. Indirect impacts could be through the energetic consequences of additional flight, which could result in subsequent mortality or reduced breeding performance. RSPB Scotland would welcome discussion with the Applicant as to a suitable methodology for this assessment.</p> <p>Noting, and welcoming the screening in of Fulmar in Table 5.5, RSPB Scotland would welcome the inclusion of distributional responses as an impact for Fulmar, in particular in the consideration of in-combination impacts. We acknowledge that this is not something that has usually been considered for this species, mainly due to their large foraging range. However, the scale of proposed development in</p>	<p>As agreed with NatureScot, qualitative assessments have been undertaken for European storm petrel and Leach's petrel, with regards to artificial lighting (see Section 8.10 of the <b>Offshore RIAA</b>).</p> <p>As agreed with NatureScot, fulmar has been assessed for barrier effects (see Section 8.4 of the <b>Offshore RIAA</b>). This qualitative assessment concluded no potential impacts on these species (Section 8.4 of the <b>Offshore RIAA</b>), and therefore has not</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>the ScotWind leasing round may mean that this becomes an emerging issue, and RSPB Scotland would welcome its consideration.</p> <p>RSPB Scotland would welcome the inclusion of distributional responses as an impact for Fulmar, in particular in the consideration of in-combination impacts.</p>	<p>been taken forward to in-combination assessment.</p>
<p>Western Isles District Salmon Fisheries Board</p>	<p>HRA Screening Opinion – Appendix 1</p> <p>October 2024</p>	<p>WIDSFB welcome the inclusion of Atlantic Salmon being scoped into the EIA. WIDSFB understand that the inclusion of Atlantic Salmon is based on a 50km zone of influence however ZSL are conducting tracking studies which could potentially confirm connectivity between the Langavat SAC and the Spiorad na Mara development. If the ZSL tracking study confirms connectivity to the Langavat SAC then the HRA screening should be revisited.</p>	<p>Langavat SAC is screened into the HRA assessment and so has been considered within Section 7 of the <b>Offshore RIAA</b>. Reference is made to the tracking study within the assessment.</p>
		<p>Impacts to migration from reflected light, shadow flicker and fixed electrical lighting should have clear mitigation measures identified in the EIA.</p>	<p>Light has been screened in for migratory fish through the pressure 'physical presence of structures'.</p> <p>Flicker has been screened out following consultation with NatureScot (see response from 21 March 2025 detailed below in this table).</p> <p>Embedded mitigation has been identified as per Section 3.1 of the <b>Offshore RIAA</b> where required, including a Lighting and Marking Plan.</p>
		<p>Mitigation measures identified to address the risk of increased losses resulting from predation of smolts navigating the development site.</p>	<p>Embedded mitigation has been identified as per Section 3.1 of the <b>Offshore RIAA</b> where required.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		Where appropriate the mitigation requests above should consider outgoing (smolt) and returning (adult) life stages of Atlantic Salmon.	Embedded mitigation has been identified as per Section 3.1 of the <b>Offshore RIAA</b> with secondary mitigation referenced in Section 7.2.
Whale and Dolphin Conservation (WDC)	HRA Screening Opinion – Appendix 1	WDC is particularly concerned that not all cetacean species in the area have been screened into the HRA. All cetaceans are protected under UK law... this should be a key consideration (in) the HRA process.	The HRA is focused on designated sites (and the features for which those sites are designated). For cetaceans (Section 5 of the <b>Offshore RIAA</b> ), this is limited to harbour porpoise and bottlenose dolphin. All other cetacean interests, including those within MPAs, are addressed through the EIAR ( <b>Offshore EIAR Chapter 12, Volume 2a</b> ).
	October 2024	<p>The HRA screening report fails to screen-in and adequately address the existence of the North-east Lewis Nature Conservation MPA for Risso's dolphins and sandeels, which is a significant oversight given that this MPA lies within the screening area for the proposed development. It is crucial that the HRA screening report incorporates details and an assessment of this MPA, which was designated by the Scottish Government in 2020.</p> <p>Risso's dolphins are regularly recorded both within and outside the MPA throughout the year, with a minimum population estimate of 117 animals. Many of these dolphins have been re-sighted between and within years and over extended periods (more than 10 years), indicating strong site fidelity and at least partial residency for some individuals. Additionally, mothers with calves and groups consisting entirely of juveniles have also been observed within the NCMPA), highlighting that these waters are vital not only for feeding but also for breeding, nursing, and raising their young.</p>	
		WDC does not agree that the 'Physical presence (of vessels)' during the operational and maintenance phases can be excluded (screened	

Consultee	Date and Forum	Comment	Applicant's Response
		<p>out) for cetacean MPAs. We recommend that this factor is screened in for all cetacean MPAs at all stages of the project phase in the HRA.</p>	<p>of the Offshore RIAA for the description of the pressure and assessment respectively).</p>
		<p>Increased vessel noise can disrupt critical cetacean behaviour and cause displacement. For example, studies have shown that foraging behaviour and echolocation of harbour porpoise can be negatively impacted by the presence of vessels, resulting in significantly fewer prey captures. Given their high metabolism, harbour porpoises need to feed constantly and therefore particularly sensitive to disturbances. Interruptions in foraging can lead to reduced energy intake, with individuals potentially losing 4% of their body weight in just 24 hours due to starvation.</p>	<p>Vessel noise is assessed for marine mammals, including harbour porpoise, under the pressure underwater noise (Section 5.3 of the <b>Offshore RIAA</b>). Physical presence of vessels is also assessed as a pressure (see Section 5.2.5 and Section 5.6 of the <b>Offshore RIAA</b> for the description of the pressure and assessment respectively).</p>
		<p>Species such as sandeels, mackerel, whiting, and sprat are particularly impacted, all of which are key prey species for the harbour porpoise. Any development has the potential to disrupt prey populations and the specific impacts on marine mammals remains uncertain. Therefore, it is essential that these impacts be included within the HRA screening. Additionally, buried cable corridors should ideally be shared between developments to minimise the number of cables required. Cable routes have not yet been defined but evidence indicates that the development and operation of offshore windfarms can adversely impact cetacean prey species. This can result from construction noise, damage to the seabed and electromagnetic fields (EMF) generated by the cable corridors during operation</p>	<p>Indirect effects (impacts on prey), which includes consideration of EMF, have been screened in for all Project phases and are assessed in the <b>Offshore RIAA</b> (see Section 5.2.5 and Section 5.6 of the Offshore RIAA for the description of the pressure and assessment respectively).</p>
		<p>WDC advises against using pile-driven foundations due to the intense impulsive noise pollution they generate, which can have harmful impacts on cetaceans. Although the immediate area of the</p>	<p>While percussive piling is included in the project envelope a detailed assessment of the effects on screened in features has been undertaken</p>

Consultee	Date and Forum	Comment	Applicant's Response
		development is not a designated MPA, a number of cetacean species that depend on the region are sensitive to disturbance from noise generated during pile driving and this is a major concern.	with appropriate mitigation included as required to ensure no adverse effect on integrity on the conservation objectives of screened in sites.
		WDC acknowledges the use of the Lewis Wave array project data. However, since this survey data is now 14 years old, it should only be used in conjunction with more recent surveys that provide appropriate coverage and survey methodology. Hague <i>et al.</i> (2020) provide a useful overview of regional baselines for marine mammals in Scottish waters, and additional data is available from various other organisations including Hebridean Whale and Dolphin Trust (2018) and Whale and Dolphin Conservation (2024).	Noted. Baseline data (including project specific survey data) applied within the <b>Offshore RIAA</b> draws on that presented within wider project reporting, as relevant to the designated site being assessed, as identified in <b>Table 1-2</b> of the <b>Offshore RIAA</b> .
		WDC notes that DAS were undertaken for 2 years, however the methodology for these surveys is unclear, including the frequency of the surveys and the specific protocols used. To provide a reliable baseline, these should be conducted monthly, and ideally multiple times each month, covering both the project area and a buffer zone that represents the impact of range of noise during construction. We are concerned that very few species known to use the area have been documented through the DAS... It is recommended that additional data is utilised to provide a more accurate baseline.	Further details of the methodology for baseline data gathering is addressed in Section 13.5 of <b>Offshore EIAR Chapter 13, Volume 2a</b>  In addition to the site-specific data that have been collected through 24 months of DAS surveys, a 12- month campaign of static Passive Acoustic Monitoring (PAM) was undertaken.
		WDC acknowledge that mitigation measures will be detailed in Stage 2 of the of the HRA Screening Assessment. We have previously raised concerns regarding mitigation methods, including soft starts, acoustic deterrents and marine mammals observers, for minimising the risk of injury to marine mammals from noise pollution, particularly piling	Embedded mitigation has been identified as per Section 3.1 of the <b>Offshore RIAA</b> where required.

Consultee	Date and Forum	Comment	Applicant's Response
		<p>noise. The effectiveness of these methods are increasingly being criticised and lack supporting evidence.</p> <p>WDC recommend that mitigation methods proven to reduce noise levels should be prioritised. Studies at full scale offshore wind farms have shown that the use of bubble curtains during pile driving activities can reduce the sound propagation and thus the area which harbour porpoises are disturbed... Reducing levels of noise propagating into the marine environment should be prioritised in order to minimise the displacement and disturbance of cetaceans over significant distances.</p>	<p>Embedded mitigation has been identified as per Section 3.1 where required. That includes a commitment to noise abatement.</p> <p>Consideration of the effects of underwater noise considered in <b>Offshore EIAR Chapter 13, Volume 2a</b>, assessed in Section 5.3 of the <b>Offshore RIAA</b>.</p>
MD-LOT	<p>HRA Screening Opinion</p> <p>October 2024</p>	<p><b>Benthic Subtidal and Intertidal Ecology</b></p> <p>MD-LOT acknowledges the precautionary approach of basing the assessment for benthic features on a 15 km Zone of Influence ("Zol"). Once Project specific reporting is available, MD-LOT advises reviewing and, if necessary, revising the Zol. MD-LOT advises that, in line with the NatureScot representation, the Tràigh na Berie SAC should be screened in as it lies within the Zol.</p> <p>With regard to the identification of European sites and features, MD-LOT is broadly content with the sites and features identified in Table 5-1 of the HRA Screening Report.</p>	<p>Noted and agreed that the 15 km Zol applied for benthic habitats has been revisited, with <b>Offshore EIAR Chapter 9: Physical Processes, Volume 2a</b> confirming a tidal excursion ellipse equivalent to approximately 6 km from the Array Area. The 15 km applied in screening is therefore highly precautionary.</p> <p>The Tràigh na Berie SAC has been screened in for the same pressures as the Loch Roag Lagoons SAC (see <b>Offshore RIAA Appendix A</b>).</p> <p>Agreement on screening conclusions presented noted.</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>MD-LOT is content with the conclusions presented in section 4.1.1.1 of the HRA Screening Report to screen out St Kilda Special Area of Conservation ("SAC") and North Rona SAC. This is in line with the NatureScot representation.</p>	
		<p><b>Otter</b></p> <p>In line with NatureScot advice, MD-LOT advises the Developer to consider impacts to otters in the marine environment within 10 km of the Proposed Development.</p>	<p>Otter was screened in onshore for the Lewis Pentland SAC within the Screening Report being commented on. In response to this comment, otter from the Lewis Pentland SAC is also screened into the <b>Offshore RIAA</b> by applying the same pressures already identified onshore and intertidally (see Section 6 of the <b>Offshore RIAA</b>).</p>
		<p>With regards to the identification of European sites designated for marine mammal qualifying interests in Scottish waters, MD-LOT agrees with the NatureScot representation regarding seals and the selection of receptors. Consequently, MD-LOT is broadly content with the conclusions in Table 5-2 of the HRA Screening Report. However, while MD-LOT notes that otter is discussed as a qualifying interest of the Lewis Peatlands SAC in the Terrestrial chapter of the HRA Screening Report, this is not the case for the offshore environment.</p>	<p>No change to the Applicant's response required. Potential impact on otter in the marine environment as it relates to the Lewis Pentland SAC screened in.</p>
		<p><b>Marine Mammals</b></p>	
		<p>MD-LOT advises the Developer to include all impacts that could affect marine mammals in the Report to Inform Appropriate Assessment ("RIAA"). This includes, but may not be limited to, disturbance from</p>	<p>Pressures screened in now include indirect effects (on prey) for marine mammals during all Project phases (incorporating EMF). Section 5.2</p>

