

## Appendix I: Consultation Representations and Advice

# Aberdeen International Airport

FAO Emma Lees  
Marine Scotland – Marine Planning and Police

*Via Email*

ABZ Ref: ABZ3132

27<sup>th</sup> April 2023

Dear Emma

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION AND  
MARINE LICENCES FOR THE SALAMANDER OFFSHORE WIND FARM LOCATED 35  
KILOMETRES EAST OFF THE COAST OF PETERHEAD**

I refer to your request for scoping opinion received in this office on 16<sup>th</sup> March 2023.

The scoping report submitted has been examined from an aerodrome safeguarding perspective and we would make the following observations:

- The proposed site is located within the wind farm consultation zone and Instrument Flight Procedure area for Aberdeen Airport and as such aviation impacts should be considered as part of the EIA.
- Some of the proposed turbines may be detected by Aberdeen Airport's primary surveillance radar and generate clutter on air traffic control displays and mitigation may be required.

Our position with regard to this proposal will only be confirmed once the turbine details are finalized and we have been consulted on a full planning application. At that time we will carry out a full safeguarding impact assessment and will consider our position in light of, inter alia, operation impact and cumulative effects.

Yours Sincerely  
[Redacted]

Kirsteen MacDonald

Safeguarding Manager  
Aberdeen Airport  
[Redacted]

[abzsafeguard@aiairport.com](mailto:abzsafeguard@aiairport.com)

Aberdeenshire Council



Our Ref: ENQ/2023/0421

Your Ref:

Ask for: James Hewitt

[Redacted]

Salamander Offshore Wind Farm

26 April 2023

Dear Sir/Madam

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

**EIA Screening/Scoping Opinion for Onshore Aspect of Salamander Offshore Wind Farm Project for Erection of 7 Offshore Wind Turbines and Associated Land Based Infrastructure at Salamander Offshore Wind Farm, 35 Km East Of Peterhead, Aberdeenshire**  
**Grid Reference: 411321.849957**

I refer to your request for a scoping opinion for the above proposal which was submitted to Marine Scotland. Aberdeenshire Council has been consulted in relation to this request for a Scoping Opinion in its role as Local Planning Authority. Having had regard to the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the supporting information, please find details of the response on behalf of Aberdeenshire Council below.

I note that a decision has yet to be made on the consenting approach for this development. Deemed consent may be sought as part of the Marine Licensing, or a separate applications may be made in respect of Marine Licensing and Town and Country Planning. Please note that this response relates solely to the terrestrial aspects of the development.

Scoping Advice

Schedule 4 of the Regulations states the information which should be included in an Environmental Impact Assessment Report (EIA Report). These guidelines offer the backbone to the structure of an EIA Report and should be used as the basis for your submission.

In order to make an assessment of the above information there are specific criteria and guidance set out in Schedule 4 of the Regulations. In particular these include characteristics of the development, an outline of any alternative options/sites and the main reasons for the options/sites chosen. Environmental issues are of obvious key importance such as those aspects of the environment that would be likely to be significantly affected.

Detailed survey work would be required to inform the EIA Report. Following analysis of the aspects of the environment which would be likely to be significantly affected, a detailed assessment of the effects themselves would be required along with mitigation measures proposed.

Examples of the types of issues that may be addressed include:

- Climate change
- Local Economic Effect
- Landscape and Visual Impact
- Soils and geology
- Ecology and Ornithology
- Hydrology and Water Supplies
- Forestry and Tree Felling
- Transport and Traffic including road safety issues and impact on local road network during and after construction work
- Noise
- Cultural Heritage and archaeology
- Land Use
- Land Ownership
- Tourism and Recreation, including footpaths
- A combine Schedule of Proposed mitigation measures

Please note that the above list is by no means exhaustive and that other issues might become obvious following public consultations and consultations with statutory consultees.

### Review of Scoping Report

I have reviewed the Scoping Report which was submitted alongside this request. As stated above, my comments relate solely to the terrestrial aspects of the proposal.

I am satisfied with the approach outlined within the Scoping Report and consider it to be orthodox. Where a deviation from recognised practice is proposed (such as the SLVIA study area), it has been reasoned within the report.

In relation to Terrestrial aspects of the development, I note that the following topics are proposed:

- Geology, Hydrology and Hydrogeology
- Ornithology
- Ecology
- Cultural Heritage (including Archaeology)
- Air Quality
- Landscape and Visual Impact
- Traffic and Transport
- Noise and Vibration
- Land Use

I am satisfied with the content of the Scoping Report in relation to the above chapters and have limited further comments to make. However please see some comments below:

- In terms of structuring the EIA, I would recommend that each topic (as listed above) is given a distinct chapter. The Scoping Report include Cultural Heritage as a subsection of Human Health. Whilst this was justified (through a broad definition of Human Health), it would be unintuitive for a lay person who may wish to review the EIA during any application process.
- With regard to Cultural Heritage, a limited amount of listed building has been identified for assessment. This is reasoned satisfactorily within the report, on the grounds of theoretical visibility. However, no such exercise is evident for Conservation Areas within Peterhead. Whilst it is likely that these may be scoped out, consideration must be given to their inclusion at this stage.
- With regard to the selection of viewpoints for the terrestrial LVIA, I am open to discussing any viewpoints that you may wish to propose. I believe your approach in terms of identifying receptor types is correct.

In addition to the above comments, I have consulted with other sections of the Council. Their responses shall be appended to this letter. In those instances where we have received no response, I shall pass on any future correspondence which we may receive.

### **Roads Development - Buchan**

See appended response

### **Environment Team - Buchan**

The Service holds no objection to the proposed scope of assessment. It is noted that NatureScot will play a key role in the consenting process as the impact of the development may impact upon nationally and internationally designated sites.

It is noted that consent is sought through Marine Licencing and deemed Planning Permission, the responsibility for Habitats Regulations would lie with Marine Scotland as the determining authority.

### **Flood Risk and Coastal Protection**

The Service notes that the applicant has previously engaged with the Service prior to scoping and considers to Scoping Approach to generally reflect their expectation.

### **Contaminated Land Officer**

See appended response

### **Business Development Executive (B)**

No Response

### **Transportation**

No Response

I hope the above information is of assistance as a formal scoping opinion in respect of the relevant EIA Report. Obviously during the processing of any associated planning application other issues may become obvious following public consultation and consultations with statutory consultees.

Yours faithfully

[Redacted]

Paul Macari  
Head of Planning and Economy

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**From:** Peter Exon on behalf of Contaminated Land  
**Sent:** 10 April 2023 16:26  
**To:** Planning Online  
**Subject:** RE: Consultation for Ref No ENQ/2023/0275

**ENQ/2023/0275 EIA Screening/Scoping Opinion for Onshore Aspect of Salamander Offshore Wind Farm Project for Erection of 7 Offshore Wind Turbines and Associated Land Based Infrastructure at Salamander Offshore Wind Farm, 35 Km East Of Peterhead, Aberdeenshire**

**Environmental Protection Act 1990: Part IIA Contaminated Land**

Thank you for consulting us on this EIA screening/scoping opinion,

In respect of contaminated land, I have reviewed chapter 10 of the report: *Salamander Offshore Wind Farm Environmental Impact Assessment Scoping Report*, revision 01, dated 21<sup>st</sup> February 2023, prepared by Simply Blue Energy (Scotland) Ltd.

The report describes no contaminated land in the onshore scoping area (section 10.1.5.4). However, the northern part of the onshore scoping area includes part of a closed landfill (North Kirkton) and an area subject to historical gravel extraction.

Therefore, in response to the scoping questions in section 10.1.10 (my numbering of the questions in the order presented);

1. I do not agree that all legislation' policy and guidance documents have been identified. No contaminated land legislation or guidance has been included.
2. Yes.
3. Additional data sources; historic mapping and Aberdeenshire Council in respect of potential contaminated sites within the site boundary.
4. Yes.
5. Yes.
6. The impact of contaminated land will be dependent on the location of onshore structures and works. On the basis of the presented information with it's lack of detail of onshore layout, it cannot be stated whether or not the scoping out of contaminated land as a risk/impact factor is applicable.
7. No comment.
8. Yes, if appropriately modified in respect of above comments.

I have no further comment to make on this enquiry.

Regards,

Peter.

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Peter Exon  
Assistant Scientific Officer

Aberdeenshire Council,  
Environment and Infrastructure Services,  
**Environmental Health**,  
Gordon House,  
Blackhall Road,

Inverurie, AB51 3WA

[Redacted]

-----Original Message-----

From: [planning@aberdeenshire.gov.uk](mailto:planning@aberdeenshire.gov.uk) [planning@aberdeenshire.gov.uk](mailto:planning@aberdeenshire.gov.uk)

Sent: 27 March 2023 09:05

To: Contaminated Land [contaminated.land@aberdeenshire.gov.uk](mailto:contaminated.land@aberdeenshire.gov.uk)

Subject: Consultation for Ref No ENQ/2023/0275

Please find attached important correspondence from Aberdeenshire Council, Planning and Economy Service.

## ENVIRONMENT RESPONSE TO DEVELOPMENT MANAGEMENT CONSULTATION

|                               |   |
|-------------------------------|---|
| <b>Planning Reference No:</b> | ENQ/2023/0275   |
| <b>Proposal:</b>              | EIA Screening/Scoping Opinion for Onshore Aspect of Salamander Offshore Wind Farm Project for Erection of 7 Offshore Wind Turbines and Associated Land Based Infrastructure |
| <b>Address:</b>               | Salamander Offshore Wind Farm, 35 Km East of Peterhead  |
| <b>D.M. Officer:</b>          | James Hewitt  |
| <b>Environment Officer:</b>   | Eleanor Munro (Natural Heritage)  |
| <b>Date of Response:</b>      | 26 <sup>th</sup> April 2023   |

|           |                              |  |
|-----------|------------------------------|--|
| <b>1.</b> | <b>Issue:</b>                | EIA Screening – Terrestrial Ecology/Ornithology  |
|           | <b>Actions:</b>              |  |
|           | a)                           | n/a – proposals within scoping report are acceptable.  |
|           |                              |  |
|           | <b>Policy Justification:</b> |  |
|           |                              |  |
|           | <b>Discussion:</b>           |  |
|           |                              | <p>The proposed range of ecological surveys is comprehensive and covers the features that are potentially present within the study area. A range of embedded mitigation measures have also been identified.</p> <p>There is no objection to wildcat being scoped out at this stage as this is not considered to be suitable habitat for wildcat.</p> <p>The potential project impacts for terrestrial ecology and ornithology that have been scoped into the EIA and the proposed approach to the assessment are acceptable.</p> |

|           |                              |  |
|-----------|------------------------------|--|
| <b>2.</b> | <b>Issue:</b>                | Access / Recreation  |
|           | <b>Actions:</b>              |  |
|           | a)                           | n/a – will be considered within EIA  |
|           |                              |  |
|           | <b>Policy Justification:</b> |  |
|           |                              |  |
|           | <b>Discussion:</b>           |  |
|           |                              | <p>There are a number of core paths and rights of way within the search area, including the coastal path, however this has been acknowledged within the scoping report and will be considered within the EIA. The production of an access plan has been included within the proposed embedded mitigation measures.</p> |

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**From:** Nick Rae  
**Sent:** 29 March 2023 12:10  
**To:** Planning Online  
**Cc:** James Hewitt  
**Subject:** Consultee Response for Planning Reference ENQ/2023/0275

**Consultee:** Flood Risk & Coast Protection  
**Planning Reference:** ENQ/2023/0275  
**Planning Case Officer:** James Hewitt

**Proposal:** EIA Screening/Scoping Opinion for Onshore Aspect of Salamander Offshore Wind Farm Project for Erection of 7 Offshore Wind Turbines and Associated Land Based Infrastructure  
**Address:** Salamander Offshore Wind Farm, 35km East of, Peterhead, Aberdeenshire  
**Grid Reference:** 411321.849957

Thank you for consulting *Flood Risk & Coast Protection* on this enquiry relating to EIA screening/scoping opinion.

It is noted that we have previously engaged with the applicant on this matter prior to the submission of the scoping report.