Consultee	Date and Forum	Comment	Applicant's Response
		noise, physical structures, vessel presence, seabed damage and electromagnetic fields. This is supported by the NatureScot and WDC representations. Furthermore, different sources of impacts should be considered separately from one another, as detailed in the NatureScot advice on Table 7-2 of the HRA Screening Report.	of the <b>Offshore RIAA</b> provides clarity on the different sources of impact, including with respect to underwater noise.
		Given the concerns raised by the WDC about the methodology for digital aerial surveys ("DAS") and the data subsequently obtained, described in Section 4.1.2.9 of the HRA Screening Report, MD-LOT advises that the Developer considers the WDC representation regarding collection of additional DAS data.	Please see the response to WDC comments October 2024 above.
		MD-LOT advises that the Developer considers mitigation methods that are proven to reduce noise levels e.g. bubble curtains. This is supported by the WDC representation.	Please see the response to WDC comments October 2024 above.
		MD-LOT also notes the Developer's use of the Lewis Wave Array data on marine mammals, as described in Section 4.1.2.4 of the HRA Screening Report. MD-LOT advises that the additional data sources suggested by the WDC are used in conjunction with the Lewis Wave Array data in order to provide support for this older data source.	The data sources suggested by the WDC have been used in conjunction with the Lewis Wave Array data. See <b>Table 13-3 in Offshore EIAR Chapter 13: Marine Mammals, Volume 2a</b> , sets out the Applicants response and identifies where each Scoping Opinion comment has been addressed within the EIAR. <b>Table 13-8 in Offshore EIAR Chapter 13: Marine Mammals, Volume 2a</b> provides details of the data sources used to inform the Marine Mammal EIA.
		<p><b>Ornithology</b></p> <p>With regards to the identification of European sites designated for offshore and intertidal ornithology in Scottish waters, MD-LOT is</p>	The Physical Presence (distributional effects) pressure includes visual disturbance from vessel

Consultee	Date and Forum	Comment	Applicant's Response
		<p>broadly content with the conclusions of the HRA Screening Report. However, MD-LOT highlights the NatureScot representation regarding the impact pathways caused by vessels, and advises these should be expanded to include visual disturbance from vessels, movement of vessels between the Proposed Development area and ports and temporary impacts to prey availability, during construction and decommissioning, in the RIAA.</p>	<p>movements, and this is considered in Sections 8.3 and 8.5 of the <b>Offshore RIAA</b>.</p> <p>Indirect effects on prey are screened in as included in <b>Offshore RIAA Appendix A</b> and has been assessed in the <b>Offshore RIAA</b> (Section 8.8). Due to the predicted impact from the Offshore Project and the predicted Zol of the effect, no other projects could have an in-combination effect on the same prey resource, therefore no in-combination assessment was undertaken.</p>
		<p>MD-LOT advises the Developer to screen in impacts to key prey species, prey habitats, and prey availability from the Proposed Development itself, both alone and in combination with other Developments, for all phases of the Proposed Development's lifespan. This is supported by the NatureScot representation.</p>	<p>All pressures screened in are confirmed in <b>Offshore RIAA Appendix A</b> and assessed within the Sections 8 (Offshore Project alone assessment) and 13 (Offshore Project in-combination assessment of the <b>Offshore RIAA</b>,</p>
		<p>MD-LOT also notes the RSPB representation that, during the construction and operation of the Proposed Development, there is the potential for wider ecosystem impacts. These impacts should be considered by the Developer in the RIAA.</p>	<p>In line with NatureScot guidance and advice, Woodward <i>et al.</i> (2019) foraging ranges have been applied, measuring the at sea edge to edge distance between SPAs and the Offshore Project Boundary.</p> <p>Based on this approach the St Kilda SPA has been included in the <b>Offshore RIAA</b> for kittiwake, razorbill, puffin and gannet, and the</p>
		<p>MD-LOT highlights the National Trust for Scotland representation, which does not support the screening out of the following qualifying interests at the following designated sites; Leach's petrel at St. Kilda Special Protection Area ("SPA"), fulmar at Seas off St. Kilda SPA and both fulmar and guillemot at the Mingulay and Berneray SPA. MD-LOT also highlights the NatureScot representation, which states that Seas off Foula SPA should be included in the SPA longlist on the basis</p>	

Consultee	Date and Forum	Comment	Applicant's Response
		<p>of connectivity with breeding seabirds. MD-LOT advise the Developer should include these in the RIAA.</p>	<p>Mingulay and Berneray SPA has been included in the <b>Offshore RIAA</b> for kittiwake, razorbill and puffin. Guillemot has not been included for the Mingulay and Berneray SPA due to the SPA being 181 km from the Offshore Project Boundary and therefore over the foraging range of guillemot (95.2 km: MM +1SD excluding data from Fair Isle).</p> <p>Leach's petrel has been assessed for potential adverse effects from artificial lighting (Section 8.10).</p> <p>As agreed with NatureScot, Fulmar has been assessed for barrier effects in Section 8.4 of the <b>Offshore RIAA</b>.</p>
		<p>Table 5-4 and Section 7.4 of the HRA Screening Report lists species which qualify as a named component of breeding bird assemblages. MD-LOT agrees with the NatureScot representation that these species should be treated the same as a qualifying interest and, consequently, Table 5-4 should be reviewed.</p>	<p>As set out in Section 8.3.1 of the <b>Offshore RIAA</b>, named components of an assemblage have been treated as qualifying features. However, where a species exists only as an assemblage feature, then the assessment has considered whether an adverse effect on the conservation objectives of the assemblage as a whole can be ruled out, when taking into account the relevant named components.</p>
		<p>MD-LOT highlights the NatureScot representation about the unsuitability of apportioning at stage 3 HRA. Instead, the Developer should use distances from the edge of the Proposed Development</p>	<p>In line with NatureScot guidance and advice, Woodward <i>et al.</i> (2019) foraging ranges have been applied within <b>Offshore RIAA Appendix</b></p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>area to the edge of SPAs to establish connectivity, or lack thereof, in the RIAA.</p>	<p><b>A</b>, measuring the at sea edge to edge distance between SPAs and the Offshore Project Boundary. For guillemot and razorbill, all designated sites south of the Pentland Firth (i.e., excluding the Northern Isles) use the MM foraging range +1 SD discounting Fair Isle values.</p>
		<p>MD-LOT agrees with the NatureScot representation that HRA Screening conclusions based on DAS should be based on two years of data. The HRA Screening Report is based on one year of data for breeding seabirds in the breeding season. Therefore, the Developer should not screen out petrel species or great skua based on low DAS count numbers. This includes Leach's petrel, which is within connectivity distance for several SPAs. This is also supported by the RSPB representation. MD-LOT notes the RSPB representation calling for these assessments to be quantitative. However, given the challenges of undertaking quantitative assessments for petrels, MD-LOT is content for the Developer to assess these species qualitatively, per the NatureScot representation.</p>	<p>At the time of writing the HRA Screening Report (Spiorad Na Mara Ltd, 2024) only 12 months of DAS had been completed and analysed. 24 months of DAS has been used to inform the <b>Offshore RIAA</b> and the updated HRA screening (see <b>Offshore RIAA Appendix A</b>). Great skua have been scoped out as a VOR based on 24 months of data (<b>Offshore EIAR Appendix 14.1, Volume 2c</b>), but has been assessed for migratory CRM (see <b>Offshore EIAR Appendix 14.4, Volume 2c</b>), The migratory CRM (<b>Offshore EIAR Appendix 14.4, Volume 2c</b>) concluded less than 1 individual per year for great skua. Therefore, no apportioning to site has been undertaken and no change to the screening conclusions for these species in relation to these impacts.</p>

Consultee	Date and Forum	Comment	Applicant's Response
			Leach's petrel has been assessed for potential adverse effects from artificial lighting (Section 8.10 of the <b>Offshore RIAA</b> ).
		For European and Leach's storm petrel, the Developer should screen in the impact of artificial lighting associated with the Proposed Development. The RIAA should also include greater detail on how this impact pathway will be assessed. This is supported by the RSPB representation.	As agreed with NatureScot, the assessment of artificial lighting on European storm petrel and Leach's petrel has been undertaken qualitatively (see Section 8.10 of the <b>Offshore RIAA</b> ).
		MD-LOT agrees with the Developer's decision to screen in fulmar in Table 5-5 of the HRA Screening Report. The Developer is encouraged to assess distributional responses for fulmar in the RIAA. This is supported by the RSPB representation.	As agreed with NatureScot, Fulmar has been assessed for barrier effects in Section 8.4 of the <b>Offshore RIAA</b> .
		MD-LOT is broadly content with the Developer's approach to assessing vulnerability of species within connectivity distance. However, the Developer should make it clear in the RIAA precisely where these scores come from. This is supported by the NatureScot representation.	Vulnerability is applied before the assessment stage and is used to help determine screening conclusions and to identify species for inclusion in CRM and distributional response. Agreement with NatureScot on which species to consider for which impact within the <b>Offshore EIAR</b> and <b>Offshore RIAA</b> has been reached.
		Should it be available at time of assessment, the Scottish Ministers advise the use of the CEF in undertaking the cumulative assessment."  "In relation to the inclusion of Berwick Bank in the cumulative impact assessment, as this project is yet to be determined, the Scottish Ministers advise that PVA models should be run using two scenarios, Berwick Bank consented and unconsented."	At time of drafting the <b>Offshore RIAA</b> , the CEF was not available.  In-combination assessments (including PVAs) has been run considering scenarios with Berwick Bank, and without Berwick Bank.

Consultee	Date and Forum	Comment	Applicant's Response
		<p>"The Scottish Ministers are unable to provide further specific advice due to the lack of detail in the Scoping Report in relation to the cumulative assessment of the impact to ornithological receptors."</p>	
		<p>"The Scottish Ministers support the intention to follow NatureScot guidance with respect to apportioning impacts, however, refer the Developer to the NatureScot representation in this regard and advise that this is addressed in the EIA Report."</p>	<p>The confirmed comment from the Scottish Ministers is noted. In line with NatureScot's representation, the theoretical approach to apportionment has been used (see <b>Offshore RIAA Appendix D</b> for further details).</p>
		<p><b>Migratory Fish and FWPM</b></p>	
		<p>MD-LOT notes varying distances from each Atlantic Salmon SAC are presented in Table 5-14 of the HRA Screening Report and requests clarification on the meaning of distances marked as "at Sea".</p>	<p>Effectively, these 'at sea' distances allow for land. In instances where a distance between Offshore Project Boundary and SAC drawn in a straight line would cross land, but the receptor clearly would not (as is the case for fish) then GIS has been used to record the shortest distance by sea. The approach has not altered the screening conclusions (i.e. if a straight line were applied, the SACs screened in would remain the same).</p>
		<p>Section 4.1.4.4 of the HRA Screening Report notes that Atlantic Salmon tracking studies are currently being conducted. Should connectivity be established between the Langavat SAC and the area of the Proposed Development, MD-LOT advises the Zol presented for Atlantic Salmon is reviewed and taken forward in the RIAA. This is in line with the Western Isles DSFB representation.</p>	<p>We can confirm that Langavat SAC has been screened in for Atlantic Salmon (See <b>Offshore RIAA Table 7-2</b>).</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>Section 3.2.4.9 of the HRA Screening Report states that tracking data from the tagging of salmon smolts could not establish connectivity to the south west of Scotland, north west of England or Northern Ireland. MD-LOT, in line with the Fisheries Management Scotland representation, notes that lack of evidence does not mean there are no impacts to diadromous fish. The Developer should determine whether there is wider connectivity to other SACs. If it cannot be proven there is no wider connectivity for an SAC, then the SAC should be included in the RIAA.</p>	<p>The screening approach applied has been confirmed by NatureScot in their response, specifically <i>'We agree with the conclusion to screen in North Harris and Langavat SACs. For FWPM in North Harris SAC, sea trout will also be a host – so like Atlantic salmon, anything which has the potential to impact Atlantic salmon/sea trout populations has the potential to impact FWPM. We suggest that, whilst it is unlikely that the development will impact the freshwater habitats that support either salmonid species or FWPM, it may have the potential to impact either of the salmonid species which are essential for FWPM to complete its life cycle. In our response to MD-LOT we stated that the River Derwent SAC and Atlantic salmon originating from rivers in other parts of Great Britain and Ireland may be come into contact with the proposed development (e.g. Lilly, 2023; Rogers et al., 2024). However, we are aware evidence is currently a bit patchy. We therefore agree with the conclusion to screen out the River Derwent. However, this river as well as other natal rivers for Atlantic salmon should still be considered as part of the EIAR (<b>Offshore Chapter 12 Volume 2a</b>). In addition, the Applicants may wish to be</i></p>

Consultee	Date and Forum	Comment	Applicant's Response
			<p><i>involved in more strategic salmonid tracking studies on the west coast.'</i></p> <p>Therefore, the screening conclusion remains with two SACs screened in for salmon. Salmon are further considered in the EIAR (<b>Offshore EIAR Chapter 12 Volume 2a</b>) and <b>Offshore RIAA</b> Section 7.</p>
		<p>MD-LOT agrees with the sites screened in. MD-LOT is content with the River Derwent SAC being screened out however advises this site should still be considered as part of the EIA.</p>	<p>Noted (See <b>Offshore EIAR Chapter 12, Volume 2a</b>).</p>
		<p>In relation to the pressures screened in for the North Harris SAC, MD-LOT advises impacts from the development on the freshwater habitats should be considered, as well as how these impact Atlantic salmon and sea trout populations and, subsequently, the freshwater pearl mussel feature of the site. This is in line with the NatureScot representation.</p>	<p>Noted. This comment relates to terrestrial elements of the Project and will be considered as part of the OTW Project".</p>
		<p>MD-LOT advises there is a risk of Invasive Non-Native Species (INNS) during both the construction and decommissioning activities, and INNS should therefore be screened in for these phases of the Proposed Development.</p>	<p>INNS have been screened in for migratory fish in the construction and decommissioning phase as well as for operation (see <b>Offshore RIAA</b> Section 7.2.11 and 7.2.12).</p>
		<p>MD-LOT is unclear if increased risk of predation is considered within the HRA Screening Report. As a key pressure in relation to migratory fish and freshwater pear mussel, MD LOT requests this is considered in the RIAA.</p>	<p>Pressures screened in for migratory fish have been amended to explicitly include increased risk of predation (operation only - please note this has been included under physical presence</p>

Consultee	Date and Forum	Comment	Applicant's Response
		MD-LOT advises that the representation by the Western Isles DSFB on mitigation measures is fully considered and taken forward in the RIAA.	of structures) (See <b>Offshore RIAA Appendix A</b> and <b>Offshore RIAA</b> Section 7) Embedded mitigation has been identified as per Section 3.1 of the <b>Offshore RIAA</b> where required.
RSPB Scotland	Consultation call with RSPB  20 November 2024	The fourth census of Britain and Ireland's internationally important populations of breeding was published in November 2023. We recommend this is used as the most up-to-date record of seabird numbers.  We also encourage discussion with local ornithology groups as there are anecdotal reports of thousands of sooty (and other) shearwater being present around the West Coast of Lewis in certain weather conditions.	Seabird populations used within Section 8 of the <b>Offshore RIAA</b> have been based on the Seabirds Count census (Burnell, 2023).  RSPB Scotland's comment is noted, and we can confirm that consultation has taken place with local ornithology groups. Anecdotal evidence was provided to the Applicant from local groups on Lewis (via RSPB Outer Hebrides on 09 September 2025) and has been taken into consideration in the assessment. The Applicant responded to RSPB Outer Hebrides on 06 February 2026 confirming that the number of birds observed have been accounted for within the mCRM ( <b>Offshore EIAR Appendix 14.4, Volume 2c</b> ) and that these numbers are known to exist within this area, as described within <b>Offshore EIAR Appendix 14.1, Volume 2c</b> .

Consultee	Date and Forum	Comment	Applicant's Response
		<p>We welcome using foraging ranges as published in Woodward <i>et al.</i> (2019) to derive connectivity with SPA colonies. We also recommend that site specific data are examined and where the maximum foraging range from the colony exceeds the generic value, that the site-specific value is used.</p> <p>The exceptions to this are for common guillemot and razorbill. Tracking on Fair Isle showed foraging for both common guillemot and razorbill distances are greater than those of all other colonies. This may relate to poor prey availability during the study. However, trends for seabirds in the Northern Isles indicate this may be becoming a more frequent occurrence. For all designated sites south of the Pentland Firth (i.e. excluding the Northern Isles), we advise use of mean max (MM) plus one standard deviation (SD) discounting Fair Isle values.</p>	<p>In line with NatureScot guidance and advice, Woodward <i>et al.</i> (2019) foraging ranges have been applied, measuring the at sea edge to edge distance between SPAs and the Offshore Project Boundary.</p> <p>For guillemot and razorbill, all designated sites south of the Pentland Firth (i.e., excluding the Northern Isles) use the MM foraging range +1 SD discounting Fair Isle values.</p>
		<p>For the list of migratory birds in section 6.7.3.8, we consider there are a number of species missing that are reported around West Coast of Lewis. This includes Sooty Shearwater, Long-tailed skua and Pomarine Skua which in suitable weather conditions are reported to number into the thousands. We also recommend bar-tailed godwits and grey phalarope are included in the list of birds for consideration.</p>	<p>This has been discussed with NatureScot and it has been agreed that an assessment of all of these species, as migratory species should be undertaken. The conclusions on collision risk to migratory birds are presented in Section 8.6 of the <b>Offshore RIAA</b>.</p>
		<p>If the proposed turbines are within a migration route, we suggest an appropriate mitigation measure may be to curtail turbine rotation speed at appropriate times of year to reduce collision risk. This is the approach taken for Dutch North Sea wind turbines during bird migration.</p>	<p>The comment from the RSPB is noted. The conclusions on collision risk to migratory birds are presented in Section 8.6 of the <b>Offshore RIAA</b>. It was determined that for all migratory species at all SPAs and Ramsar sites assessed, the decrease in survival rate is less than 0.02</p>

Consultee	Date and Forum	Comment	Applicant's Response
			percentage points, and therefore well below the level at which there could be any material effect on the population. Therefore, mitigation measures with regards to migratory birds are not required.
		We broadly agree with the scoping in and out of the primary impact pathways but consider more thought should be given to secondary and cumulative impact pathways. For example, ocean stratification should be considered in the context of offshore wind development and the effects of this on prey availability and seabird foraging areas scoped in.	Stratification is considered within <b>EIAR Chapter 9, Volume 2a</b> . That concluded 'no significant changes to seasonal or spatial stratification patterns are predicted', that the magnitude of impact would be negligible being of immediate spatial extent, with a short term and temporary timescale and smaller than natural variability. Therefore this has not been included within the assessment of marine and nearshore ornithological features within Section 8 of the <b>Offshore RIAA</b> .
		RSPB Scotland has outstanding issues with the manner in which the bio-seasons definitions from Furness (2015) have been defined for gannet and kittiwake.	As set out in the <b>Offshore EIAR Appendix 14.1, Volume 2c</b> , the seasons applied in Section 8 of the <b>Offshore RIAA</b> follow NatureScot (2020) guidance and Furness (2015). For kittiwake this gives a breeding season of mid-April-August, and for gannet this gives a breeding season of March-September.
		We agree with NatureScot (2023) guidance for running CRM. Running CRM with Option 3 provides valuable context, but our decision around significance of impacts will be based on option 2. Similarly	As set out in <b>Offshore EIAR Appendix 14.3, Volume 2c</b> , CRM was based on the Option 2 Band (2012) Model, as per NatureScot

Consultee	Date and Forum	Comment	Applicant's Response
		<p>running the models deterministically adds context particularly when looking comparatively at older developments.</p>	<p>guidance. Within <b>Offshore EIAR Appendix 14.3, Volume 2c</b>, there are also deterministic results presented. However, only stochastic model results have been used within Section 8.6 of the <b>Offshore RIAA</b>.</p>
		<p>Although macro-avoidance is not mentioned in the EIA report, we wish to highlight that there is currently no agreed mechanism to combine collision and distributional change modelling, although a framework had been created.</p>	<p>The implications of the way collision and displacement are combined have been set out in Section 8.7 of the <b>Offshore RIAA</b>. The two impacts have been assessed additively, in line with NatureScot guidance.</p>
		<p>We agree with NatureScot that the NE approach of applying a macro-avoidance rate to gannet density prior to calculating collision risk is inappropriate for breeding birds.</p>	<p>The comment from the RSPB Scotland is noted. A macro avoidance rate has not been applied for gannet during the breeding season.</p>
		<p>Whilst the RSPB agree with the majority of the NatureScot advised Avoidance Rates including the use of a 99.2% avoidance rate for non-breeding gannets, in our opinion, a 98% avoidance rate is more appropriate for breeding gannets.</p>	<p>The comment from the RSPB Scotland is noted. However, as required by the Scottish Ministers, the Applicant has carried out CRM using the avoidance rates advised by NatureScot (NatureScot, 2025) and presented in <b>Offshore EIAR Appendix 14.3, Volume 2c</b>.</p>
		<p>For gannet displacement analysis, an availability bias should also be applied to input densities, following the same logic as for other diving species. (N.B. This is not necessary for densities used in collision risk models as only birds in flight are considered).</p>	<p>The comment from the RSPB Scotland is noted. The Applicant has carried out distributional response analysis applying the parameters advised by NatureScot. See <b>Offshore EIAR Appendix 14.2, Volume 2c</b> for the full methodology.</p>

Consultee	Date and Forum	Comment	Applicant's Response
RSPB Scotland	RSPB Introductory Meeting	The RSPB would like to see the 98% avoidance rates alongside the 99.2% NatureScot avoidance rate guidance. They note that data is being gathered at the Flamborough and Filey Coast SPA to inform RSPB's position. (Page 5)	The comment from the RSPB Scotland is noted. However, as required by the Scottish Ministers, the Applicant has carried out CRM using the avoidance rates advised by NatureScot (NatureScot, 2025).
	21 November 2024	RSPB welcome the increase in minimum tip blade clearance up to 30 m.	The comment from the RSPB Scotland is noted.
<b>Ad-hoc Consultation</b>			
NatureScot	Feedback on Proposed Approach to Offshore Ornithology Impact Assessment 25 April 2024	<p>The document states that the SeabORD tool is not accessible at the moment, and its integrating timeline in the Cumulative Effects Framework (CEF) remains unknown. We advise that you direct any queries on the availability of both SeabORD and CEF to Marine Directorate. Our understanding is that there is a version of SeabORD available but this should be clarified with MD LOT.</p> <p>NatureScot intends to update our displacement guidance, based around recent post-consent monitoring, and we hope that this will be available later in 2024.</p> <p>The latest version of SeabORD should be available when the CEF is published, and should be used if available within Spiorad na Mara's timelines. We will update our position once the CEF is available. In the absence of the CEF it is acceptable to use the current version of SeabORD with the distance decay method.</p>	<p>The SeabORD tool has been used in the displacement assessment, as set out in the <b>Offshore EIAR Appendix 14.2, Annex 14.2.2: SeabORD Report, Volume 2c</b>.</p> <p>The results of SeabORD tool are presented within Section 8.3 of the <b>Offshore RIAA</b>, where appropriate.</p>
		<p>The document states an intention to use SOSS-MAT for the assessment of migratory birds. Please note, we do not support an assessment of migratory birds based on SOSS-MAT due to more</p>	<p>The advice provided by NatureScot is noted and agreed. Further details on the assessment of collision risk on migratory birds are provided in <b>Offshore EIAR Appendix 14.3, Volume 2c</b>. The</p>