The items highlighted and proposed EIA approach set out within the scoping report generally capture our expectations.

We have no further comments at this stage.

Regards,

Flood Risk & Coast Protection  
Environment & Infrastructure Services



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E-mail: [flooding@aberdeenshire.gov.uk](mailto:flooding@aberdeenshire.gov.uk)  
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[www.aberdeenshire.gov.uk](http://www.aberdeenshire.gov.uk)

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**From:** Ian Murdoch  
**Sent:** 03 April 2023 11:19  
**To:** James Hewitt  
**Cc:** Planning Online  
**Subject:** ENQ/2023/0275: EIA Screening/Scoping Opinion - Onshore Aspect of Salamander Offshore Wind Farm Project for Erection of 7 Offshore Wind Turbines and Associated Land Based Infrastructure

Good morning James,

Please see below Roads Development's comments in respect of the EIA Screening/Scoping Opinion for the above proposal.

We note that the onshore scoping area covered under this enquiry is located to the east of the A90, south of St.Fergus.

In the scoping report, Section 12.4 covers Traffic and Transport.

With no locations identified yet for construction compounds etc along the route, we cannot provide comments for specific locations as yet.

The level of traffic and transportation generation of this proposal will be mainly confined to the construction stage, and therefore from the traffic and transport position we do not require further assessment within an EA and localised impacts of the scheme can be addressed through the normal planning application process. At that stage, Roads Development would require more information including the extents of any development and the traffic management plan identifying the types of vehicle proposed, any extra ordinary vehicles (length, height and weight) and the proposed routing of the delivery vehicles. We would also be able to identify any possible mitigation measures on the road network.

I hope the above is of some assistance, but please let me know if you wish to discuss further.

Kind Regards,

Ian Murdoch  
Roads Development Engineer  
Roads Development and Transportation  
Infrastructure Services  
Aberdeenshire Council

[Redacted]

Email: [ian.murdoch@aberdeenshire.gov.uk](mailto:ian.murdoch@aberdeenshire.gov.uk)

Angus Council

**From:** [Stephanie G Porter](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** RE: SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 15 April 2023 OUR REF: 23/00138/PREAPP  
**Date:** 23 March 2023 08:46:33

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Dear Sir/Madam,

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36  
APPLICATION AND MARINE LICENCES FOR THE SALAMANDER OFFSHORE  
WIND FARM LOCATED 35 KILOMETRES EAST OFF THE COAST OF  
PETERHEAD**

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS  
(ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007**

I refer to the above consultation and having reviewed the submitted information, as the development lies some distance from Angus, Angus Council has no comment to make in this case.

Yours sincerely,

**Stephanie Porter** | Team Leader – Development Standards | Planning & Sustainable Growth | Angus Council | Angus House | Orchardbank Business Park, Forfar, DD8 1AN | (01307 492378)

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[Redacted]

# Dee District Salmon Fishery Board



# Dee District Salmon Fishery Board

Marine Licensing and Consenting Casework Officer  
Marine Planning & Policy  
Scottish Government  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

By email to [MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot)  
28<sup>th</sup> April 2023

Dear Sirs,

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION AND MARINE LICENCES FOR THE SALAMANDER OFFSHORE WIND FARM LOCATED 35 KILOMETRES EAST OFF THE COAST OF PETERHEAD

On behalf of the Dee District Salmon Fishery Board (Dee DSFB) we welcome the opportunity to respond to the Ossian Offshore Wind Farm Limited - Consultation on Request for Scoping Opinion.

***Designations & Conservation Status***

As a statutory body charged with the protection of Atlantic salmon and sea trout stocks within its district, the Dee DSFB has a duty to ensure that there are no significant adverse impacts upon the populations of these species.

The Dee has been designated as a Special Area of Conservation under the EC Habitats Directive 92/43 EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna for Atlantic salmon (the principal species for which it receives this designation). The Dee District also supports populations of trout, eels and brook, river and sea lampreys.

Sea trout, common to all the rivers within the Dee District, are a priority species under the United Kingdom's Biodiversity Action Plan (UKBAP).

All lamprey species are protected under the EC Habitats Directive whilst river and sea lampreys are additionally protected under the UKBAP priority list.

Eels are a UKBAP priority species, critically endangered under the IUCN red list and protected under CITES.

## ***Wild Salmon Strategy and Conservation regulations***

In January 2022, the Scottish Government released its Wild Salmon Strategy which gave a clear message that there is sadly now unequivocal evidence that populations of Atlantic salmon are at crisis point. The Strategy calls on government agencies, as well as the private sector, to prioritise the protection and recovery of Scotland's wild Atlantic salmon populations.

One of the key pressures identified in the strategy is marine development, with marine renewables highlighted as having the potential to impact salmon through noise, water quality and effects on electromagnetic fields (EMFs) used by salmon for migration.

Furthermore, the Conservation of Salmon (Scotland) Regulations 2016 has led to the production of stock assessments for all Scottish salmon rivers, based on catch data. The assessments estimate whether the number of adults returning to the river in each of the previous five years will produce enough eggs to keep the population size above a critical threshold.

For the Dee, like other north-east rivers, the assessments have shown a declining trend in catches since 2011. Nonetheless, the Dee has been categorised as a Grade 1 river, meaning that the stocks have most likely been above the critical threshold - the Conservation Limit - over the last five years. It is however apparent that specific stock components, such as the Spring salmon stock on the Dee are critically low.

Assessment of the juvenile salmon stocks in the Dee through the National Electrofishing Programme for Scotland (NEPS) has evaluated juvenile stocks in the Dee as Grade 2, suggesting that there are significant issues with recruitment and survival within the catchment (Malcolm *et al* 2020). With greater pressures on marine survival such that only approximately 3% of smolts return to the river as adults, we need to address any pressures within the freshwater and marine environments to protect Dee salmon stocks.

### **Position**

The Dee DSFB welcomes the opportunity to respond to the scoping opinion and would wish to be consulted further during this process with specific interest in the migratory fish species Atlantic Salmon and sea trout.

We note that the location of the proposed site, cable corridor and landfall are out with the Dee District Salmon Fishery Board district and that the Dee SAC 48 km south-west of the Offshore ECC and 70 km from the Offshore Array Area. Due to the diadromous nature of Atlantic salmon and sea trout we are pleased to see that these migratory fish and their complicated migratory pathways have been considered and agree with potential impacts 'scoped in' to the assessment as identified Table 8.8.

We also welcome the provision for a separate stand-alone receptor group for diadromous fish within the EIAR as noted in section 8.2.10.1.

We welcome the addition of a section on potential cumulative impacts of the development given its proximity to neighbouring developments. We would recommend as we have done for previous developments that further consultation takes place with Marine Scotland Science and Fisheries Management Scotland with reference to broadening our understanding of any potential impact upon diadromous fish because of this proposed development. Specifically feeding into the ScotMER Diadromous Fish Specialist Receptor Group where a series of evidence gaps have been identified in relation to diadromous fish.

Yours sincerely

[Redacted]

Jamie Urquhart

Fisheries Protection Manager, Dee District Salmon Fishery Board

Department of Agriculture and Rural Development of  
Northern Ireland



## **Salamander Offshore Wind Farm - Consultation on HRA Screening Report**

### **Marine Conservation Advice Response**

DAERA Marine and Fisheries Division is content that the proposal is unlikely to have a significant effect on marine SACs within the Northern Ireland inshore region due to distance from the wind farm site. With regard to SPA features, NIEA is content that the Salamander Offshore Windfarm HRA Stage 1: Screening report has screened in breeding Fulmar at Rathlin Island SPA (*Table 6.4: Sites and Features where potential for LSE exists for Offshore and Intertidal Ornithology*) and that breeding Manx Shearwater at Copeland Islands SPA was removed from further consideration due to their findings of:

1. no potential for LSE for any SPAs with which potential connectivity was identified for Manx shearwater at all SPAs and Ramsar sites for all aspects of the Offshore Array Area and,
2. no connectivity with the Offshore Array Area and therefore no LSE for Manx Shearwater at breeding colonies, including at the Copelands Islands SPA, after considering existing Manx Shearwater tracking data.

### **Marine Strategy Branch Response**

#### **Bathing & Shellfish Water Protected Areas**

The location of these planned developments are such that any negative impact to Northern Ireland's Shellfish Water Protected Areas or Bathing Waters are extremely unlikely.

#### **Marine Strategy – Good Environmental Status**

The location of these planned developments are such that any negative impact to the achievement of Good Environmental Status in Northern Ireland waters is extremely unlikely.

# Edinburgh Airport

**From:** [Safe Guarding](#)  
**To:** [MS Marine Renewables](#)  
**Cc:** [Safe Guarding](#)  
**Subject:** Scoping Opinion - Salamander Offshore Wind Farm  
**Date:** 24 March 2023 14:41:12  
**Attachments:** [image001.png](#)

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Good afternoon,

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

With best regards,  
Claire

**Claire Brown**  
Aerodrome Safeguarding & Compliance Officer



  
**Our values**

t: +44 (0)131 344 3845 [Redacted]  
[www.edinburghairport.com](http://www.edinburghairport.com)

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

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# Glasgow Airport

**From:** [#GLA Safeguarding](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** RE: SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 15 April 2023  
**Date:** 14 April 2023 12:12:53  
**Attachments:** [image855492.png](#)  
[image626298.png](#)  
[image461380.png](#)  
[image788202.png](#)  
[image292987.png](#)  
[image864269.png](#)  
[image671144.png](#)  
[image072439.png](#)  
[image783667.png](#)  
[image268308.png](#)

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This proposal is located outwith the consultation zone for Glasgow Airport. As such we have no comment to make and need not be consulted further.

Kind regards

Kirsteen



**#GLA Safeguarding**  
**#GLA Safeguarding**

 [Redacted]  
 [glasafeguard@glasgowairport.com](mailto:glasafeguard@glasgowairport.com)  
 [www.glasgowairport.com](http://www.glasgowairport.com)

 Glasgow Airport, Erskine Court, St Andrews Drive, Paisley, PA3 2TJ

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[Redacted]

# Glasgow Prestwick Airport

**From:** [Ian Hutchinson](#)  
**To:** [MS Marine Renewables](#)  
**Cc:** [Safeguarding](#)  
**Subject:** SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response  
Required by 15 April 2023  
**Date:** 20 March 2023 14:16:04

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Good Afternoon,

On behalf of Glasgow Prestwick Airport (GPA), I have reviewed the Marine Scotland Scoping Report with regards to the Section 36 planning application for Salamander Offshore Wind Farm.

The proposed development lies outside the GPA safeguarding area and as such we would have no comment or reasonable objection to make.

Kind regards,

Ian

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Logo



Glasgow Prestwick Airport  
Ltd.  
Aviation House  
Prestwick  
KA9 2PL  
Scotland  
United Kingdom

Ian Hutchinson  
Safeguarding Manager

T: (+44) 01292 511038  
M:

[ihutchinson@glasgowprestwick.com](mailto:ihutchinson@glasgowprestwick.com)

[www.glasgowprestwick.com](http://www.glasgowprestwick.com)

[Redacted]

Green Volt Offshore Windfarm Ltd





13 April 2023

Emma Lees  
Marine Scotland Licensing Operations Team,  
Marine Scotland,  
Marine Laboratory,  
375 Victoria Road,  
Aberdeen AB11 9DB

Dear Ms Lees

**Regulation 14 of The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017**  
**Regulation 13 and Schedule 4 of The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2007**  
**Regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017**  
**(collectively referred to as the “EIA Regulations”)**

**SCOP-0021 - Salamander Offshore Wind Farm – Simply Blue Energy (Scotland) Ltd**

Thank you for consulting Green Volt Offshore Windfarm Limited on the scoping report submitted in respect of the proposed section 36 application and marine licence applications for the Salamander Offshore Wind Farm by Simply Blue Energy (Scotland) Ltd.