Consultee	Date and Forum	Comment	Applicant's Response
		<p>recent work which reflects the Scottish specific context. This reiterates the advice we have provided as part of scoping: We do not support the proposed use of Wright <i>et al.</i>, 2012 (aka SOSS-MAT) to assess barrier effects to migratory birds, and we advise that this source has been superseded. The recently published Offshore wind – birds on migration in Scottish waters: strategic review (2023) should be used for assessment of migratory birds.</p>	<p>apportioning for which migratory non-seabirds are assessed within the <b>Offshore RIAA</b> is within <b>Offshore RIAA Appendix D</b>, and the assessment is in Section 8.6 of the <b>Offshore RIAA</b>.</p>
		<p>The document states that the proposed approach [to apportioning] will follow our Guidance Notes 3 &amp; 4. We support this intention. Regarding the apportioning tool (Butler <i>et al.</i>, 2020) - we agree that until the Butler Tool is updated as part of the CEF, to enable Seabird Counts data to be used, the tool cannot be used. We suggest at present that theoretical apportioning should be applied to all colonies under consideration, and then the apportioning that is allocated to sites with sufficient tagging data may be re-apportioned depending on the results of the tracking analysis. Our apportioning Guidance Note is currently being updated and a revised version will be available in due course, but we are unable to provide a timescale at present.</p>	<p>The comment from the NatureScot is noted. The theoretical approach to apportionment has been used to inform the <b>Offshore RIAA</b>. The apportioning calculations are presented in <b>Offshore RIAA Appendix D</b>. The methods used are in line with NatureScot's guidance at the time of application.</p>

Consultee	Date and Forum	Comment	Applicant's Response
NatureScot	NatureScot Update – Ornithology and Marine Mammals By email 13 June 2024	Further to our advice in Guidance Note 11 on requirements for PVA, we have accepted that PVAs will be required for all sites and species where the combined breeding and non-breeding season threshold of 0.02 percentage point change for adult annual survival rate was met or exceeded for Project alone or in-combination impacts.	The threshold for PVA is noted and applied throughout Section 8 and 13 of the <b>Offshore RIAA</b> as relevant.
		To provide a pragmatic and proportionate approach, we advise a PVA of the in-combination effect is not required where the project alone impact is less than 0.2 birds per annum. In this instance a table should be provided that details by site and species what the point change in adult survival rate are and number of birds impacted per annum. We will follow up in writing on this, and can discuss further as required.	This advice is noted and applied to the in-combination assessment (Section 13 of the <b>Offshore RIAA</b> ).

		<p>Marine mammals: at application stage much of the assessment will focus on impacts to cetaceans in the context of EIA. However, there is also a need to consider impacts in the context of EPS, as far as is reasonably practicable. We don't expect a full EPS Risk Assessment, but we are looking to understand what the implications might be for cetaceans under inshore and offshore regulations, and how the risk can be mitigated. We are happy to discuss this further, separately.</p>	<p>European Protected Species (EPS) have been identified in <b>Offshore EIAR Chapter 13, Volume 2a</b> and the outline <b>Marine Mammal Mitigation Protocol (MMMP), Volume 3</b>. The Project acknowledges that it is responsible for assessing the implications to EPS and will provide supporting information to NatureScot and MD-LOT in order to facilitate their decision making should an EPS disturbance licence be required.</p>
NatureScot	<p>Ornithology and Marine Mammal update By email 10 September 2024</p>	<p>Following publication of new avoidance rates in the Oszanlav-Harris <i>et al</i> (2023) paper, the SNCBs have now published joint advice on bird collision risk modelling for offshore wind developments. This can be found here: <a href="https://jncc.gov.uk/news/new-collision-risk-modelling-guidance/">https://jncc.gov.uk/news/new-collision-risk-modelling-guidance/</a>. The note contains the avoidance rates and other parameters we expect to be used. We are working to update our own NatureScot Guidance note on CRM to reflect this.</p> <p>Marine Mammals: We are aware that NMFS are in the process of updating their 2018 Revised Technical Guidance which relates to the criteria for the onset of auditory injury and TTS. The consultation period for this has closed however we are waiting for publication of the updated guidance before we can consider what this means for underwater noise impact assessments in Scottish waters. In the meantime, please continue to use the 2018 guidance. Spiorad na Mara asked for an update on timescales for this and received the following; I've checked and NMFS themselves do not seem to have a timetable for publishing this update, although they are referring to it</p>	<p>New avoidance rates applied in <b>Offshore EIAR Appendix 14.3, Volume 2c</b> and Section 8.6 of the <b>Offshore RIAA</b>.</p> <p>Since receipt of this communication, the new NMFS criteria have been published (in 2024). However, as confirmed with NatureScot via the Scoping Opinion in May 2024, the Southall et al. 2019 thresholds, as the most up-to-date at that time, were approved for use in the assessment of PTS and TTS on marine mammals. This approach was reconfirmed with NatureScot in early 2025.</p>

		as 2024 guidance, so hopefully before the end of this year. <a href="https://www.fisheries.noaa.gov/national/marine-mammal-protection/marine-mammal-acoustic-technical-guidance">https://www.fisheries.noaa.gov/national/marine-mammal-protection/marine-mammal-acoustic-technical-guidance</a>	
NatureScot	Post scoping advice, received via email, 21 March 2025 (advice relevant to the Offshore RIAA included here, note that some advice is EIA only with that considered in <b>EIAR Appendix 5.4 Stakeholder Consultation and Engagement</b> )	We agree with the use of Popper et al (2014) for assessing the impacts of underwater noise on migratory fish.	Popper <i>et al.</i> (2014) applied to the assessment where appropriate (see <b>Offshore RIAA</b> Section 7).
		To confirm, we advise that the effects of seabed vibration are scoped in for migratory fish species, but that it can be scoped out for other benthic and demersal species. We are satisfied that any assessment of impacts of underwater noise on shellfish and benthic receptors is qualitative for the reasons you have given.	Noted. Seabed vibration is described in Section 7.2.2 and then assessed in Section 7.3 of the <b>Offshore RIAA</b> .
		With regards to assessing impacts on blue carbon, you will be aware from our meeting last week that, although it is something we hope to develop, we do not currently have formal guidance on this topic. We recommend that you review recent offshore wind farm consultation responses from NatureScot which are in the public domain, and suggest our responses to the Ossian and Muir Mhòr applications. We may be able to offer comments on any draft Blue Carbon assessment/ outline proposal if it is submitted to us ahead of your application submission.	Further consultation was undertaken with NatureScot to agree the approach for assessing potential impacts on Blue Carbon, via email (12 February 2025).  NatureScot confirmed that there is currently no formal guidance on this topic and advised drawing on recent NatureScot consultation responses for offshore wind farms as a reference point. They also indicated that they would be willing to review and comment on any draft Blue Carbon assessment or outline proposal submitted ahead of the application (21 March 2025).

	<b>t, Volume 1b.</b>		Impacts of the Offshore Project on blue carbon stored within coastal vegetated habitats and other biota are assessed within <b>Offshore EIAR Chapter 11, Volume 2a</b> and <b>Offshore EIAR Chapter 10, Volume 2a</b> in terms of blue carbon resource held in sediments.
		Following some initial interim underwater noise modelling it has been identified that there is potential for impacts on salmon migrating from Loch Roag during construction activities. A full UWN modelling study is due to be undertaken to determine extent of this impact. The Applicant responded via email to say 'SnM would like to discuss our proposed approach to UWN assessment and mitigation including reconfirming proposed noise thresholds that should be adopted with regards to this receptor group. We would also like to finalise the SAC sites that we should screen in for salmon in relation to the project' NatureScot position in email 'Underwater noise thresholds for diadromous fish - for injury - Popper et al (2014) should be used as the basis for a quantitative assessment - for disturbance - there are no thresholds set for behavioural responses, so a qualitative assessment is more appropriate. We advise that only the two local SACs - Langavat SAC and North Harris SAC - should be scoped into HRA for Atlantic salmon.	Noted. A qualitative assessment for behavioural response has been carried out (see Section 7.3 of the <b>Offshore RIAA</b> ) and the named SACs have been screened in (see <b>RIAA Appendix A</b> ).
		We accept this approach of using at-sea distances (as well as direct distances) to support screening decisions.	Noted At sea distances remain applied.
		We have considered the available evidence and now advise that shadow flicker can be scoped out of this assessment.	Noted. Shadow flicker has been screened out from the assessment.
NatureScot	Comments on Digital	NatureScot advise that they would typically expect to see herring gull in the collision assessment.	Herring gull has been included in CRM (see <b>Offshore EIAR Appendix 14.3, Volume 2c</b> ).

<p>Aerial Survey (DAS) Year 2 final report By email</p> <p>03 April 2025</p>	<p>The Applicant confirmed they are carrying out a review of literature regarding impacts of lighting on light sensitive species, which will inform the assessment. NatureScot confirms any conclusions or approaches can be shared and discussed with them.</p>	<p>The review of response to artificial lighting is presented in Section 8.10 of the <b>Offshore RIAA</b>. Additional consultation in which species to include within the response to artificial light assessment is detailed within this consultation table, with petrel and shearwater species requested (see consultation for meeting 16 April 2025).</p>
	<p>In our advice on the Year 1 Report, we advised that we have accepted Berwick Bank wind farm's definition of seasons (Berwick Bank EIA Appendix 11.5), which defines breeding and non-breeding seasons following both NatureScot guidance and BDMPS seasons (Furness, 2015). We are pleased to see the Year 2 Final Report has followed this approach and presented seasonality more effectively in this report.</p>	<p>Agreement noted.</p>
	<p>Consideration should be given to sources of information regarding the distribution of these [Manx shearwaters and storm petrels] species at sea as a general guide to their presence considering DAS may not be effective at detection of nocturnal species, such as Stone <i>et al.</i> (1995) and Waggitt <i>et al.</i> (2019).</p>	<p>As agreed with NatureScot, these species have been considered in the mCRM assessment (<b>Offshore EIAR Appendix 14.4, Volume 2c</b>), using the recently published strategy review (Woodward, <i>et al.</i>, 2023).</p>
	<p>No dead birds were reported in the Year 1 Report and it was unclear whether this was because there were no dead birds recorded or if they were not included in the report. The Year 2 Final Report records a total of 33 deceased birds from 11 surveys spanning both survey years.</p>	<p>One deceased unidentified swan species was recorded within the year 1 report, therefore dead birds were recorded, but none found of any seabird species.</p>
	<p>NatureScot advice regarding the Year 1 Report strongly recommended giving consideration to local and/or regional mortality events (such as HPAI and auk wrecks) when interpreting results. This has not been addressed in the Year 2 Final Report beyond reporting</p>	<p>Events such as HPAI have been considered in Section 13 of the <b>Offshore RIAA</b> when considering the in-combination impacts of sites</p>

		<p>the number of deceased birds recorded during surveys. We advise the applicant to give proper consideration to mortality events in future assessment, particularly given that the DAS were completed both during and after the main HPAI outbreaks of 2021-2022. It will be important for assessment purposes to consider the current status of seabird populations relative to their status prior to the outbreak. Recent population data for key species at some colonies can be found on the SMP database. In addition, the RSPB have published a report (Tremlett <i>et al.</i>, 2024) on HPAI effects, which will provide useful context.</p>	<p>and species which may result in an adverse effect.</p>
		<p>Flight heights have been estimated from measurements of birds and the use of trigonometry, and results are presented in Section 4 of the report. As stated in our response to the Year 1 Report, we currently recommend the use of generic flight heights from Johnston <i>et al.</i>, (2014) for option 2 of the sCRM tool, as per our Guidance Note 7. If the applicant intends to present additional site-specific flight height data as contextual information, a full description of method, accuracy, precision and comparison with Johnston <i>et al.</i> (2014) with explanation of any differences, will be needed to inform further discussions with NatureScot.</p>	<p>The CRM was undertaken using flight heights provided by Johnston <i>et al.</i> (2014) as set out in <b>Offshore EIAR Appendix 14.3, Volume 2c.</b></p>
		<p>Within the DAS data one of the most important findings is the 35 unidentified Anser geese noted within the array in March 2022, which may equate to over 300 birds based on the tables in the report. It is possible these are Greenland white-fronted geese and on a precautionary approach we advise these are treated as such. Whilst this sub-species is no different in terms of collision risk of other Anser geese, the population is in severe decline and there is an AEWA single species action plan which we are signed up to, which aims to</p>	<p><b>Offshore EIAR Appendix 14.4, Volume 2c</b> applies the recently published Woodward <i>et al.</i> (2023) for assessing migratory birds. This takes into account migratory geese, and applies the most recent SPA populations where relevant.</p>