Green Volt Offshore Windfarm Limited has been formed by Flotation Energy Ltd (Flotation Energy) and Vårgrønn AS (Vårgrønn), the developers of the Green Volt Offshore Windfarm ('Green Volt'). Flotation Energy is an offshore wind development company, headquartered in Edinburgh, UK. Founded in 2018, the company is pioneering the deployment of both floating and fixed offshore wind in Scotland, the UK and Internationally. Vårgrønn is a growing agile offshore wind company and established as a joint venture between Italian energy major Eni Plenitude and the Norwegian private equity manager and offshore energy serial entrepreneur HitecVision.

**Salamander Offshore Wind Farm is located approximately 33 km from the Green Volt windfarm site** and <1 km from the offshore export cable route. The project applicant is aware that the **section 36 and marine licence applications for the Green Volt Offshore Windfarm were submitted to MS-LOT on 20 January 2023** as they have submitted a response to the MS-LOT consultation on these. Given the proximity of the two projects Green Volt will look to communicate with the applicant directly and through the Peterhead Developers Group, as appropriate. However, the Green Volt applications and other project information are available on the [Green Volt website](#) and [Marine Scotland's website](#).

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## Offshore Aspects

In addition to the Green Volt offshore export cable route being <1 km from the Salamander Offshore Wind Farm site, the two projects have identified a similar landfall location. Green Volt's primary option (St Fergus South) is in the vicinity of the Salamander project proposed landfall at Scotstown Beach between Lunderton and Kirkton. Therefore, there is the potential for interactions between the two project's offshore export cable corridors, including possible cable crossings.

Based on these potential interactions with Green Volt, we would anticipate that the offshore EIA for the proposed Salamander Offshore Wind Farm would consider the following:

- impacts on the offshore elements of the Green Volt Offshore Windfarm project, including:
  - Windfarm site;
  - Offshore export corridor between the offshore substation to the landfall, particular the St Fergus South (north of Peterhead) primary option.
  - Increased vessel traffic and from the physical presence of Salamander infrastructure that may lead to interactions with activities related to Green Volt.

**Green Volt has an operational target date of 2027** and should be included in any cumulative assessments.

## Onshore Aspects

We note that the Salamander Offshore Wind Farm proposed landfall at Scotstown Beach between Lunderton and Kirkton has a potential for interactions with the primary landfall option for Green Volt (St Fergus South) and the onshore export cable route towards New Deer.

**Green Volt has been offered a grid connection at New Deer**, subject to assessment by NGESO through the Holistic Network Design (HND) process. The scoping report for the onshore elements of the Green Volt Offshore Windfarm has been submitted to Aberdeenshire Council and is available on the [Green Volt website](#), with submission of the onshore application and Onshore EIA Report for Green Volt planned for early summer 2023.

We understand that the proposed Salamander Offshore Wind Farm has identified an onshore scoping area for the location of both the Onshore Substation and Onshore Export Cable Corridor, but the site selection process is ongoing and further refinements will occur. It is noted that the connection between the onshore substation and the grid will be undertaken by the network operator and will not form part of the EIA Report.

13 April 2023

Given the potential for both the Salamander and Green Volt projects to have onshore works in the St Fergus South/Scotstown Beach area, we would anticipate that the onshore EIA would consider the following:

- Direct impacts on the onshore elements of the Green Volt, including landfall works, such as the Horizontal Directional Drilling (HDD) compound, and the onshore export cable route to New Deer.

We would welcome ongoing engagement with the Salamander team throughout the EIA process, and particularly on the outcomes of any cumulative impact assessment undertaken by them. The Green Volt team can be contacted at [hello@greenvoltoffshorewind.com](mailto:hello@greenvoltoffshorewind.com).

Yours sincerely,

[Redacted]

Victoria Crossland  
Consent Lead, Green Volt Offshore Windfarm Ltd

## Health and Safety Executive

**From:** [LUP enquiries](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 15 April 2023 - FAO Emma Lees  
**Date:** 21 March 2023 10:44:06

---

Dear Emma,

Thank you for your email to HSE asking for comments on the EIA Scoping Opinion for the proposed offshore windfarm at Peterhead.

I am responding on behalf of HSE's Land Use Planning (LUP) advice team on the onshore parts of the proposals (including onshore substation and energy balancing infrastructure).

Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, Regulation 4(4) – the vulnerability of the proposed development to major accidents relevant to the development

- HSE's response is limited to our role in the land use planning system for the control of major industrial hazards involving hazardous substances.
- HSE is not responding in our regulatory role in the health and safety system

1. The proposed development, being a substation and energy balancing infrastructure for an offshore windfarm, does not appear to be of a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015.

2. The development is not located within a safeguarding zone of an explosives site licensed under the Explosives Regulations 2014 or the Dangerous Goods in Harbour Area Regulations 2016.

3. The development is not located within HSE's land-use-planning consultation zones for hazardous substances consented sites.

4. The proposed development is located within HSE's land-use-planning consultation zones for two major accident hazard pipelines:

- the BP St Fergus to Cruden Bay NGL pipeline (HSE ref 6893) , and
- the St Fergus to Peterhead power station pipeline (HSE ref 7098)

There is potential to initiate a major accident at the major accident hazard pipelines, for example during the development construction phase and potentially the operational phase, because the development area intersects the route of the major accident hazard pipelines.

HSE suggests that the EIA should show that the operator of the two pipelines, BP Exploration Operating Co Ltd, has been consulted regarding the following issues or that these issues have been considered in the assessment:

- the development restricted area due to the pipeline
- ensuring the integrity of the pipeline and protecting the pipeline from development and operational works.

We hope that this takes your assessment forward

Yours sincerely

Richard Lomax

Land Use Planning Advice team

Chemicals Explosives Microbiological Hazards Division 5B



Redgrave Court, Merton Road, Bootle, Merseyside, L20 7HS

Please send enquiries on Land Use Planning to [lupenquiries@hse.gov.uk](mailto:lupenquiries@hse.gov.uk)

HSE's Land Use Planning web app is at <https://pa.hsl.gov.uk/>

Please note that aspects of this service may incur a fee for business users.

[Redacted]

Highlands and Islands Airports Limited

**From:** [Safeguarding](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** RE: SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 15 April 2023  
**Date:** 06 April 2023 10:10:00

---

**Your Ref: SCOP-0021**  
**Our Ref: 2023/100/INV**

Dear Sir/Madam,

**Proposal: REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION  
AND MARINE LICENCES FOR THE SALAMANDER OFFSHORE WIND FARM  
Location: 35 KILOMETRES EAST OFF THE COAST OF PETERHEAD**

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This proposal is located out-with our safeguarding consultation zone. As such we have no comment to make and need not be consulted further.

Kind regards,

Nyree

**Nyree Millar-Bell**

**Aerodrome Safeguarding and Operational Support Officer  
Highlands and Islands Airports Limited**

✉ [NBell@hial.co.uk](mailto:NBell@hial.co.uk) 🌐 Visit our Website at [www.hial.co.uk](http://www.hial.co.uk)

[Redacted]



# Historic Environment Scotland



HISTORIC  
ENVIRONMENT  
SCOTLAND

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EACHDRAIDHEIL  
ALBA

**By email to:**

[MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot)

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

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131-668-8716  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our case ID: 300061529  
Your ref: SCOP-0021  
15 May 2023

Dear Marine Scotland

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION  
AND MARINE LICENCES FOR THE SALAMANDER OFFSHORE WIND FARM  
LOCATED 35 KILOMETRES EAST OFF THE COAST OF PETERHEAD  
(OFFSHORE DEVELOPMENT AREA)**

Thank you for your consultation which we received on 16 March 2023 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

**Proposed Development**

We understand that the project comprises an Offshore Development Area and an Onshore Development part. The Offshore Development Area consists of the Offshore Array Area c. 35km E of Peterhead, which includes a maximum of 7 wind turbine generators (WTGs) (of up to a maximum blade tip height of 315m) having an installed capacity of up to 100MW, floating substructures to support the WTGs, mooring and anchoring systems connecting the floating substructures to the seabed, inter-array cables, connection hub(s)/joint(s) on the seabed and any associated foundations, as well as the Export Cable Corridor making landfall c. 2.5km N of Peterhead. The Onshore Development consists of the Landfall, Onshore Export Cable and the Onshore Substation (OnSS).

For clarity purpose, our following comments responds to scoping report regarding the Offshore Development Area only. Our comments on the scoping report regarding the Onshore Development have also been provided to you under separate cover.

**Scope of assessment**

We note that the Environmental Impact Assessment for this project is adopting a design envelope approach, and exact details of the location and configuration of turbines and associated development, floating foundation type, mooring system, inter-array cable layout, exact turbine hub height, cable type and cable route are currently unknown. The

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Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



scoping report stated that to avoid excessive conservatism, the parameters considered throughout are not necessarily a combination of the maximum design parameters for each. We are content that this is an appropriate approach to the assessment for this project.

In terms of marine archaeology, we note that there has been a substantive review of historic environment baseline data from appropriate sources and are content that this is sufficient to underpin the forthcoming assessment. We consider the proposed methodologies relating to gathering of geophysical and hydrological data, and to the assessment of potential direct impacts, to be appropriate. We welcome the proposal to ensure that appropriate mitigation, which can include the recommendation for implementation of Archaeological Exclusion Zones (AEZ), is embedded into the scheme as secured by consent conditions via a Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD).

We note that impact on setting is described as an indirect impact in the EIA scoping report. For the purposes of EIAs, indirect impact applies to indirect physical impact only, and setting impact should be considered separately. Setting impacts are generally direct and result from the proposal causing change within the setting of the heritage asset that affects its cultural significance or the way in which it is understood, appreciated and experienced. We would refer the applicant to the discussion of direct, indirect and setting impacts in the cultural heritage appendix of the [EIA Handbook](#) (page 182).

#### Direct impacts

There is no designated heritage asset within the Offshore Development Area. However, we welcome the applicant's proposal to assess the potential direct impacts on marine archaeology, including both temporary and long-term effects.

#### Indirect impacts

We note the applicant has proposed to scope out impacts on known historic environment assets outwith the Offshore Development Area. We do not support this as potential indirect physical impacts on known assets outwith the Offshore Development Area should be considered.

#### Setting impacts

We welcome the applicant's proposal to assess the setting impacts on marine archaeology and key onshore assets, including both temporary and long-term effects. The applicant has indicated the assessment on setting impacts will cover 40km within the boundary of the Offshore Array Area and within the Zone of Theoretical Visibility (ZTV). This 40km radius will extend c. 5km inland from the coast. However, this may not be sufficient. We recommend use of a bare earth ZTV analysis to identify assets which may be impacted in the first instance, including but not limited to scheduled monuments, category A listed buildings and inventory gardens and designed landscapes.



In regards the specific designated assets on which their setting impacts should be assessed, we note that a number of scheduled monuments have been identified for assessment of setting impacts generated from the Onshore Development, that being St Fergus's Church (SM5622), Castle Hill, motte south-west of Hallmoss Farm (SM3259), Inverugie Castle (SM98), Ravenscraig Castle (SM2496), Rattray Line, pill box 80m E of Annachie Bridge (SM11315), Rattray Line, pill box 960m NNW of Annachie Bridge (SM11314) and Rattray Line, pill box 1550m SSE of Home Farm (SM11320). We would recommend them, together with Mount Pleasant, enclosure (SM3999), to be assessed also against the potential setting impacts generated from the Offshore Development Area. It is possible that once a ZTV has been prepared, additional assets in our remit may need to be assessed.

When considering impact on setting, we recommend the use of wireframe visualisations. Where initial assessment identifies potential significant impacts on an asset, photomontages should be prepared to help analyse and illustrate these impacts. We would be happy to discuss this in more detail with the applications as the EIA proceeds.

#### Cumulative and Transboundary Impacts

We also note the potential for cumulative impacts on the setting of terrestrial heritage assets caused by the development of this project in combination with other existing and proposed offshore wind farms in the area. In this case, we would also recommend that cumulative impacts are carefully considered. We welcome the stated intention to consider cumulative effects on setting from other relevant projects as defined in chapter 6.4 of the EIA scoping report, as part of the assessment process.

Having considered the location of this project, we are also content with the scoping out of transboundary impacts upon the marine historic environment due to construction, operation and maintenance, and decommissioning of the project.