		<p>minimise additional mortality on the species. Additionally, the population already has some cumulative risks from terrestrial wind farms. Woodward et al 2023 is appropriately precautionary as regards its assessment of Greenland white-fronts but the biogeographic population on last winter's census is now less than 15,000 birds so Woodward is out of date on population size.</p>	
		<p>Due to the proximity of this development to the shore, we recommend that the cumulative assessment should also consider the inclusion of onshore windfarms in the vicinity. You may find the Scottish Government collision risk model for birds on migration useful in your assessment.</p>	<p>The in-combination assessment is presented in Section 13 of the <b>Offshore RIAA</b>, together with identification of the plans and projects included in-combination which includes any onshore wind farms.</p>
		<p>In the terrestrial environment we use Natural Heritage Zone areas to assess impacts on species at a regional level (both stand alone and cumulatively) and in some cases we recommend national level. See the relevant NatureScot guidance here. A significant proportion of bird activity records from the DAS especially in the breeding season will relate to the regional NHZ3 – Coll, Tiree and Outer Hebrides population and the assessment of impacts should include this.</p>	<p>The comment from NatureScot is noted. The approach to offshore assessment follows standard practice and guidance. It is acknowledged that this does not explicitly consider Natural Heritage Zones. Connectivity to SPAs is detailed <b>Offshore RIAA Appendix A</b>, but for the avoidance of doubt, connectivity is identified for red-throated diver as a feature of the Lewis Peatlands SPA.</p>
		<p>We also recommend assessing the connectivity to Lewis Peatlands SPA given the foraging distances of red-throated diver. See the NatureScot guidance on Assessing Connectivity with SPAs, noting the Western isles distances which come from survey for other terrestrial wind farms in Lewis.</p>	<p>Connectivity to SPAs has been assessed for red-throated diver and includes Lewis Peatlands SPA, as set out in the <b>Offshore RIAA Appendix A</b>.</p>
		<p>Overall, we are broadly happy with the information that the DAS provides, given that it is primarily designed as an ornithology survey. However, we do not agree with apportioning unidentified species</p>	<p>With regards to seabirds, individuals that were recorded to group level rather than species level, have been apportioned based on the</p>

		and that all species identified in the DAS should be scoped into the EIA quantitatively where density estimates are available (preferably the highest between DAS or SCANS IV for cetaceans/Carter <i>et al.</i> , for seals, failing that SCANS III, failing that other scientific literature) and where this is not available a qualitative assessment should be carried out.	abundance of the proportions of the seabird species within that group recorded. Details are set out in section 4.2.2 of <b>Offshore EIA Appendix 14.1, Volume 2c</b> .  For details of the assessment undertaken for marine mammals, refer to <b>Offshore EIA Chapter 13, Volume 2a</b> .
NatureScot	Marine Ornithology Consultation Meeting 16 April 2025	Advised that the Migratory (mCRM) tool is now available to be used.	The mCRM tool has been used (see <b>Offshore EIA Appendix 14.4, Volume 2c</b> )
		NatureScot advise that, when using a 'broad front' approach to migratory seabird assessment with WWT Consulting and MacArthur Green (2014), a sense check of whether there is any new information available should be undertaken as the numbers may be different in the ten years since the publication of the report.	The population numbers used for the 'broad front' approach have been updated based on more recent information (see <b>Offshore EIA Appendix 14.4, Volume 2c</b> ).
		Wildfowl & Wetlands Trust (Consulting) Ltd (2014) work was considered slightly controversial and ten years out date. A sense check of whether there is any new information available should be undertaken as the numbers may be different in this ten year period. Advise that NatureScot doesn't want any surprises as part of the submission. If there is anything unusual or unsure how to incorporate something, the Applicant should inform NatureScot and discuss further.	As recommended by NatureScot, the mCRM ( <b>Offshore EIA Appendix 14.4, Volume 2c</b> ) uses the recently published Woodward <i>et al.</i> (2023) for assessing migratory birds.
		Advised that adverse effects that are being compensated, do not need to be assessed in combination, but if the number of birds impacted by a development does not reach the threshold of adverse effect of integrity level they should be considered. Compensated	As agreed with NatureScot and MD-LOT, the only impacts to be excluded from in-combination assessment are those where consent has been issued, and a requirement for compensation confirmed.

	impacts from developments where consent has been issued, and compensation has been secured, do not need to be assessed.	
	Advised we should be careful on “tangible impact”. The 0.02 percentage threshold point for EIA and HRA is considered acceptable. 0.2 birds per year confirmed for HRA.	The agreed thresholds have been applied throughout Section 8 and 13 of the <b>Offshore RIAA and Offshore EIAR Chapter 14, Volume 2a.</b>
	Requested that the barrier effects to fulmar to nearby colonies is considered in a qualitative manner, but no need for a displacement assessment. Advised that Manx Shearwater behaviour is a little more challenging when applying the species to collision risk modelling (CRM) and any results need to be interpreted with caution. This is because they are nocturnal and attracted to lights.	The comment from NatureScot is noted and agreed. Barrier effects are considered for fulmar in Section 8.4 of the <b>Offshore RIAA.</b> CRM was undertaken for Manx shearwater and presented within <b>Offshore EIAR Appendix 14.3, Volume 2c.</b> As there is no guidance as to the change in density due to responses to light, no amendments were applied.
	In the absence of the Northeast and East Ornithology Group (NEEOG) information Niras are to use BDMPS to assess puffin.	The comment from NatureScot is noted and agreed. The BDMPS approach has been used for non-breeding puffin.
	Wish to understand the distances from the development to the SPA’s (straight line and at sea distances) and what the foraging range was (whether it was within or outside foraging range).	Foraging ranges and SPA distances are provided in <b>Offshore EIAR Appendix 14.1, Volume 2c.</b>
	Advised that [Monach Isles SAC] should only be included if the telemetry shows regular use of the development area and associated impact buffer area. Based on this, NatureScot agree this can be screened out.	Noted and agreed.
	NatureScot do not expect to see any other SAC’s [in addition to Langavat SAC and North Harris SAC screened in for Atlantic salmon or freshwater pearl mussels.	Noted and agreed.

		Further consultation will be required on underwater noise impacts during construction due to potential impacts to migrating salmon. NatureScot advised that any queries related to underwater noise should be shared in writing to NatureScot.	Noted and agreed (please see meeting referenced below on 18 July 2025, email received 19 August 2025, letter dated 3 October 2025, meeting 10 October 2025).
		NatureScot confirm that for EIA and HRA, species should be taken through the cumulative assessment if the project alone makes a tangible impact, defined as 0.2 mortalities per year or an increase in the baseline mortality rate by at least 0.02 percentage points.	The comment from NatureScot is noted and has been applied (see Section 13 of the <b>Offshore RIAA</b> ).
		NatureScot confirm that using individual components of the scores given in Wade <i>et al.</i> (2016) rather than overall vulnerability scores would not change the conclusions reached by the Applicant with regards to species and/or SPAs screened in, and that no species/SPAs were missed as a result of the method applied.	The comment from NatureScot is noted and agreed.
		NatureScot advise that Manx shearwater behaviour, in particular nocturnal behaviour and their attraction to lights, is challenging when applying the species to collision risk modelling, and any results therefore need to be interpreted with caution.	The comment from NatureScot is noted. CRM was undertaken for Manx shearwater and presented within <b>Offshore EIAR Appendix 14.3, Volume 2c</b> . As there is no guidance as to the change in density due to responses to light, no amendments were applied.
NatureScot	Answers to further post-scoping questions	NatureScot agree with the Applicant's proposed approaches, which includes using the mCRM tool to assess migratory waterbirds, and Wildlife and Wetlands Trust (Consulting) Ltd (2014) and the migrant collision risk tab of the Band (2012) CRM for migratory seabirds.	The comment is noted and agreed (see Section 8.6 of the <b>Offshore RIAA</b> ).
	08 May 2025	NatureScot confirm they understand the mCRM tool to be accurate and advise it should be used for migratory waterbird species. NatureScot agree with the default parameters built into the mCRM tool, but would advise sense checking the results, and if there are	The comment is noted and agreed (see Section 8.6 of the <b>Offshore RIAA</b> ). As it has been raised separately with NatureScot, the default population values built into the mCRM tool do not match the values given in Woodward <i>et al.</i>

		<p>unusual or unexpected results emerging from the tool to contact them for discussion. (Page 1)</p>	<p>(2023) for all species, and were therefore amended to match Woodward <i>et al.</i> (2023).</p>
		<p>NatureScot agree that, as the Cumulative Effects Framework (CEF) has not yet been published, the Applicant may progress the application and NatureScot would not expect the Applicant to apply the CEF if it is subsequently published.</p> <p>NatureScot acknowledge that the Applicant will need to progress an alternative assessment in order to keep to proposed scheduling, and NatureScot are happy to provide comments on any alternative assessment outline.</p>	<p>The comment is noted and agreed. CEF remains unpublished and could not be used. The data used within the in-combination assessment (Section 13 of the <b>Offshore RIAA</b>) was taken from the NEEOG database as requested by NatureScot. If the NEEOG database did not have the relevant data, the project's application documents were reviewed. Full details on the data used in the in-combination assessment is presented in Section 13.2 of the <b>Offshore RIAA</b>.</p>
		<p>NatureScot agree with the proposed approach for obtaining data for other projects, in particular the use of impact values from the North-East and East Ornithology Group (NEEOG) dataset. NatureScot also accept the approach to obtain values for projects not included in the NEEOG dataset from applications and/or other developer documents.</p>	<p>The comment from NatureScot is noted and has been applied (see Section 13 of the <b>Offshore RIAA</b>).</p>
		<p>At the screening stage of the HRA, the distance between the colony and the array should be measured as the shortest at-sea distance between the edge of the colony and the edge of the array. To determine the distance between an SPA and the array, this distance should be measured between the closest edge of the SPA boundary and the edge of the array, with all colonies making up the SPA included as the SPA is considered to have connectivity with the development. (Page 3)</p>	<p>As agreed with NatureScot, this is the approach that has been applied when assessing connectivity in <b>Offshore RIAA Appendix A</b>.</p>