#### **Further information**

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at [www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes](http://www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes). Technical advice is available on our Technical Conservation website at <https://conservation.historic-scotland.gov.uk/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Adrian Lee and they can be contacted by phone on 07500 579626 or by email on [adrian.lee@hes.scot](mailto:adrian.lee@hes.scot).

Yours faithfully

#### **Historic Environment Scotland**

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



**By email to:**  
[MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot)

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

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131-668-8716  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our case ID: 300065055  
Your ref: SCOP-0021  
15 May 2023

Dear Marine Scotland

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION  
AND MARINE LICENCES FOR THE SALAMANDER OFFSHORE WIND FARM  
LOCATED 35 KILOMETRES EAST OFF THE COAST OF PETERHEAD  
(ONSHORE DEVELOPMENT)**

Thank you for your consultation which we received on 16 March 2023 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

**Proposed Development**

We understand that the project comprises an Offshore Development Area and an Onshore Development part. The Offshore Development Area consists of the Offshore Array Area c. 35km E of Peterhead (which includes amongst other components a maximum of 7 wind turbine generators having an installed capacity of up to 100MW) and the Export Cable Corridor making landfall c. 2.5km N of Peterhead. The Onshore Development consists of the Landfall, Onshore Export Cable and the Onshore Substation (OnSS). We note that the cables will be buried in trenches. According to an overview provided by the applicant (Figure 4-11), a typical OnSS includes substation building(s) and energy balancing infrastructure (up to maximum height of 20m), as well as switchyard equipment (up to a maximum height of 25m).



For clarity purpose, our following comments responds to scoping report regarding the Onshore Development only. Our comments on the scoping report regarding the Offshore Development Area have also been provided to you under separate cover.

## **General comments**

We consider that there is a potential for significant impact on the setting of a number of assets in our remit. We therefore recommend that careful consideration is given to reducing and avoiding both indirect physical impacts and impacts on the setting of heritage assets during the design process. This should be informed by a robust environmental assessment including relevant supporting Zone of Theoretical Visibility (ZTV) analysis and visualisations. We would welcome further discussion on the design of the proposals and the location of supporting visualisations as this assessment work is progressed.

## **Scope of assessment**

We note that the Environmental Impact Assessment for this project is adopting a design envelope approach, and exact details of the cable route and the location of the OnSS are currently unknown. The scoping report stated that to avoid excessive conservatism, the parameters considered throughout are not necessarily a combination of the maximum design parameters for each. We are content that this is an appropriate approach to the assessment for this project.

We note that impact on setting is described as an indirect impact in the EIA scoping report. For the purposes of EIAs, indirect impact applies to indirect physical impact only, and setting impact should be considered separately. Setting impacts are generally direct and result from the proposal causing change within the setting of the heritage asset that affects its cultural significance or the way in which it is understood, appreciated and experienced. We would refer the applicant to the discussion of direct, indirect and setting impacts in the cultural heritage appendix of the [EIA Handbook](#) (page 182).

### Direct impacts

There is no designated heritage asset within the Onshore Development as indicated at this stage. However, we welcome the applicant's proposal to scope in the direct impact of the Onshore Development on known cultural heritage assets during the construction and decommissioning phases as well as the operation and maintenance phases.

### Indirect impacts

We would like to highlight the potential for indirect physical impacts to St Fergus' Church, old parish church (SM5622) should cables make landfall in the vicinity. Although the cable route is proposed to avoid the monument, detailed consideration should be given to potential indirect physical impacts, such as vibration from cable laying, on the monument.



### Setting impacts

The applicant has proposed to scope in the setting impacts of the OnSS during the operation and maintenance phases, but scope out those in the construction and decommissioning phases. While we are broadly content with this approach, we do not consider that a 3km Study Area is adequate for identifying assets potentially subject to change to setting. Given uncertainties regarding the scale and position of elements of the proposal, and the potential to have structures as tall as 25m in the Onshore Development, we recommend use of a bare earth ZTV analysis to identify assets which may be impacted in the first instance, including but not limited to scheduled monuments, category A listed buildings and inventory gardens and designed landscapes.

In regards the specific designated assets on which their setting impacts should be assessed, we note that a number of scheduled monuments have been identified for assessment of setting impacts generated from the Onshore Development, that being St Fergus's Church (SM5622), Castle Hill, motte south-west of Hallmoss Farm (SM3259), Inverugie Castle (SM98), Ravenscraig Castle (SM2496), Rattray Line, pill box 80m E of Annachie Bridge (SM11315), Rattray Line, pill box 960m NNW of Annachie Bridge (SM11314) and Rattray Line, pill box 1550m SSE of Home Farm (SM11320). We would recommend Mount Pleasant, enclosure (SM3999), to be assessed also against the potential setting impacts generated from the Onshore Development. It is possible that once a worst-case scenario ZTV has been developed, additional assets in our remit may need to be assessed.

When considering impact on setting, we recommend the use of wireframe visualisations. Where initial assessment identifies potential significant impacts on an asset, photomontages should be prepared to help analyse and illustrate these impacts. We would be happy to discuss this in more detail with the applications as the EIA proceeds.

### Cumulative Impacts

We welcome the stated intention to consider cumulative effects on setting from other relevant developments as defined in chapter 6.4 of the EIA scoping report, as part of the assessment process. However, we note in chapter 12.1.8 of the scoping report that only Kirkton Solar Farm is highlighted for assessment of cumulative impacts. We recommend clarification that the approach described in 6.4 is also to be adopted for the Onshore Development.

Please note that, because of the lack of detail at this stage of the consultation for the location, scale and design of the Onshore Development, we are currently unable to provide detailed historic environment comments on this project. Further consultation with us is encouraged once the final Onshore Development location and ZTV have been established by the applicant.



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### **Further information**

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We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Adrian Lee and they can be contacted by phone on [Redacted] or by email on [adrian.lee@hes.scot](mailto:adrian.lee@hes.scot).

Yours faithfully

**Historic Environment Scotland**



# Marine Analytical Unit

## Salamander Offshore Wind Farm Scoping Report

### **Marine Analytical Unit Response**

The Salamander Offshore Wind Farm scoping report includes descriptions of a range of potential impacts. This response focuses only on the assessment of social and economic impacts.

We recommend that a full Socio-Economic Impact Assessment be scoped into the Environmental Impact Assessment. We provide general advice on how to deliver this at Annex 1.

### **Overview**

Impacts on employment in the supply chain, economic output, access to job opportunities for the local population, demand for housing and local services, and tourism and recreation have been scoped in for all phases of the development. Socio-cultural effects and distributional impacts have been scoped out.

### **Baseline analysis**

The scoping report includes a review of the baseline characteristics of the area under study. We recommend that the most up-to-date data is used for all analysis. For example, the 2018 Scotland's Marine Economic Statistics is referenced in the scoping report but more recent versions of this publication are available and should be used instead (see here: [Marine economic statistics - gov.scot \(www.gov.scot\)](http://www.gov.scot/publications/marine-economic-statistics-2018/pages/introduction.aspx)).

### **Socio-cultural effects**

Socio-cultural effects are defined as "any potential impacts on lifestyle, family structure, social problems (such as crime deprivation), human rights, community character etc.". These impacts are not discussed anywhere else in the report, and have been scoped out because the development is offshore and so these impacts are assumed to be minimal. We do not feel that there is enough evidence presented in the report to justify this assumption. The other impacts scoped in, such as employment, demand for housing and local services, and tourism and recreation, could all generate socio-cultural effects. The impacts scoped in to other chapters in the human environment section (cultural heritage, commercial fishing, visual impacts) could, similarly, generate socio-cultural effects. It may be helpful to use SIMD data as a baseline for these impacts, and other social impacts, where relevant.

### **Economic Impacts**

We broadly agree with the scoping report's proposed indicators for assessing economic impacts, including years of employment, GVA, type and number of jobs created etc. The assessment should include direct, indirect and induced impacts and take account of deadweight, leakage, displacement and substitution. Sensitivity analysis to account for risk, uncertainty and optimism bias should also be considered. Please see Annex 1 for more advice.

We expect to see a detailed description of the methodology used to assess economic impacts in the EIA, including specific details about the methodological approach taken and any key assumptions that underpin any estimates. This may be supplied in a technical annex if necessary.

### **Distributional Impacts**

Distributional impacts are defined as “the potential for the Project to impact specific groups within a society (including different age groups, religious groups and ethnic minorities) or communities which are defined by their geographic location.” These have been scoped out on the grounds that the project is offshore, and these impacts are considered to be unlikely. Again, we feel that there is not enough evidence presented in the scoping report to support this conclusion. The impacts scoped in could all have distributional impacts, as could the impacts scoped into other chapters, mentioned above. For example, it would be good to understand who is likely to benefit from potential employment opportunities.

We would, therefore, recommend that socio-cultural effects and distributional impacts are scoped in for all phases of the development i.e. Construction, Operation and Maintenance, and Decommissioning.

### **Onshore impacts**

The developers state that the socio-economic impacts of the offshore and onshore components have been considered together. This is positive, but does not seem to be fully reflected in the socio-economic chapter and the impacts considered.

In the onshore section of the report, impacts presented in the human environment chapter have largely been scoped in. These include impacts on Archaeology and Cultural Heritage, Onshore Air Quality, Landscape and Visual Amenity, Traffic and Transport, Noise and Vibration and Land Use and other users. Many of these have the potential to generate social impacts, including socio-cultural effects and distributional impacts. For example, it would be good to understand which areas will be affected by traffic and transport disruptions.

### **Engagement**

The engagement that has been carried out so far is fairly minimal and focuses on statutory consultees or key interest groups. Socio-economic impacts have not been the focus of the engagement so far.

The report states that there is more engagement planned, but there is little detail given about who will be engaged with, on what topics and in what way.

We would like to see a detailed plan of the future engagement activities. We would like socio-economic impacts to be the focus of some of this engagement. We would also recommend that these activities are designed in such a way that the information gathered during these activities can meaningfully inform the SEIA. For example this might mean ensuring that information gained is recorded accurately, that details of participants are recorded, and that efforts are made to engage with a range of people. We would

recommend appointing a community liaison officer to improve the engagement and communication with impacted communities.

### **Conclusions**

- We recommend that a full socio-economic impact assessment is scoped in, and that this should include socio-cultural effect, distributional impacts, and the knock on social impacts of impacts to other receptors such as commercial fisheries, cultural heritage and visual impacts.
- We recommend that knock on social impacts of impacts to the human environment identified in the onshore impact assessment are included in the socio-economic impacts assessment.
- We recommend producing a more detailed engagement plan, including who will be engaged with, on what topics, and in what way. We expect the outcome of these engagement activities to be included in future assessments.

We understand that at the point of applying for a license the developers may not know which ports or landfall locations they will use, nor where they will source their workforce from. Without this information it is difficult to plan primary research and provide a detailed assessment of social impacts. Nevertheless we expect transparency on what has the potential to significantly impact but which cannot be assessed fully due to a lack of sufficient detail.

## **Annex 1: General Advice for Socio-Economic Impact Assessment Marine Analytical Unit, December 2022**

This document sets out some suggestions for delivering socio-economic impact assessment drawing on the professional expertise of the Marine Analytical Unit.

### **Section 1. Some general best practice tips**

- Take a proportionate approach to SEIA in line with the size and generating capacity of the development
- Consider offshore and onshore components of the development in the same assessment.
- Employ experts to design and carry out the assessment. The relevant expertise would include:
  - Social research and economist training, qualifications and experience
  - Familiarity and experience with appropriate methods for each discipline (including economic appraisal, social research methods such as surveys, sampling, interviews, focus groups and participatory methods)
- Consider potential secondary socio-economic impacts of any changes that affect the other relevant receptor groups covered in the wider EIA e.g. commercial fisheries, cultural heritage and archaeology and visual impacts.
- Include consideration of the cumulative impact of multiple offshore developments.
- Outline the rationale for scoping out impacts that are deemed to be minimal, including any evidence or analysis that has been used. If this is not provided it can be difficult for MAU to understand why impacts have been scoped out and we may suggest scoping them back in.

### **Section 2. Key components of a Socio-economic Impact Assessment**

We set out below what we consider to be the key steps to an assessment. We recommend a combined approach so that social and economic impacts are covered together in the assessment, whilst acknowledging that different methodologies for social and economic impacts assessment are needed at certain stages, and that the two disciplines are distinct.

We wish to highlight the importance of stakeholder engagement throughout the assessment, and the use of social research methods to gather primary data and first hand perspectives from particular groups and communities that are affected. These are helpful in order to better understand the nature and degree of impacts that might be caused by changes that are expected occur. A change in itself may or may not bring about tangible impact, impacts may vary for different people or be perceived in different ways, are affected by individual values and attitudes, and conditioned by the context.

Stakeholder engagement and data collection can occur at a number of stages in the SEIA process and may involve similar methodologies but there are important differences to note. The primary aims of stakeholder engagement are to inform, consult or involve key stakeholders, and to communicate information and gather

feedback. Data collection, in contrast is a more rigorous analytical process involving:

- Setting out a planned methodology in advance with clear objectives of what you wish to achieve through data collection
- Sampling strategies that take account of the demographic variations in the population and the need to include difficult to reach groups
- Robust methods to collect information from people in a neutral and unbiased way
- Awareness of how data will be analysed and reported on to obtain and disseminate robust conclusions
- Taking account of research ethics including informed consent, and data protection requirements under GDPR

The stages below are divided into the activities that we suggest are **before** the developer submits a request for a scoping opinion and those that are done **after** the scoping phase. We recommend an iterative approach which means that steps inform each other, information is built up over time, and some steps may be repeated or done in a different order.

The key steps should include:

### **Pre-scoping activities**

- 1) **Getting started:** Employ economist and social research experts and work with them to develop a plan for the SEIA that sets out data requirements, and the proposed social and economic data collection and impact assessment methodologies, timescales, any data protection considerations, risk assessment and ethical issues that might arise from the work.
- 2) Develop a **detailed description** of the planned development and consider the project phases where socio-economic impacts might be experienced (covering development, construction, operation and maintenance and decommissioning phases). Start to map out potential socio-economic impacts and initial consideration of areas of impact on land that will need to be covered.
- 3) **Initial scoping of impacts:** develop a broad list of potential impacts informed by experts (including social researcher, economist, local representatives from key groups, community stakeholders and others).
- 4) **Define potential impact areas on land** taking into account locations and connections between activities. Different types of impacts may be experienced at different geographic levels, some in the area nearest the landfall or the nearest coastline to the development at sea, and others much further away (at Scotland level, UK level and internationally). The geographical scale at which social impacts are experienced may be different for social impacts compared with economic impacts. There may be multiple epicentres from which impacts radiate including the site of the development, land-based areas such as landfall and grid connections, construction bases and places from which the development is visible. Activities that take place in the sea are also relevant for defining the impact area on land, for example the location of fishing activity and ports where

fish are landed. The definition of the impact area will inform which communities and which sectors are included in the assessment and vice versa, so this exercise needs to be done iteratively with step 3, the initial scoping of impacts.

- 5) **Stakeholder mapping** is required to identify all the people, groups and stakeholders who may be affected by the development and is a first step in order to conduct effective stakeholder engagement. This exercise is informed by the definition of the impact area. A broad approach is recommended. Stakeholders are likely to include local communities, businesses, workers, other users of the sea, interest groups, community councils and so on.

**Steps 4 and 5 may lead to a change in the list of potential impacts so this will need refined/checked.**

- 6) **Stakeholder engagement (with those affected by the development, sea users, communities etc)** is a key requirement of SEIA that is done at different stages of the process. We recommend doing some initial stakeholder engagement before submitting the scoping report. Stakeholder engagement will fulfil a number of requirements:

- **Provide information about the development** so that those who might be affected are able to make an informed judgement about potential impacts
- **Present and refine list of potential impacts based on feedback** - identify impacts that are most relevant and add any additional ones that are identified
- **Collect initial data/ insights from stakeholders** on what potential socio-economic impacts (to be developed later)
- **Build relationships** with the community and key groups affected for later stages of the SEIA process so that they can understand the decisions making process and how they can influence it.

There are many **participatory methodologies** that can be used for effective stakeholder engagement that provide a deliberative space for community discussions.

This stage may also require the setting up of governance structures and a community liaison officer. **Early engagement** with those who might be affected is very important, as is meaningful and inclusive engagement where people feel that they are being listened to and that their feedback will be acted upon. It is important to set out clearly how stakeholder engagement is being done for the SEIA specifically.

- 7) **Gather contextual information** to develop a social and economic profile of the area prior to the development that will help with setting the baseline and impact prediction, identifying potential industries and communities that might be affected and sources of data that can be used in the assessment. This might include primary data collection using social research methods (such as surveys,

interviews, focus groups) as well as desk based analysis (of existing data sets such as fishing data, population data).

Primary data collection may occur alongside participatory activities (e.g. engagement events) but must be done in a rigorous and systematic fashion and the findings should be robustly analysed and incorporated into the SEIA. Impacts that are identified for the other receptors in the wider EIA may also have socio-economic consequences and so it may be important to include these in the SEIA.

#### **8) Produce list of anticipated impacts to be covered in the scoping report**

setting out the range of potential impacts that could occur, building on what has already been done using data and insights that have been collected from various activities described above. Details of the methods that have been used should be included to enable Marine Scotland to determine if the analysis is based on a robust and appropriate approach. Justification should be provided for any impacts that are scoped in or out. This could be based on suggestions made by stakeholders and the public during stakeholder engagement or an assessment based on the analysis of primary and secondary data.

It is helpful if the scoping report includes details on the approach to be used for the SEIA including methods for data collection, planned stakeholder engagement activities and data-sets to be used.

#### **Post scoping activities for the SEIA**

The scoping opinion will advise on the final list of socio-economic impacts to be assessed in the SEIA. This may require additional data collection/ social research to enable a more rigorous assessment of a narrower set of anticipated impacts. It may also require further stakeholder engagement in order to check the significance of impacts with different groups, and the acceptability of mitigation options.

The data and information that has been collected throughout the scoping phase will be used to conduct steps 9, 10 and 11 below.

**9) Conduct baseline analysis** to assess the situation in the absence of the development, to provide a point of comparison against which to predict and monitor change. Appropriate social and economic measures should be used for the baseline and cover relevant issues (see section 4 for suggested data sources). Key stakeholders and other interested parties including affected communities and sectors may be aware of baseline data to be included, and this can be explored in the participatory approaches described above. The findings from social research can also be included in the baseline. Note that baseline data can be presented in the scoping report but is also the first stage of the SEIA and so should be included in the SEIA report.

**10) Predict impacts and assess their significance (otherwise known as impact appraisal or options appraisal):** Through analysis, estimate the social and economic changes and their expected impacts, considering any alternative development options and how significant the impacts might be. This is the core part of the assessment and forms the main part of the assessment report.



Different methodologies and both primary and secondary data inform this part of the exercise.

Different phases of the development should be covered (development, construction, operation and maintenance) and also transitions between phases (if relevant).

The knock on socio-economic consequences of impacts in other parts of the EIA assessment should be assessed here, such as the impact on commercial fisheries, and impacts on related industries such as tourism could also be included.

It is important to consider distribution of impacts among different social groups (covering protected quality characteristics, socio-economic groups and geographic area where relevant to do so).

Economic impact appraisal should include consideration of:

- Direct, indirect and induced impacts
- Leakage, displacement and substitution effects
- Deadweight
- Cumulative impacts
- Sensitivity analysis to account for risk, uncertainty and optimism bias

There are a range of methodologies for calculating direct, indirect and induced impacts. These include the appropriate use of multipliers, a local content methodology, stakeholder involvement and expert opinion.

Modelling approaches should be realistic, based on robust data, and avoid over promising the economic impacts

All prices should be presented in real terms (excluding inflation) and should state which year the prices represent.

## **11) Development enhancement, mitigation strategy and complete SEIA report.**

There may be an opportunity for adaptation or other approaches to mitigate potentially adverse impacts and to maximise positive opportunities. This may include engagement with the community to develop a strategy for enhancing benefits and mitigating against impacts; or development of a Community Benefit Agreement (CBA). Again these activities should be done collaboratively with stakeholders where relevant and appropriate.

The SEIA report should clearly set out the methods used in the assessment, justification for decision made such as scoping certain impacts in or out of the assessment, and the approach to analysis. The report should cover the baseline analysis and results of the impact prediction or appraisal, and distributional impacts. Social and economic impacts can be set out separately (where this makes sense) and together where they overlap.

It is good practice for the report to be reviewed by the people (i.e. the wider group of stakeholders and communities) who were involved in providing data for its production.

### **Section 3. Examples of different types of socio-economic impacts**

In the literature social and economic impacts are defined in many different ways. Sometimes social and economic impacts are covered separately, whilst other sources refer to socio-economic impacts.

The following table sets out some commonly identified socio-economic impacts.

#### **Examples of Socio-economic Impacts from Glasson 2017<sup>1</sup>**

##### **1. Direct economic:**

- GVA
- employment, including employment generation and safeguarding of existing employment;
- characteristics of employment (e.g. skill group);
- labour supply and training; and
- other labour market effects, including wage levels and commuting patterns.

##### **2. Indirect/induced/wider economic/expenditure:**

- employees' retail expenditure (induced);
- linked supply chain to main development (indirect);
- labour market pressures;
- wider multiplier effects;
- effects on existing commercial activities (eg tourism; fisheries);
- effects on development potential of area; and

##### **3. Demographic:**

- changes in population size; temporary and permanent;
- changes in other population characteristics (e.g. family size, income levels, socio-economic groups); and
- settlement patterns

##### **4. Housing:**

- various housing tenure types;
- public and private;
- house prices and rent / accommodation costs;
- homelessness and other housing problems; and
- personal and property rights, displacement and resettlement

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<sup>1</sup> Glasson J (2017a) "Socio-economic impacts 2: Overview and economic impacts" in Therivel R and Wood G (eds.), *Methods of Environmental and Social Impact Assessment*, Abingdon: Routledge

## 5. Other local services:

- public and private sector;
- educational services;
- health services; social support;
- others (e.g. police, fire, recreation, transport); and
- local authority finances

## 6. Socio-cultural:

- lifestyles/quality of life;
- gender issues; family structure;
- social problems (e.g. crime, ill-health, deprivation);
- human rights;
- community stress and conflict; integration, cohesion and alienation; and
- community character or image

## 7. Distributional effects:

Distributional analysis is a term used to describe the assessment of the impact of interventions on different groups in society. Interventions may have different effects on individuals according to their characteristics such as income level or geographical location

- effects on specific groups in society (eg: by virtue of gender, age, religion, language, ethnicity and location); environmental justice