NatureScot	Email 28 May 2025	Our understanding is the issues around accessing SeabORD have been resolved and we advise you to contact Marine Directorate for the currently available version of SeabORD (MatLAB version). If this is within a timeframe that you are able to incorporate it into your assessment then it should be used, as it remains the recommended method of assessing distributional responses.	SeabORD assessments have been undertaken, as set out in the <b>Offshore EIA Annex 14.2.2, Volume 2c</b> . Where relevant the outputs of SeabORD are also included within Section 8.5 of the <b>Offshore RIAA</b> .
NatureScot	Response to Applicant's Briefing Note 02 June 2025	NatureScot are in agreement with the species that have been scoped in and out of the assessment of collision risk and distributional responses.	The comment from NatureScot is noted and agreed.
		NatureScot advise that the 'commic tern' species group should be apportioned to Arctic and common tern. Given that no common tern were observed in the Array Area or 2 km buffer, it may be the case that all commic tern are apportioned to Arctic tern. However, NatureScot advise that apportioning should consider the species observed in the wider survey area, and if common tern were recorded then commic tern should be appropriately apportioned between both tern species.	When identifying VORs, the implications if all 'commic' terns were assumed to be common terns, and also if all 'commic' terns were assumed to be Arctic terns, were considered. Under that approach, only Arctic tern was identified as a VOR. CRM was carried out for Arctic tern (being a VOR) and again for the densities used as inputs to CRM, applied the precautionary assumption all 'commic' terns were Arctic terns ( <b>Offshore EIA Appendix 14.3, Volume 2c</b> ).
		NatureScot advise that the sensitivity of red-throated diver and great northern diver to collision risk should be classed as 'low' rather than 'very low', citing their vulnerability scores of 60 and 67 respectively from Wade <i>et al.</i> (2016), which are greater than puffin (scoring 0) which is classed as having very low vulnerability.	The density of red-throated diver within the Turbine Area did not justify undertaking CRM, however mCRM was done for the species within <b>Offshore EIA Appendix 14.4, Volume 2c</b>
		NatureScot note that the abundance of diver species should be considered within the Array Area + 4 km buffer rather than 2 km buffer, as in their previous consultation note.	A 4 km buffer from the Turbine Area has been applied for both red throated and great northern diver when undertaking displacement

			assessments ( <b>Offshore EIAR Appendix 14.2, Volume 2c</b> )
NatureScot	Update 09 June 2025	<p><b>Sitelink Conservation and Management Advice</b> – Seabird colony SPAs with marine extensions have recently had their Conservation and Management Advice (CMA) documents uploaded to Sitelink. The list of updated SPAs are as follows:</p> <ul style="list-style-type: none"> <li>• Ailsa Craig SPA;</li> <li>• Buchan Ness to Collieston Coast SPA;</li> <li>• Calf of Eday SPA;</li> <li>• Canna and Sanday SPA;</li> <li>• Cape Wrath SPA;</li> <li>• Copinsay SPA;</li> <li>• East Caithness Cliffs SPA and NC MPA;</li> <li>• Fair Isle SPA;</li> <li>• Fetlar SPA;</li> <li>• Flannan Isles SPA;</li> <li>• Forth Islands SPA;</li> <li>• Foula and Seas off Foula SPA;</li> <li>• Fowlsheugh SPA;</li> <li>• Handa SPA;</li> <li>• Hermaness, Saxa Vord and Valla Field SPA;</li> <li>• Hoy SPA;</li> <li>• Marwick Head SPA;</li> <li>• Mingulay and Berneray SPA;</li> <li>• North Caithness Cliffs SPA;</li> <li>• North Colonsay and Western Cliffs SPA;</li> <li>• North Rona and Sula Sgeir SPA;</li> <li>• Noss SPA;</li> </ul>	Noted and all SPAs screened in on this list have had CMA referenced updated (see <b>Offshore RIAA Appendix B</b> ).

		<ul style="list-style-type: none"> <li>• Rousay SPA;</li> <li>• Rum SPA;</li> <li>• Shiant Isles SPA;</li> <li>• St Abb's Head to Fast Castle SPA;</li> <li>• St Kilda and Seas off St Kilda SPA;</li> <li>• Sule Skerry and Sule Stack SPA;</li> <li>• Sumburgh Head SPA;</li> <li>• Troup, Pennan and Lion's Heads SPA;</li> <li>• West Westray SPA.</li> </ul>	
		<p><b>Scottish Renewables Ornithological Impact Assessment Streamlining project</b> – NatureScot are participating in this project which is looking to deliver short-, medium- and longer-term ambitions to streamline the current OIA process. There are several issues already identified, and in advance of updating our guidance notes, we will provide advice on these aspects to projects as you go through the OIA process, as appropriate. These include:</p> <ul style="list-style-type: none"> <li>• <b><u>Duration to be calculated during PVAs – e.g. 35 and 50 years. We no longer require a 25-year period to be calculated.</u></b></li> </ul> <p>Use of MRSea (especially any project sites where the DAS have observed low numbers) for species.</p>	<p>These points have been noted and applied in the PVA outputs within Section 8 and 13 of the <b>Offshore RIAA.</b></p>
		<p><b>Phased approach</b> – Increasingly we are hearing of the need for multiple applications as part of a project consenting strategy supported by one EIA. If this is likely to be case for your project, then it would be helpful to discuss the approach to the presentation of the impact assessment, particularly in respect of in combination assessment for the RIAA. We wish to see clear and concise</p>	<p>This does not apply to the Offshore Project. The Applicant is not proposing a phased approach.</p>

		approaches, otherwise it is probable that we will need to ask for additional time to assess the applications and provide our advice.	
NatureScot	Update by email 03 July 2025	<p>Concerning the apportioning of migratory collision mortalities we advise the following:</p> <ul style="list-style-type: none"> <li>The developer should aim to use SPA population estimates that are as contemporaneous as possible to the DAS data. We are aware that there are some SPAs which have had counts taken more recently. If these counts are closer in time to the years DAS data was gathered, they should be used instead of the citation count. The developer should confirm with us the SPAs for which they have used more recent count data instead of citation data.</li> <li>In terms of the proposed method, it would be helpful if a more detailed worked example could be provided – using this method for a species that is potentially impacted by the development, and showing how collisions would be apportioned to each of the SPAs screened in.</li> </ul>	These points have been noted and applied in <b>EIAR Appendix 14.4, Volume 2c</b> . A detailed worked example was provided to NatureScot on 05 August 2025.
MD-LOT	Email advice 08 July 2025	No project, other than Berwick Bank, requires both “with” and “without consent” considerations for the assessments.	The comment from MD-LOT is noted and has been applied.
		Any project that has been deemed to require, and has subsequently successfully secured, a derogation case due to the conclusion that the project will have adverse effects on site integrity (“AEoSI”), or at least that MD-LOT is unable to conclude there will be no AEoSI, does not need to have the compensated effects considered within your	The comment from MD-LOT is noted and has been applied (see Section 13 of the <b>Offshore RIAA</b> ).

		<p>assessments. However, all non-compensated aspects of such projects must be considered in the assessments.</p>	
		<p>Any project that has not been consented but has the potential to require derogations should still be considered in full within the assessments. Discounting impacts included within a derogation case on the basis of an unapproved compensations package would imply prejudgement of the outcome of that derogation case's determination on MD-LOT's part, which would be inappropriate. MD-LOT is content that the approach you set out in your email on 26 June 2025 (attached) is in line with this advice.</p>	<p>The comment from MD-LOT is noted and has been applied (see Section 13 the <b>Offshore RIAA</b>).</p>
		<p>In terms of distinctions between the EIAR's cumulative impact assessment and the RIAA's in combination assessment, MD-LOT would expect there to at least be narration within the EIAR that certain project impacts will be compensated for and to explain how this has been considered.</p>	<p>The comment from MD-LOT is noted and has been applied (see Section 13 of the <b>Offshore RIAA</b> and Section 14.13 of the <b>Offshore EIAR Chapter 14, Volume 2a</b>).</p>
		<p>Furthermore, with regards to the Zone of Influence tab in the attached spreadsheet, MD-LOT advises that several species that have greater foraging distances than gannet have been established to have theoretical connectivity with the project. Of these, the species with the greatest mean max. foraging range is Manx shearwater at 2365.5km. MD-LOT recommends that this value +1S.D. should be used for assessments instead of the gannet value unless there is a specific reason for using the latter. If so, please send justification for this to MD-LOT and NatureScot, for consideration.</p> <p>The above will have implications on the projects identified in the "Marine Ornithology Screened In" tab. You should revise the projects included using the Manx shearwater foraging range.</p>	<p>The screening of in-combination projects has been adjusted to include projects within the foraging range of Manx shearwater. See list of other projects considered as part of the in-combination assessment within Section 2.5.6 of the <b>Offshore RIAA</b> and <b>Offshore RIAA Appendix G</b>.</p>

		<p>Furthermore, could you please elaborate on the criteria for identifying projects screened into the assessments? MD-LOT’s current interpretation of the criteria set out in the “User Info and Key Terms” tab is that only major infrastructure developments or projects “of an equivalent scale” to Spiorad na Mara have been included. This would not be appropriate and seems to have led to the omission of smaller scale projects that are still very much capable of having cumulative/in combination effects with Spiorad na Mara e.g. Pentland Floating Offshore Wind Farm, Levenmouth Demonstration Turbine, Forthwind etc. The criteria for including projects in the cumulative effects and in combination assessments may need to be broadened to include all projects capable of having such effects in combination with Spiorad na Mara.</p>	<p>Projects are screened in to the in-combination assessment based on connectivity to the SPAs and not scale of project as described within Section 2.4 of the <b>Offshore RIAA</b>.</p>
<p>MD-LOT and NatureScot</p>	<p>Fish assessment discussion 18 July 2025</p>	<p>Agreed that stationary and fleeing modelled scenarios will be presented</p> <p>The discussion focused on the potential hydrological and ecological connectivity between the two Special Areas of Conservation (SACs) in question—North Harris SAC and Langavat SAC—and the implications for the Habitats Regulations Assessment (HRA). While there is a hydrological connection between the two SACs, it is not suitable for salmon movement. The Langavat system effectively ends at the head of the Abhainn Langadail, and the boundary between the two SACs becomes a first-order stream, which is not passable by salmon. Therefore, although water flows between the systems, they are not connected in a way that supports salmon migration. The two SACs should be treated as distinct systems for the purposes of the HRA.</p>	<p>Noted, both presented within Section 7 of the <b>Offshore RIAA</b>.</p> <p>Comment noted and used to inform the assessment within Section 7 of the <b>Offshore RIAA</b>. North Harris SAC and Langavat SAC have been treated as distinct systems for the purposes of the HRA.</p>

		<p>NatureScot’s position was confirmed that there is no meaningful connectivity between the two SACs in terms of salmon movement.</p>	
		<p>This conclusion also helped clarify the approach to assessing potential impacts on freshwater pearl mussels, which are present in the North Harris SAC.</p> <p>It agreed that if there is no adverse effect on the salmon population, then there would be no adverse effect on the mussels, given their reliance on salmonids for part of their life cycle.</p>	<p>Comment noted and used to inform the assessment within Section 7 of the <b>Offshore RIAA</b>.</p>
		<p>The discussion on conservation objectives focused on how underwater noise impacts from the Spiorad na Mara project should be assessed in relation to the qualifying features of the screened-in SACs, particularly Atlantic salmon and freshwater pearl mussel.</p> <p>The team agreed that for underwater noise, the relevant conservation objectives are those that relate to:</p> <ul style="list-style-type: none"> <li>• Population viability (e.g. survival and reproduction of Atlantic salmon),</li> <li>• Distribution within the site (i.e. access to and from rivers),</li> <li>• Avoidance of significant disturbance (e.g. behavioural changes that could affect spawning success).</li> <li>• It was also noted that supporting habitats—such as marine feeding grounds or migratory corridors—should be considered where relevant, even if they lie outside the SAC boundary.</li> <li>• The group concluded that the assessment should: <ul style="list-style-type: none"> <li>– Focus on the conservation objectives most relevant to underwater noise,</li> <li>– Clearly justify the inclusion or exclusion of each objective,</li> </ul> </li> </ul>	<p>Noted and implemented within Section 7 of the <b>Offshore RIAA</b>.</p>