## Section 4: Useful Data Sources for Socio-Economic Impact Assessments

| Name                                    | Summary   | Link to Source  |
|---|---|---|
| Statistics.gov.scot                     | Contains a wide range of data by local authority and other geographic breakdowns. Has a search by subject and area option.  | <a href="https://statistics.gov.scot">statistics.gov.scot</a>   |
| Marine Economic Statistics, 2019        | Annual economic statistics publication including GVA and employment data for marine economy sectors.  | <a href="https://www.gov.scot/Topics/Statistics/Scotland/2019/marine">Scotland's Marine Economic Statistics 2019 - gov.scot (www.gov.scot)</a>              |
| Scottish Sea Fisheries Statistics, 2021 | Provides data on the tonnage and value of all landings of sea fish and shellfish by Scottish vessels, all landings into Scotland, the rest of the UK and abroad, and the size and structure of the Scottish | <a href="https://www.gov.scot/Topics/Statistics/Scotland/2021/sea-fisheries">Summary - Scottish Sea Fisheries Statistics 2021 - gov.scot (www.gov.scot)</a> |

|  |  |  |
|--|--|--|
|  | fishing fleet and employment on Scottish vessels.  |  |
| Scottish Shellfish Farm Production Survey 2021 | Statistics on employment, production and value of shellfish from Scottish shellfish farms.   | <a href="http://www.gov.scot">Scottish Shellfish Farm Production Survey 2021 - gov.scot (www.gov.scot)</a> |
| Scottish Annual Business Statistics 2020       | Scottish Annual Business Statistics (SABS) presents estimates of employment, turnover, purchases, Gross Value Added and labour costs. Data are provided for businesses that operate in Scotland. Data are classified according to the industry sector, location and ownership of the business. | <a href="http://www.gov.scot">Scottish Annual Business Statistics 2020 - gov.scot (www.gov.scot)</a>       |
| Sub-Scotland Economic Statistics Database      | The Sub-Scotland Economic Statistics Database provides economic, business, labour market and population data for Scotland, and areas within Scotland.  | <a href="http://www.gov.scot">Sub-Scotland Economic Statistics Database - gov.scot (www.gov.scot)</a>      |
| Nomis Official Labour Market Statistics        | Labour market statistics including data on employment, unemployment, qualifications, earnings etc.   | <a href="http://nomisweb.co.uk">Nomis - Official Labour Market Statistics (nomisweb.co.uk)</a>             |
| Economics of the UK Fishing Fleet 2020         | Economic estimates at UK, home nation and fleet segment level for the UK fishing fleet. The estimates are calculated based on samples of fishing costs and earnings gathered by Seafish as part of the 2020 Annual Fleet Economic Survey.  | <a href="#">Economics of the UK Fishing Fleet 2020 — Seafish</a>   |

|   |  |   |
|---|--|---|
| Scotland's Census, National Records of Scotland | Census data that provides information about the characteristics of people and households in the country.   | <a href="https://www.nrscotland.gov.uk">Scotland's Census   National Records of Scotland (nrscotland.gov.uk)</a>      |
| Scottish Index of Multiple Deprivation          | Collection of documents relating to the Scottish Index of Multiple Deprivation - a tool for identifying areas with relatively high levels of deprivation.          | <a href="https://www.gov.scot">Scottish Index of Multiple Deprivation 2020 - gov.scot (www.gov.scot)</a>              |
| The Green Book                                  | HM Treasury guidance on how to appraise and evaluation policies, projects and programmes.  | <a href="https://www.gov.uk">The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk)</a> |
| The Magenta Book                                | HM Treasury guidance on evaluation. Chapter 4 provides specific guidance on data collection, data access and data linking.   | <a href="https://www.gov.uk">The Magenta Book - GOV.UK (www.gov.uk)</a>   |
| Enabling a Natural Capital Approach (ENCA)      | Supplementary guidance to The Green Book. ENCA resources include data, guidance and tools to help understand natural capital and know how to take it into account. | <a href="https://www.gov.uk">Enabling a Natural Capital Approach (ENCA) - GOV.UK (www.gov.uk)</a>                     |

## Section 5: Further sources of guidance:

HM Treasury guidance on how to appraise and evaluate policies, projects and programmes: [The Green Book: appraisal and evaluation in central government](https://www.gov.uk)

Best practice in Social Impact Assessment according to the International Association for Impact Assessment: [Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects](https://www.iaia.org)

The project A two way Conversation with the People of Scotland on the Social Impacts of Offshore Renewables (CORR/5536) has developed elements of a conceptual framework on social values that can be used to support and inform existing processes for assessing the potential social impacts of offshore renewables plans: [Offshore renewables - social impact: two way conversation with the people of Scotland](https://www.gov.uk)

Best practice guidance for assessing the socio-economic impacts of OWF developments: [Guidance on assessing the socio-economic impacts of offshore wind farms \(OWFs\)](https://www.gov.uk)

# Marine Scotland Science

T: +44 (0)131 244 2500  
E: [MSS\\_Advice@gov.scot](mailto:MSS_Advice@gov.scot)

Emma Lees  
Marine Scotland Licensing Operations Team  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

**21 April 2023**

## **SALAMANDER OFFSHORE WIND FARM - CONSULTATION ON REQUEST FOR SCOPING OPINION**

Marine Scotland Science (MSS) have reviewed the request from MS-LOT and provide the following advice.

### **Commercial fisheries**

#### Data Sources

MSS recommend that the MMO Fisheries Statistics should be used to inform the baseline for commercial fisheries. The Scottish Sea Fisheries Statistics also provide similar data, although the MMO Fisheries Statistics are preferable, as explained in the Good Practice Guidance<sup>1</sup>. Currently neither of these sources are listed within the data sources table (Table 9-1). The MMO Fisheries Statistics includes data for vessels 10m and over, whereas the 2018 MMO dataset referred to in the data sources table is for vessels 15m and over only. Furthermore, both of these datasets have data available up to 2021, which is more up to date than the 2018 dataset. The link for the data source "Fishing - tonnage, effort and value change- Shellfish, Pelagic and Demersal (also with vessels of 10 m length) from 2017 – 2021" in the data table does not work, and it is unclear which data set this is. MSS recommend that this is clarified in the EIA.

MSS advise that AIS data from EMODnet referred to in the Good Practice Guidance<sup>1</sup> should be used for the assessment, rather than the 2019 MMO AIS dataset listed, as this will provide more up to date data.

MSS note the inclusion of the ScotMap data and advise that this dataset should not be relied upon to provide information on the commercial fisheries baseline for the inshore fleet as it is out of date. MSS recommend this dataset is used as a starting point and that consultation should be the primary source of information for the under-10m fleet.

MSS note that the VMS dataset has been used to produce figures for average VMS value (Figure 9-3). MSS advise that the VMS dataset is also used to produce figures presenting the fishing effort (kW per hour) for UK vessels, which will provide further information about the commercial fisheries baseline.

## Potential Impacts and Scoping

MSS do not agree that all impacts have been presented and scoped in within Table 9-3. In general the impacts require more clarity in the scoping justification column and the table was hard to follow due to inconsistencies.

MSS note that the first impact in the table refers only to the loss of access to fishing grounds due to presence of vessels and safety zones. The justification states this is a temporary restriction of access to fishing grounds. MSS advise that this impact should also include the loss of access to fishing grounds due to the presence of the turbines in the array area, and that this has the potential to be a long term and potentially permanent restriction for fishing activity, not temporary. Long term restriction of access is mentioned in the “Increased steaming times” impact justification, and the displacement caused by these long term loss of grounds is covered under the 6<sup>th</sup> impact in the table, but the actual loss of grounds has not been listed as an impact.

The impact “Displacement of fishing activity into other areas” refers to temporary displacement during construction and decommissioning in both the offshore array and the cable corridor. However the 6<sup>th</sup> impact in the table which covers displacement during the operation and maintenance phase refers only to the offshore array. MSS advise this is changed to also scope in displacement in the cable corridor during the operation and maintenance phase.

The impact “Interference with fishing activity as a result of increased vessel traffic” is scoped in only for the construction and decommissioning phases, however the justification states this also relates to the operation and maintenance phase. MSS recommend that this is clarified, as this impact should be scoped in for the operation and maintenance phase as well.

The impact “Safety issues for fishing vessels” in both the offshore array and cable corridor is not scoped in for the operation and maintenance phase. MSS recommend that this is scoped in due to the risk of snagging of fishing gear on the cable or cable protection once installed. MSS note the impact “Potential for fishing gear to become entangled with floating foundations and associated anchoring system” covers the risk of snagging in the array during operation and maintenance phase, however this impact did not include the cable corridor either. Gear snagging on cables has been mentioned under cumulative impacts but is not covered in this table.

MSS note that the difference between the impact “Increased steaming times” and the impact “Obstruction of regular fishing vessel transit routes due to the presence of floating foundations and associated moorings” is unclear. MSS advise that the impact “Obstruction of regular fishing vessel transit routes...” is actually a cause for increased steaming times, alongside displacement of fishing activity, and as such should be part of the justification for “Increasing steaming times” rather than a separate impact.

## General Comments

On page 185 the final paragraph refers to figure 9-2 when it appears it should be Figure 9-3.

## References



[1] Marine Scotland (Xodus) 2022. Assessing fisheries displacement by other licensed marine activities: good practice guidance. [5 Good Practice Guidance: commercial fisheries data - Assessing fisheries displacement by other licensed marine activities: good practice guidance - gov.scot \(www.gov.scot\)](#)

Yours sincerely,

**Renewable Energy Environmental Advice group**  
Marine Scotland Science

# Maritime & Coastguard Agency



Maritime &  
Coastguard  
Agency

**Vaughan Jackson**  
Maritime and Coastguard Agency  
UK Technical Services - Navigation  
Bay 2/24  
Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG

[www.gov.uk/mca](http://www.gov.uk/mca)

Your Ref: SCOP-0021

Date: 12<sup>th</sup> April 2023

Emma Lees  
Marine Scotland - Marine Planning & Policy  
Scottish Government  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

Via email: [MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot)

Dear Emma Lees,

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 AND MARINE LICENCE APPLICATIONS FOR THE SALAMANDER OFFSHORE WIND FARM - UNDER THE EIA REGULATIONS.**

The MCA has reviewed the scoping report provided by Simply Blue Energy for Salamander Offshore Wind Farm as detailed in your correspondence of 16<sup>th</sup> March 2023 and would like to comment as follows:

The Environmental Impact Report should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:

- Collision Risk.
- Navigational Safety.
- Visual intrusion and noise.
- Risk Management and Emergency response.
- Marking and lighting of site and information to mariners.
- Effect on small craft navigational and communication equipment.
- The risk to drifting recreational craft in adverse weather or tidal conditions.
- The likely squeeze of small craft into the routes of larger commercial vessels.

The development area carries a moderate amount of traffic with several important commercial shipping routes to/from UK ports and the North Sea. Attention needs to be paid to routing, particularly in heavy weather so that vessels can continue to make safe passage without large-scale deviations. The likely cumulative and in combination effects on shipping routes should be considered for this project. It should consider the proximity to other windfarm developments, other infrastructure, and the impact on safe navigable sea room.

A Navigational Risk Assessment will need to be submitted in accordance with MGN 654. This NRA should be accompanied by a detailed MGN 654 Checklist which can be found at <https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>

We understand from the information presented in table 9-4 and section 9.2.5.2 that the preliminary assessment of 28 days (1<sup>st</sup>-14<sup>th</sup> July 2021 and 18<sup>th</sup> – 31<sup>st</sup> December 2021) of Automatic Identification System (AIS) data, is presented in figure 9-8. We would like to remind the applicant that a vessel traffic survey must be undertaken to the standard of MGN 654 – at least 28 days which is to include seasonal data (two x 14-day surveys) collected from a vessel-based survey using AIS, radar and visual observations to capture all vessels navigating in the study area. This data shall be updated once the project-specific summer/winter vessel traffic survey has been completed.

The Development Specification and Layout Plan referred to in Section 9.3.6 table 9-9 and table 13-1 in Annex 2 will require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.

We note in section 9.2.8, that Cumulative Effects Assessment will be carried out. As highlighted in this section, the proximity to other projects and activities will need to be fully considered, with an appropriate assessment of the distances between OREI boundaries and shipping routes as per MGN 654. Attention must be paid to the traffic for ensuring the established shipping routes within the North Sea and particularly to / from Peterhead can continue safely without unacceptable deviations.

Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location.

Particular consideration will need to be given to the implications of the site size and location on SAR resources and Emergency Response Co-operation Plans (ERCoP). The report must recognise the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)). A SAR checklist will also need to be completed in consultation with MCA, as per MGN 654 Annex 5 SAR requirements.

MGN 654 Annex 4 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report the survey or conduct it to Order 1a might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose.

It is noted in section 4.3 that HVAC transmission infrastructure maybe installed. We would like to remind the applicant that in the case of any HVDC installation, consideration must be given to the effect of electromagnetic deviation on ships' compasses. The MCA would be willing to accept a

three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five degrees will be attained. If an HVDC cable is being used, we would expect the applicant to do a desk based compass deviation study based on the specifications of the cable lay proposed and assess the effect of EMF on ship's compasses. MCA may request for a deviation survey post the cable being laid; this will confirm conformity with the consent condition. The developer should then provide this data to UKHO via a hydrographic note (H102), as they may want a precautionary notation on the appropriate Admiralty Charts (actions at a later stage depending upon the desk-based study and post installation deviation survey).