		<ul style="list-style-type: none"> <li>- Consider the full life cycle of Atlantic salmon, including marine phases,</li> <li>- Be transparent about assumptions and data limitations.</li> </ul>	
		<p><b>Modelling Behavioural Scenarios:</b> The assessment distinguishes between smolts and adult salmon. Smolts will be modelled using a movement-based scenario, reflecting their rapid downstream migration; Adults are assessed using a stationary model, acknowledging their tendency to linger in coastal areas while locating river entry points.</p> <p>This distinction was supported by Marine Directorate, noting that adults may remain in the area for extended periods, while smolts typically transit quickly. NatureScot agreed that both scenarios should be presented, with the stationary model representing a worst-case exposure.</p>	<p>Noted and implemented within Section 7 of the <b>Offshore RIAA</b>.</p>
		<p><b>Data Limitations and Proportional Assessment:</b> Due to the lack of robust fish density data, NIRAS proposed using proportional estimates (e.g. percentage of population exposed per day) rather than absolute numbers. Marine Directorate suggested this could help avoid over-reliance on uncertain figures.</p> <p>NatureScot cautioned that extrapolating from rod catch data introduces significant uncertainty but acknowledged it may be the only available dataset. Recommended consulting the Freshwater Lab for guidance on how catch data is extrapolated for conservation assessments.</p>	<p>Consultation was undertaken with the Freshwater Lab. How that information has been applied is set out in <b>Offshore EIAR Chapter 12, Volume 2a</b>.</p>
		<p><b>Transparency and Monitoring:</b> Stakeholders emphasised the importance of being transparent about data limitations and clearly stating what additional data would improve confidence. They</p>	<p>Data gaps are clearly set out in <b>Offshore EIAR Chapter 12, Volume 2a</b>.</p>

		encouraged the team to propose monitoring or validation measures to support the assessment and inform future projects.	The Applicant may choose to undertake a dedicated study (prior to construction commencing) to understand if the Percussive Piling Programme could be extended into April/May. The purpose of this study would be to provide further information on the timing of smolt emigration through Loch Roag/Loch Ròg. (see <b>Offshore EIAR Appendix 12.3, Volume 2c</b> for further details).
National Trust for Scotland	Email Meeting follow up 08 August 2025	I think there seem to have been a slight misunderstanding of the points made on the call, we were saying that guillemot/razorbill foraging ranges are generally underestimated and can vary substantially site-by-site, due to lack of tracking data. There is no tracking data available from Mingulay, Berneray or Pabbay, a potential knowledge gap which could be filled if you were interested in collaborating with us to collect some next year?	Noted. Guillemot has not been included within the Section 8 of the <b>Offshore RIAA</b> for the Mingulay and Berneray SPA due to the SPA being 180.9 km from the Offshore Project Boundary and therefore over the foraging range of guillemot (95.2 km: MM + 1SD excluding data from Fair Isle).
NatureScot	Email Responses to questions in Consultation briefing note 15 August 2025	Thank you for raising these points about the NEEOG dataset.  The NEEOG dataset was created as a developer-led solution to delays in the publication of the CEF, and functions as an interim CEF, which we have accepted the use of mainly in relation to projects in the ScotWind NE and E clusters  As such NatureScot is not responsible for the dataset or its updates/maintenance. It's our understanding that the NEEOG dataset was always intended to be produced/ updated in tranches, recognising that ScotWind projects will be reaching the application stage at different points in time. Given this iterated approach to updating the	Noted. The comment from NatureScot is noted and the NEEOG dataset has been used for the in-combination assessments where appropriate. Where there is no information on the project, the application documents have been reviewed. See Section 13 of the <b>Offshore RIAA</b> with information on which projects are covered by NEEOG and which required the use of their application documents.

		<p>NEEOG dataset it may be beneficial if the concerns that you have raised here could be provided as feedback to NEEOG so that the next iteration may address these concerns.</p> <p>With regard to the assessment for Spiorad na Mara - for the sake of consistency and compatibility across applications, we advise that the NEEOG dataset should be used. You are welcome to run an alternate version of the analysis using your own dataset, but we strongly recommend that this is done in addition to analysis based on the NEEOG dataset, and that any differences in approach between these two analyses are clearly stated and explained in detail.</p> <p>Finally, the NEEOG interim CEF will be replaced by the final CEF when it is released. We expect the final CEF to be released in Autumn this year.</p>	
NatureScot	Email Underwater noise and salmon assessment approach and mitigation 19 August 2025	<p>Thank you for sharing the Technical Note - Atlantic Salmon Post Smolt Swim Speeds (dated 08 08 2025).</p> <p>We have reviewed the paper and note the following points:</p> <p>Paragraph 1.2.6 includes a range of swim speeds from various published papers:  2 body lengths/ second – smolt and post smolt lab studies (Fangstam 1993)  4.4 body lengths/ second – smolt and post smolt lab studies (Booth 1998)  2.5 body lengths/ second – larger post smolts and adult Atlantic salmon (Booth 1998, Tang and Wardle 1992)</p>	Further written response provided via email , with the updated ('Technical Note – Atlantic Salmon Port-Smolt Swim Speeds', dated 16/09/25) to address comments. Comments followed up in subsequent consultation referenced below (MD-SEDD letter 3 October 2025, meeting 10 October 2025).

		<p>Paragraph 1.2.7 discusses the Grimersta tagging study and the recorded migration speeds. It then seems to select the fastest swim speed of 4.4 body lengths/ second and apply this to the measured lengths of the tagged fish to give a range of possible swim speeds for Grimersta post smolts.</p> <p>Section 1.3 concludes by presenting the mean body length of the tagged Grimersta post smolts, and uses the 4.4 body lengths/ second swim speed to derive a mean swim speed of 0.604 m s<sup>-1</sup></p> <p>However, we noted the following discussion points on swim speeds from the meeting held on Friday 18 July:</p> <p>MD-SEDD - commonly used speed is 1.2 body lengths per second  NatureScot - precautionary approach should use the lower available estimated swim speed  NIRAS - we will look at the available swim speeds and set out a proposal in writing</p> <p>The above discussion points from MD-SEDD and NatureScot do not seem to align with the selection of the fastest swim speed from the literature review in the Technical Paper. Our view is that a precautionary approach should be adopted, particularly where such significant data gaps remain.</p> <p>To take account of fish behaviour we would suggest using one of the slower swim speeds to how represent the post smolt fish are likely to</p>	
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		<p>traverse the array, which is unlikely to be in a straight line at the 0.604 ms<sup>-1</sup>.</p>	
<p>NatureScot</p>	<p>Email mCRM apportioning advice 21 August 2025</p>	<p>Our understanding of the proposed method is as follows:</p> <ul style="list-style-type: none"> <li>• Apportioning weight = SPA population/biogeographic population</li> <li>• Apportioned collision estimate = apportioning weight * mCRM collision mortalities estimate</li> </ul> <p><b>Use of biogeographic population in apportioning</b></p> <p>We have some concerns that apportioning impact to SPAs via biogeographic population is not biologically realistic and may underestimate the impact to each SPA.</p> <p>The migratory CRM tool estimates collision mortalities based on an estimate of the number of birds expected to pass through the wind farm development area. This estimate is calculated by randomly sampling lines from a large number of straight lines which have been randomly generated between UK and non-UK points. The proportion of the sampled lines which overlap the wind farm development area is then used to represent the proportion of the population that might pass through the region. As such, the collision risk modelling is performed within the context of the proportion of birds migrating between UK and non-UK points. For example, if UK proportion is set to 0 in the mCRM app, no collisions are predicted.</p> <p>Therefore, collision mortalities should be apportioned based on the UK population, not the biogeographic population estimate</p>	<p>To confirm the approach to migratory CRM is applied in <b>Offshore EIAR Appendix 14.4, Volume 2c</b> and <b>Offshore RIAA Appendix D</b>.</p> <p>SPA population estimates applied are confirmed in <b>Offshore RIAA Appendix D</b>.</p> <p>Apportioning of all mortalities has been applied in <b>Offshore RIAA Appendix D</b>.</p>

		<p><b>Use of latest counts</b> We are content with the stated approach to use the latest counts, but please ensure that the SPA population estimates are as contemporaneous as possible to your DAS data.</p> <p><b>Threshold of one bird per annum</b> After reviewing the work through provided, we are not content with the use of a threshold of one bird per annum for apportioning as proposed in the first email in this chain. The impact of one mortality is highly dependent on the size of the population it belongs to. We note that the provided work through shows the apportioning of all mortalities even in cases with fewer than one mortality per annum - this is the approach that should be followed.</p>	
RSPB Scotland (Outer Hebrides)	Email received 09/09/2025	RPSB Outer Hebrides providing information on large counts of migratory species that they had been noticing. This included "1000+ Sooty shearwater, 200+ Cory's shearwater along with smaller numbers of great shearwater and both storm-petrel and leach's petrel in 90mins" and "1000+ Manx shearwater, a few hundred sooty shearwater along with smaller numbers of both storm and leach's petrel and pomarine skua in just 1hr".	The Applicant responded to RSPB Outer Hebrides on 06 February 2026 confirming that the number of birds observed have been accounted for within the mCRM ( <b>Offshore EIAR Appendix 14.4, Volume 2c</b> ) and that these numbers are known to exist within this area, as described within <b>Offshore EIAR Appendix 14.1, Volume 2c</b> .
MD-SEDD	Letter 03 October 2025	Letter responding to the numbered points tabulated at the end of the meeting minutes (minutes to the meeting with MD-LOT, MD-SEDD and NatureScot on 18/07/25, referenced above).	Please see responses to individual points.
		Response to questions 1 (confirmation that assumptions discussed were appropriate for EIAR and RIAA), 8 (confirmation on the key migration windows) and 9 (confirmation on the key diel activity patterns). MD-SEDD advise that Malcolm et al. (2015) should be	Atlantic salmon migratory window referenced and applied within the <b>Offshore RIAA</b> are confirmed within and drawn from <b>Offshore EIAR Chapter 12, Volume 2a</b> . All life stages of

		<p>consulted to determine the sensitive window when large numbers of smolts are likely to be in the coastal zone. MD-SEDD also advise that local information on smolt movements should be considered. MD-SEDD advise that salmon post smolt movements should not be confined to either day or night. MD-SEDD advise that Smolts do not show a diel pattern once in the marine environment, the data presented by the applicant in the meeting supports this with tagged fish detected within the array area at most hours of the day. MD-SEDD advise that the migration of all life stages of Atlantic salmon should be considered in the assessment.</p>	<p>Atlantic salmon are considered within Section 7 of the <b>Offshore RIAA</b>.</p>
		<p>Response to questions 2 (any assumptions with regards to coastal movement corridors for Atlantic Salmon) and 10 (confirmation on the expected key migratory pathway for Atlantic salmon returning to natal rivers). MD-SEDD are not clear on how the proposed 1.5km migratory corridor will be used in the assessment. The data presented by the applicant shows at least 39% of smolts detected leaving the SAC were detected on the array area which is outside a 1.5km migratory corridor. No information is available on the coastal corridors of Adult salmon although tagged adult salmon from Armadale have been shown to migrate considerable distances from shore. Scottish Marine and Freshwater Science Vol 6 No 16: Genetic Assignment of Marine-caught Adult Salmon at Armadale to Region of Origin. A coastal corridor is likely to extend for many kilometres from shore as discussed and recorded under section 8 of the minutes.</p>	<p>The 1.5 km migratory corridor referenced relates the 'purple zone' mitigation, which is considered as part of the assessment in Section 7.2.1 and Section 7.3.2 of the <b>Offshore RIAA</b>. Uncertainty around migratory routes used is incorporated into and taken into account within the assessment. In addition, TTS as a threshold is taken into account with that assessment..</p>
		<p>Response to question 3 (views on suitability of the UWN threshold used and any alternative perspectives). MD-SEDD confirms that TTS threshold presented in Underwater Noise_Atlantic salmon Technical Note_Final v0.4.pdf is to be used in the Assessment.</p>	<p>Noted and applied in the <b>Offshore RIAA</b> assessment (see Section 7.2.1 and 7.3.2).</p>

		<p>Response to questions 4 (whether the current UWN assumptions appropriate for EIAR/HRA), 5 (whether NatureScot would support a more realistic scenario to better reflect migratory behaviour) and 6 (whether stakeholders agree with incorporating UWN into the modelling approach). MD-SEDD note that the e-mail sent from the applicant on 16 September 2025 clarified that a dual assessment approach for both stationary and swimming behaviours will be used in the EIA/HRA assessment. A swim speed of 1.2 BL/s will be used for modelling in unsonified environments with a swim speed of 4.4 BL/s for sustained swimming in periods of behavioural avoidance. MD-SEDD are content with this approach.</p>	<p>The <b>Offshore RIAA</b> outlines swim speeds used in Section 7.2.1.</p>
		<p>Response to question 7 (confirmation on the key migration windows). MD-SEDD advise that the protected status of Atlantic salmon should be considered (e.g. Atlantic salmon are a qualifying interest in the designated Special Areas of Conservation within the proposed development area) in addition to the significant declines in the wild Atlantic salmon populations over recent years and the reclassification of global populations of Atlantic salmon, by the International Union for the Conservation of Nature (IUCN), from Least Concern to Near Threatened.</p>	<p>The <b>Offshore RIAA</b> assesses the impact to Atlantic salmon with respect to the two SACs screened in. Information relevant to Atlantic salmon more widely is taken into account within <b>Offshore EIAR Chapter 12: Fish Ecology, Volume 2a.</b></p>
		<p>Response to question 11 (any feedback or alternative perspectives on the precautionary threshold used, and suitability of Option 2 (temporal assessment) as preferred method for estimating exposure). MD-SEDD agree on the use of Option 2 proxy within the assessment</p>	<p>How rod catch data is included in the assessment (including uncertainty) is acknowledged in Section 7.3.2 of the <b>Offshore RIAA.</b></p>
		<p>Response to question 12 (advice on whether salmon from North Harris SAC could enter/exit via Loch Roag). MD-SEDD advise this is already recorded within the minutes of the meeting and discuss by</p>	<p>Noted and acknowledged that although there is hydrological connectivity between the North Harris SAC and the Langavat SAC, the sites are not connected for salmon migration.</p>