#### Section 9.3.11, Scoping Questions to Consultees:

- Do you agree that all relevant legislation, policy and guidance documents have been identified for the shipping and navigation assessment, or are there any additional legislation, policy and guidance documents that should be considered?

Compliance with Regulatory Expectations on Moorings for Floating Wind and Marine Devices (HSE and MCA, 2017). This guidance should be followed, and a Third-Party Verification of mooring arrangements will be required.

- Do you agree with the study area defined for shipping and navigation?

Yes.

- Do you agree with the data and information sources identified to inform the baseline for shipping and navigation including the planned vessel traffic surveys, or are there any additional data and information sources that should be considered?

Yes. Vessel traffic survey must be undertaken to the standard of MGN 654.

- Do you agree with the suggested embedded mitigation measures?

Yes.

- Do you agree that all potential receptors and impacts have been identified for shipping and navigation?

Yes.

- Do you agree that the impacts proposed can be scoped out of the shipping and navigation EIA chapter?

We would expect that all the identified potential impacts identified in chapter 9.2, in particular table 9-6, should be scoped in.

- Do you agree with the approach for cumulative effects assessment and transboundary impacts?

Yes.

- Do you agree with the proposed assessment approach and list of planned consultees?

Yes.

On the understanding that the Shipping and Navigation aspects are undertaken in accordance with MGN 654 and its annexes, along with a completed MGN checklist, MCA is likely to be content with the approach.

Yours sincerely,

[Redacted]

Vaughan Jackson  
Offshore Renewables Project Lead  
UK Technical Services Navigation

Met Office



Emma Lees  
Marine Licensing Casework Officer  
Marine Scotland – Marine Planning & Policy  
The Scottish Government  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

BY EMAIL

[ms.marinerenewables@gov.scot](mailto:ms.marinerenewables@gov.scot)

Your Ref: **SCOP-0021**

Our Ref: **MO759**

28<sup>th</sup> March 2023

Dear Emma

**Request for Scoping Opinion for Proposed Section 36 Application and Marine Licence for The Salamander Offshore wind farm located 35km east off the coast of Peterhead**

We refer to your emails of 16<sup>th</sup> March 2023 seeking Met Office comments on the above scoping report and supporting information given the proximity of the Met Office weather radar at Hill of Dudwick, near Peterhead.

I am therefore writing to confirm that Met Office have concerns about the proposal. As a consequence, we may object to a planning application for the development in its current form.

A key requirement for the Hill of Dudwick weather radar is to provide advance warning of severe weather and real-time information which is vital to the continued operation of military and civilian aviation as well as to forecasters in both Scotland and the wider UK (as part of the UK Weather Radar Network), including input to flood forecasting in coordination with the Scottish Environmental Protection Agency (SEPA).

Wind turbines have been shown to have detrimental effects on the performance of Met Office weather radars. These effects include the blocking of radar data in the vicinity of the turbines and the creation of false 'clutter' returns which can imitate or obscure real precipitation signals.

Met Office have reviewed the EIA Scoping Report and in particular those sections which reference the Met Office weather radar at Hill of Dudwick.

Whilst Met Office accept that the proposal is located beyond the officially safeguarded 20km zone of the Hill of Dudwick radar, it is not correct to conclude that the proposal will therefore not have any adverse impact on any meteorological radars.

FitzRoy Road, Exeter  
Devon, EX1 3PB  
United Kingdom

[enquiries@metoffice.gov.uk](mailto:enquiries@metoffice.gov.uk)  
[www.metoffice.gov.uk](http://www.metoffice.gov.uk)





At c. 46km from the Hill of Dudwick radar and based on the proposed blade tip height of up to 325m, the turbines may still be in line of sight of the radar where the lowest elevation scan is 310m. The proposal may therefore still result in degradation to the quality of Met Office services derived from weather radar data despite the turbines being located beyond the critical 20km consultation zone.

Met Office have concerns about any turbines which are located in line of sight and in the beam of the weather radar. However, it may be possible to mitigate against the potential risk of the turbines of this proposed scheme affecting the radar beam if, for example, the tip height of the turbines was no greater than 310m, rather than 325m as per the current proposal.

The Met Office wishes to be consulted and notified about the progress of any submissions relating to this proposal to verify that it will not adversely affect Met Office interests.

I hope this adequately explains our position on the matter. Further information about the effects of wind turbines on Met Office interests can be obtained from the following website: [Protecting our observing capability - Met Office](#)

[Redacted]

Met Office Safeguarding  
Email: [metofficesafeguarding@metoffice.gov.uk](mailto:metofficesafeguarding@metoffice.gov.uk)

FitzRoy Road, Exeter  
Devon, EX1 3PB  
United Kingdom

[enquiries@metoffice.gov.uk](mailto:enquiries@metoffice.gov.uk)  
[www.metoffice.gov.uk](http://www.metoffice.gov.uk)

Ministry of Defence



Defence  
Infrastructure  
Organisation

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

Application Ref: SCOP-0021

Telephone: [Redacted]

Our Reference: DIO10050814

E-mail: Teena.oulaghan100@mod.gov.uk

Emma Lees  
Scottish Government  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

By Email only

09 May 2023

Dear Emma,

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION AND MARINE LICENCES FOR THE SALAMANDER OFFSHORE WIND FARM LOCATED 35 KILOMETRES EAST OFF THE COAST OF PETERHEAD.**

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017.**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017.**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007.**

Thank you for consulting the Ministry of Defence (MOD) on the above detailed Scoping Opinion in respect of the Salamander Offshore Wind Farm development. Consultation correspondence was received by this office on 16 March 2023.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

It is acknowledged that, at this time, details of the precise location, dimensions, and configuration of the turbines and associated infrastructure is not available and that a study area has been designated.

I write to confirm the safeguarding position of the MOD on information that should be provided in the Environmental Statement to support any application, this response is based on the Environmental Impact Assessment Scoping Report dated 21/02/2023 (Document Reference. 08140473) which

recognises some of the principal defence issues that will be of relevance to the progression of the proposed development.

This scheme will comprise of up to 7 wind turbines (floating structures), with a maximum height to blade tip of up to 325 metres above Lowest Astronomical Tide (LAT) that will be located approximately 35km due east of Peterhead in North Sea. In addition to the turbine structures there will floating structures to support the wind turbines. This will be connected via interconnector cables. Up to two offshore export cables will then connect the OSP to the landfall on the coastline 2.5km to north of Peterhead in the north-east of Scotland.

The MOD is identified in Section 9.3.3.1 as a stakeholder with particular interest in Aviation and Radar. Wind turbine development has the potential to affect, and be detectable by, radar systems and can have a significant and detrimental impact on the capability and operation of such systems. In Table 9-10, the report identifies the potential impact the development will have in relation to Remote Radar Head (RRH) Buchan. The impact of the development on this radar should be considered as the design is progressed and any impact will need to be mitigated, it will be for the applicant to provide appropriate technical mitigation(s).

The applicant should be advised to take account of the current published MOD Practice and Exercise Areas (PEXA) in preparation of their development proposal. The MOD has highly surveyed routes which maybe relevant to the installation of the export cables & associated infrastructure. MOD should be consulted at the next stage of any application.

With regard to aviation safety, the requirement to install aviation safety lighting on the turbines proposed is set out in Table 9-9. The MOD would request that the development is fitted with MOD accredited aviation safety lighting in accordance with the Air Navigation Order 2016. The MOD will also require that sufficient information is submitted to ensure accurate marking of the development on aeronautical charts.

The potential for unexploded ordnance (UXO) to be present within the study area and the necessity for clearance is acknowledged within Section 4.6.8 of the Scoping Report. The potential presence of UXO and disposal sites should be a consideration during the installation and decommissioning of turbines, cables, and any other infrastructure, or where other intrusive works are necessary.

The landfall and onshore elements of the proposal, described in Section 4.6.5 and 4.6.6 of the scoping report, identifies landfall at north of Peterhead. As the proposal matures MOD would hope to be consulted in order that any impact on MOD assets can be identified.

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

Yours faithfully,

[Redacted]

Teena Oulaghan  
Safeguarding Manager

# NATS Safeguarding

**From:** [NATS Safeguarding](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** RE: SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 15 April 2023 [SG31659]  
**Date:** 24 March 2023 14:27:03  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[SG31659 Salamander Offshore Wind Farm - TOPA Issue 2.pdf](#)

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Our Ref: SG31659

Dear Sir/Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA SG31659.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries, please contact us using the details below.

Yours faithfully

**NATS**

NATS Safeguarding  
E: [natssafeguarding@nats.co.uk](mailto:natssafeguarding@nats.co.uk)  
4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)



NATS Public

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# Technical and Operational Assessment (TOPA)

For Salamander Offshore  
Wind Farm Development

NATS ref: SG31659

Issue 2

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## Publication History

| Issue | Month/Year | Change Requests and summary      |
|-------|------------|----------------------------------|
| 1     | June 2021  | Combined Pre-planning Assessment |
| 2     | March 2023 | Scoping Request                  |

## Document Use

External use: Yes

## Referenced Documents

# 1. Background

## 1.1. En-route Consultation

NATS en-route plc is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of RADAR's, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and as such assesses the potential impact of every proposed development in the UK.

The technical assessment sections of this document define the assessments carried out against the development proposed in section 3.

## 2. Scope

This report provides NATS En-Route plc's view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS RADAR used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS' statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

### 3. Application Details

Marine Scotland (Scottish Government) submitted a request for a NATS technical and operational assessment (TOPA) for the development at Salamander Offshore Wind Farm. It will comprise turbines within the area as detailed in Table 1 and shown in the diagrams contained in Appendix B.

| Turbine | Lat     | Long    | East   | North  | Tip Height (m) |
|---------|---------|---------|--------|--------|----------------|
| 1       | 57.6466 | -1.1960 | 448093 | 862138 | 325            |
| 2       | 57.6158 | -1.1261 | 452308 | 858762 | 325            |
| 3       | 57.5784 | -1.2047 | 447658 | 854540 | 325            |
| 4       | 57.6322 | -1.2671 | 443864 | 860484 | 325            |

**Table 1 – Turbine Details**

### 4. Assessments Required

The proposed development falls within the assessment area of the following systems:

| En-route Surv   | Lat     | Long    | nm   | km   | Az (deg) | Type |
|-----------------|---------|---------|------|------|----------|------|
| Alanshill Radar | 57.6431 | -2.1655 | 29.0 | 53.7 | 92.3     | CMB  |
| Perwinnes Radar | 57.2123 | -2.1309 | 37.3 | 69.0 | 50.7     | CMB  |
| En-route Nav    | Lat     | Long    | nm   | km   | Az (deg) | Type |
| None            |         |         |      |      |          |      |
| En-route AGA    | Lat     | Long    | nm   | km   | Az (deg) | Type |
| None            |         |         |      |      |          |      |

**Table 2 – Impacted Infrastructure**

## 4.1. En-route RADAR Technical Assessment

### 4.1.1. Predicted Impact on Alanshill RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

### 4.1.2. Predicted Impact on Perwinnes RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

### 4.1.3. En-route operational assessment of RADAR impact

Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

| Unit or role  | Comment      |
|---------------|--------------|
| Prestwick ATC | Unacceptable |
| Aberdeen ATC  | Unacceptable |

*Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected RADAR, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.*

## 4.2. En-route Navigational Aid Assessment

### 4.2.1. Predicted Impact on Navigation Aids

No impact is anticipated on NATS' navigation aids.

## 4.3. En-route Radio Communication Assessment

### 4.3.1. Predicted Impact on the Radio Communications Infrastructure

No impact is anticipated on NATS' radio communications infrastructure.

## 5. Conclusions

### 5.1. En-route Consultation

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable.

## Appendix A – Background RADAR Theory

### Primary RADAR False Plots

When RADAR transmits a pulse of energy with a power of  $P_t$  the power density,  $P$ , at a range of  $r$  is given by the equation:

$$P = \frac{G_t P_t}{4\pi r^2}$$

Where  $G_t$  is the gain of the RADAR's antenna in the direction in question.