		Nature Scot within the meeting. MD-SEDD agree with the information provided within the minutes.	
		Response to questions 13 (opinion on the existing measures incorporated into the Project) and 14 (opinion on potential further measures (if required) and any further mitigation measures that the Project could consider). MD-SEDD advise that all proposed mitigation measures should be presented in a mitigation plan as part of the EIA application. MD-SEDD reiterate the measures discussed and recorded in section 13 of the minutes and specifically highlight the need to consider timing of construction activities around key migration periods.	Mitigation measures (embedded and secondary) taken into consideration in the <b>Offshore RIAA</b> for migratory fish and FWPM are outlined in Section 7.2.1 of the <b>Offshore RIAA</b> .
NatureScot MD-SEDD MD-LOT	Meeting Underwater noise and salmon assessment update 10 October 2025	NatureScot asked whether there could be better phasing of piling activities in relation to ground conditions and the amount of piling required in particular areas, to further reduce risks to migrating salmon.	The Project Team responded that the choice of hammer energy and piling duration is influenced by site-specific ground conditions, which will be determined by detailed geophysical surveys. The project team agreed that phasing could be optimised as more data becomes available. The Offshore RIAA outlines the embedded and secondary mitigation taken into account for the assessment of impact from underwater noise in Section 7.2.1, with the assessment in Section 7.3 and particularly in Section 7.3.2 drawing on secondary mitigation where referenced.
MD-LOT	Email received 14 October 2025	MD-LOT confirmed that previous advice (08 July 2025) was still valid albeit with the application due to be submitted in January 2026 which was slightly delayed than first reported to MD-LOT.	The Applicant notes that the advice provided in July 2025 is still valid and has been followed throughout <b>Offshore EIAR Chapter 14, Volume 2a</b> and specifically Section 14.14 of

			<p><b>Offshore EIAR Chapter 14, Volume 2a</b> which assesses the cumulative effects.</p>
		<p>MD-LOT confirmed that <i>"In relation to future projects, projects that have a submitted scoping report up to six months prior to application are to be included"</i> in reference to offshore projects and <i>"In relation to future projects, projects that have a submitted scoping report up to three months prior to application are to be included"</i> in reference to onshore projects.' Is an appropriate time period for inclusion of projects within the CEA shortlist.</p>	<p>The Applicant has updated the CEA development list (<b>Offshore EIAR Appendix 5.3, Volume 1c</b>) to align with the agreed timeframes for inclusion of projects. <b>Offshore EIAR Appendix 5.3, Volume 1c</b> has been used within the CEA for Marine and Nearshore Ornithology.</p>

## 1.2 GLOSSARY AND ABBREVIATIONS

1.2.1.1 A list of key terms and acronyms used in this appendix are provided in **Table 1-2** and **Table 1-3**.

Table 1-2 Acronyms and abbreviations

Term	Definition
AEOI	Adverse effects on site integrity
AEWA	African-Eurasian Migratory Waterbirds
BDMPS	Biological defined minimum population scale
CEF	Cumulative effects framework
CMA	Conservation and Management Advice
CRM	Collision risk modelling
DAS	Digital aerial survey
EIA	Environmental impact assessment
EIAR	Environmental impact assessment report
EMF	Electro-magnetic field
EPS	European Protected Species
FeAST	Feature Activity Sensitivity Tool
FWPM	Freshwater pearl mussel
HPAI	Highly pathogenic avian influenza
HRA	Habitat regulations appraisal
HWDT	Hebridean Whale and Dolphin Trust
INNS	Invasive non-native species
JNCC	Joint Nature Conservation Committee
LSE	Likely significant effect
mCRM	Migratory collision risk modelling
MD-LOT	Marine directorate licensing operations team
MM	Mean-max
MPA	Marine Protected Areas
NCMPA	Nature Conservation Marine Protected Area
NEEOG	Northeast and East Ornithology Group
NMFS	National Marine Fisheries Service
NGO	Non-governmental organisation
O&M	Operation & maintenance
OCAS	Offshore Cable Area of Search
OIA	Ornithological Impact Assessment
OWEKH	Offshore Wind and Evidence Knowledge Hub
OWF	Offshore Wind Farm
OWSMRF	Offshore Wind Strategic Monitoring and Research Forum
PVA	Population viability analysis
RIAA	Report to inform appropriate assessment
RSPB	Royal Society for the Protection of Birds

<b>Term</b>	<b>Definition</b>
SAC	Special area of conservation
SD	Standard deviation
SMP	Sectoral Marine Plan
SMRU	Scottish Sea Mammal Research Unit
SNCB	Statutory Nature Conservation Body
SPA	Special protection area
SPAN	Scottish Passive Acoustic Network
TTS	Temporary Threshold Shift
UK	United Kingdom
UWN	Underwater noise
UXO	Unexplored ordnance
VOR	Valued Ornithological Receptor
WDC	Whale and Dolphin Conservation
WIDSFB	Western Isles District Salmon Fisheries Board
ZoI	Zone of influence
ZSL	Zoological Society of London

Table 1-3 Glossary

<b>Term</b>	<b>Meaning</b>
Applicant (the)	Spiorad na Mara Limited (the Project owner).
Array Area	The offshore area within which the offshore wind turbine generators (WTGs), associated foundations, Offshore Cables, and Offshore Substation Platform (OSP) (if required), will be located. This area encompasses the Turbine Area that will contain all above water surface infrastructure (WTGs / OSP) and an additional area within which further below water infrastructure (foundations and cables) may also be located.
Competent Authority	A competent authority is the authority with the power or duty to determine whether or not a proposal can proceed. A competent authority may include any Minister, government department, public or statutory undertaker, public body of any description, or person holding a public office.
Cumulative effects	Considers the likely significant effects of multiple impacts and activities from several developments.
Derogation	Term used in HRA to apply to the Stages post Appropriate Assessment (if required). Includes consideration of alternatives, IROPI and the requirement for compensation.
Displacement	Individuals that are not able to forage within the wind farm footprint and must find a new foraging location are classified as suffering from displacement.

Term	Meaning
Distributional Response	Defined by NatureScot (NatureScot (2023h)). The two key distributional responses assessed in relation to offshore wind farms are displacement and barrier effects.
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the importance, or sensitivity, of the receptor or resource in accordance with defined significance criteria.
Embedded or 'Designed-in' Mitigation	Mitigation measures to avoid or reduce environmental effects that are directly incorporated into the preferred design for the Project. This can include standard practice in accordance with or without guidance. Embedded mitigation is considered as part of the impact assessment, before effect significance is identified.
Environmental Impact Assessment (EIA)	The process of evaluating the likely significant environmental effects of a proposed project or development over and above the existing circumstances (or 'baseline').
Environmental Impact Assessment Report (EIAR)	The Environmental Impact Assessment Report (EIAR) prepared to assess the likely significant effects of the Project on the environment.
European Sites	Formerly known as 'Natura Sites', European Sites are those that are designated through the Habitats Directive and Birds Directive (via national legislation as appropriate). European sites in Scotland/ <i>Alba</i> are considered to be Special Protection Areas (SPAs), Special Areas of Conservation (SACs), candidate SACs and Sites of Community Importance (SCI), Potential SPAs (pSPA), possible SACs (pSACs), Ramsar sites (designated under international convention) and proposed Ramsar sites.
Habitat Regulations Appraisal (HRA)	Under the Habitats Regulations, all competent authorities must consider whether any plan or project could affect a European site before it can be authorised or carried out. This includes considering whether it will have a 'likely significant effect' on a European site, and if so, they must carry out an 'appropriate assessment' (AA). This process, known as Habitats Regulations Appraisal (HRA) determines likely significant effects and (where appropriate) assesses adverse impacts on the integrity of European sites. The process consists of up several sequential stages, which include: screening for LSE, appropriate assessment to determine AEOI, assessment of alternative solutions, assessment of imperative reasons of over-riding public interest (IROPI) and compensatory measures.
Impact	Change that is caused by an action; for example, land clearing (action) during construction which results in habitat loss (impact).

Term	Meaning
In-combination	Used to refer to the effects of the Project on a European Site in-combination with other relevant plans and projects with potential to contribute to a likely significant effect (LSE) or adverse effect on the integrity of that European Site.
Landfall	This consists of works from offshore Horizontal Directional Drill (HDD) exit pits (located below MLWS) to onshore at the Transition Joint Bays (TJB) (located above MHWS). The infrastructure and installation methods associated with the Landfall involves both onshore and offshore components.
Marine Directorate - Licensing Operations Team (MD-LOT)	The regulator for determining marine licence applications on behalf of the Scottish Ministers in the Scottish inshore region (between 0 and 12 nautical miles) under the Marine (Scotland) Act 2010, and in the Scottish offshore region (between 12 and 200 nautical miles) under the Marine and Coastal Access Act 2009.
Offshore Application	The application for a marine licence under the Marine (Scotland) Act 2010 (between 0 and 12nm) and a Section 36 consent under the Electricity Act 1989.
Offshore Project	The offshore components of the Spiorad na Mara offshore wind farm (the Project) located seaward of Mean High Water Springs (MHWS).
Project	The Spiorad na Mara offshore wind farm development. This term describes the whole development, including all offshore and onshore components. .
Project Design Envelope (PDE)	A description of the range of possible components that make up the Project design options under consideration when the exact engineering parameters are not yet known.
Receptor	Any physical, biological or anthropogenic element of the environment that may be affected or impacted by the Project. Receptors can include natural features such as the seabed and wildlife habitats as well as man-made features like fishing vessels and cultural heritage sites.
Report to Inform Appropriate Assessment	Report prepared to provide a Competent Authority with the information necessary to undertake an Appropriate Assessment (AA). This has been provided alongside other application documents.
Scoping	An early stage of the EIA process wherein the key potential significant impacts of the Project are identified, and methodologies identified for how these should be assessed. This process gives relevant authorities and key consultees opportunity to comment and define scope and level of detail to be provided as part of the EIAR, which can then be tailored through the consultation process.
Scoping Opinion	A report presenting the written opinion of the Scottish Ministers, with input from Comhairle nan Eilean Siar (CnES) for the OTW, as

Term	Meaning
	to the scope and level of detail of information to be provided in the Environmental Impact Assessment (EIA) for the Project.
Scottish Ministers	The Ministers of the devolved Scottish Government, who exercise statutory functions transferred from the UK Government. The Scottish Ministers support the First Minister in leading the Scottish Government.
Screening	The HRA stage to determine if the Project is likely to have a significant effect on a European Site on its own or in combination with other proposals.
Special Area of Conservation (SAC)	An area designated under the EC Habitats Directive to ensure that rare, endangered or vulnerable habitats or species of community interest are either maintained at or restored to a favourable conservation status.
Special Protection Area (SPA)	An area designated under the Wild Birds Directive (Directive 74/409/EEC) to protect important bird habitats. Implemented under the Wildlife and Countryside Act 1981.
Wind Turbine Generator (WTG)	The wind turbines that generate electricity consisting of tubular towers and blades attached to a nacelle housing mechanical and electrical generating equipment .

### 1.3 REFERENCES

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