If an object at this point in space has a RADAR cross section of  $\sigma$ , this can be treated as if the object re-radiates the pulse with a gain of  $\sigma$  and therefore the power density of the reflected signal at the RADAR is given by the equation:

$$P_a = \frac{\sigma P}{4\pi r^2} = \frac{\sigma G_t P_t}{(4\pi)^2 r^4}$$

The RADAR's ability to collect this power and feed it to its receiver is a function of its antenna's effective area,  $A_e$ , and is given by the equation:

$$P_r = P_a A_e = \frac{P_a G_r \lambda^2}{4\pi} = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4}$$

Where  $G_r$  is the RADAR antenna's receive gain in the direction of the object and  $\lambda$  is the RADAR's wavelength.

In a real world environment this equation must be augmented to include losses due to a variety of factors both internal to the RADAR system as well as external losses due to terrain and atmospheric absorption.

For simplicity these losses are generally combined in a single variable  $L$

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4 L}$$

## Secondary RADAR Reflections

When modelling the impact on SSR the probability that an indirect signal reflected from a wind turbine has the signal strength to be confused for a real interrogation or reply can be determined from a similar equation:

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r_t^2 r_r^2 L}$$

Where  $r_t$  and  $r_r$  are the range from RADAR-to-turbine and turbine-to-aircraft respectively. This equation can be rearranged to give the radius from the turbine within which an aircraft must be for reflections to become a problem.

$$r_r = \sqrt{\frac{\lambda^2}{(4\pi)^3}} \sqrt{\frac{\sigma G_t G_r P_t}{r_t^2 P_r L}}$$

## Shadowing

When turbines lie directly between a RADAR and an aircraft not only do they have the potential to absorb or deflect, enough power such that the signal is of insufficient level to be detected on arrival.

It is also possible that azimuth determination, whether this done via sliding window or monopulse, can be distorted giving rise to inaccurate position reporting.

## Terrain and Propagation Modelling

All terrain and propagation modelling is carried out by a software tool called ICS Telecom (version 11.1.7). All calculations of propagation losses are carried out with ICS Telecom configured to use the ITU-R 526 propagation model.

Appendix B – Diagrams

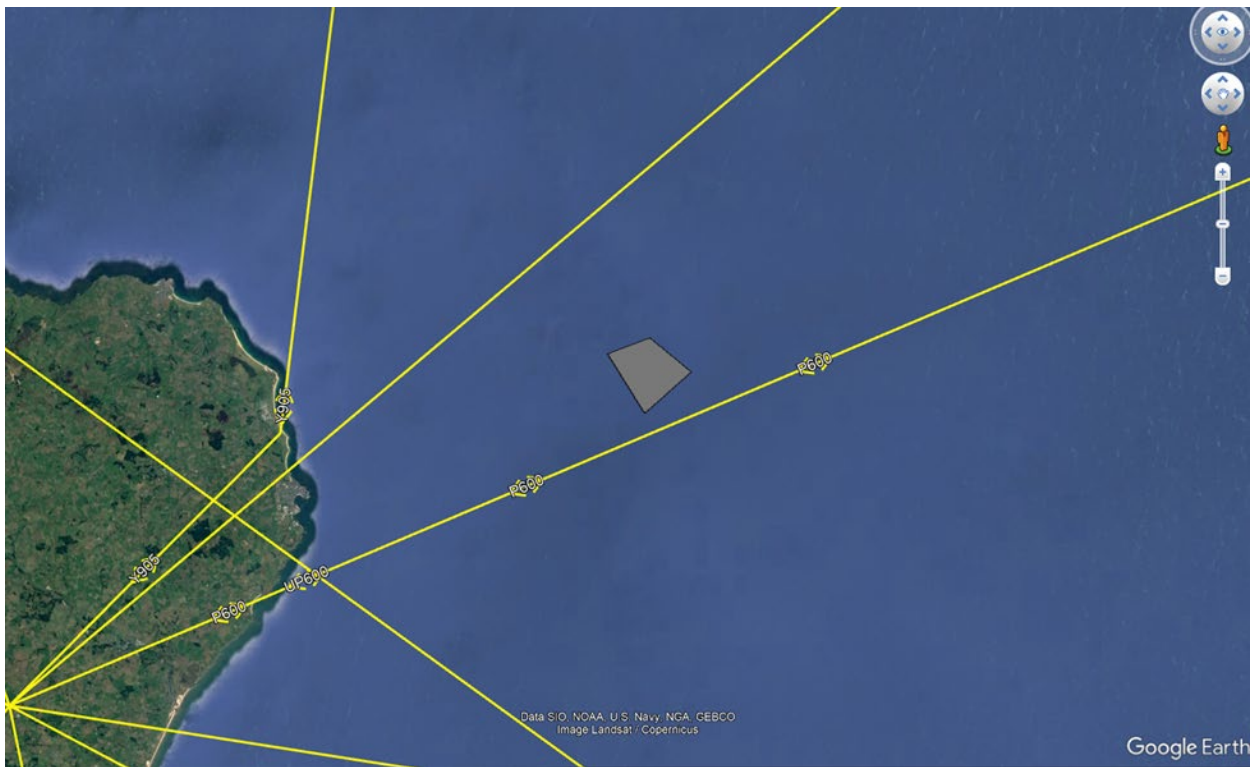


Figure 1: Proposed development location shown on an airways chart



# Natural England

Date: 14 April 2023  
Our ref: 428935  
Your ref: Salamander HRA Screening 08036558



Marine Scotland  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

Lancaster House,  
Hampshire Ct,  
Newcastle upon Tyne  
NE4 7YH

Tel: 0300 060 3900

**BY EMAIL ONLY**

Dear Emma,

**Salamander Offshore Windfarm – HRA Screening**

Thank you for your consultation dated 16 March 2023. The following constitutes Natural England's formal statutory response.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). We also have delegated responsibility from JNCC to also advise on offshore wind farms in all English waters out to 200 nautical miles or the median line.

Due to our remit, we have limited our advice to species from English protected sites and to species in English waters. We defer to NatureScot and JNCC for advice on Scottish matters.

Natural England considers that all matters in which we have an interest in English waters have been adequately considered in the HRA screening.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours sincerely,

Martin Peverley  
Marine Lead Adviser, Northumbria Team  
E-mail: [Martin.Peverley@naturalengland.org.uk](mailto:Martin.Peverley@naturalengland.org.uk)  
[Redacted]

NatureScot

Emma Lees  
Marine Directorate – Licencing Operations Team  
By email: MS.MarineRenewables@gov.scot

05 May 2023

Our ref: CNS REN OSWF DS  
Salamander

Dear Emma

**Salamander Offshore Wind Farm - Innovation and Targeted decarbonisation of Oil and Gas Proposal**

**NatureScot advice on Environmental Impact Assessment (EIA) Scoping Report and Habitat Regulations Appraisal (HRA) Stage 1 Screening Report**

Thank you for consulting NatureScot on the Environmental Impact Assessment (EIA) Scoping Report and Habitats Regulations Appraisal (HRA) Stage 1 Screening Report for the Salamander Offshore Wind Farm, and for granting us an extension to the response deadline.

Our advice on the natural heritage interests to be addressed within the Environmental Impact Assessment Report (EIAR) and advice on the HRA Stage 1 Screening Report is outlined below. Please note that the advice contained in this letter is in relation to the offshore components (seawards of MHWS) only.

**Policy context**

This proposal has come forward through the Innovation and Targeted Oil and Gas (INTOG) leasing round as a small scale (less than 100MW) innovation project. We note that the outcome of the Plan for INTOG is not yet finalised and as such our advice is to aid preparations for project level assessment if the Plan supports the development of this area.

**Proposal**

The proposal uses a project design envelope approach and as such we recommend recent Scottish Government guidance on this approach<sup>1</sup> is followed. The proposal comprises:

- Up to seven offshore wind turbine generators (WTGs) with a total generating capacity of up to 100MW;

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<sup>1</sup> <https://www.gov.scot/publications/guidance-applicants-using-design-envelope-applications-under-section-36-electricity-act-1989/>

- A maximum blade tip height of up to 325m above LAT and a minimum tip clearance of 22m above LAT;
- Floating substructures to support the WTGs (semi-submersible/barge or tension-leg platform being considered);
- Mooring and anchoring systems to connect the floating substructures to the seabed (up to 9 mooring lines and up to 9 anchors per substructure);
- Inter-array cables (including both dynamic and static parts);
- Connection hub(s)/joint(s) on the seabed;
- Export cable(s) as a continuation of the inter-array cables to bring the power ashore; and
- A proposed 35-year lease period.

The applicant wishes to provide an opportunity for the local supply chain to scale-up in preparation for the commercial, GW-scale opportunities in Scotland resulting from the ScotWind process. This will maximise the financial benefit of offshore wind power capabilities in Scotland and generate long term job opportunities for local communities.

### **Content of the Scoping Report**

We are generally content with the Scoping Report, and the proposed approach for the impact assessment that will support the forthcoming application(s).

### **Assessment approach**

The EIAR should consider the impact of all phases of the proposed development on the receiving environment, including effects from pre-construction activities as well as the construction, operation and maintenance and decommissioning phases.

We note some elements of pre-construction activities are specifically highlighted in the identification of impacts for some receptors such as seabed preparation on benthic interests. However, we advise potential impacts from pre-construction works need to be considered for all receptors.

We recommend that the following aspects are considered further and included in the EIAR.

#### *Ecosystem assessment*

Increasingly, there is a need to understand potential impacts holistically at a wider ecosystem scale in addition to the standard set of discrete individual receptor assessments. We note the intention in Section 6.5 to consider inter-related effects. This assessment should focus on potential impacts across key trophic levels particularly in relation to the availability of prey species. This will enable a better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance from the development of the wind farm on seabird and marine mammal (and other top predator) interests, and what influence this may have on population level effects.

#### *Wet storage*

Section 4.6.2 (Floating Substructures) refers to the potential for wet storage of the substructures prior to their installation within the array area, either at the initial assembly site, the wind turbine integration site or a separate dedicated storage location. Section 4.7.1 (Floating Assembly) also indicates that once operational the substructures and WTGs will form an integrated assembly piece – the replacement of any major component parts of which is expected to be achieved by

towing the assembly to port. Wet storage could represent a significant impact. Consideration of the potential impacts on all receptors needs to be addressed with the EIAR and HRA. We would welcome further discussion on this as and when further details are confirmed, noting the intention to seek a separate marine licence application for any requirements for wet storage outwith the array area.

#### *Climate change and carbon costs*

The impact of climate change effects should be considered, both in futureproofing the project design and in considering both the benefits (production of renewable energy) and carbon costs (manufacturing and disposal of components) i.e. the carbon cycle associated with the project overall. We recognise that some aspects of this topic are addressed in Section 9.9 (Climate Change and Carbon).

#### *Blue carbon*

In addition to the climate change and carbon assessment mentioned in the Scoping Report, we recommend that consideration is given to impacts on blue carbon. Not just in respect of the wind farm itself, but also in terms of any wet storage areas. We note that blue carbon has been recognised within the Benthic section of the Scoping Report at 8.1.5, with key habitats identified that support blue carbon storage and sequestration.

#### *Cumulative impact assessment*

We note that it is intended to use the Cumulative Effects Framework (CEF), currently being developed by MD-LOT, for the cumulative effects assessment for a number of receptors. However, our understanding is that the CEF currently only considers ornithology and marine mammal interests. Therefore, we advise further information is required as to how the cumulative assessments for the other receptors will be carried out.

We are concerned with the likelihood of multiple offshore export cables making landfall in the area around Peterhead and the potential for cumulative impacts arising from construction and associated geophysical, geotechnical and environmental survey programmes. Therefore, we recommend that this is considered further. We welcome the recent consultation to collaborate with Muir Mhor Wind Farm to reduce the number of geotechnical / geophysical surveys.

#### **Habitats Regulations Appraisal (HRA)**

We welcome being consulted on the EIA Scoping Report and HRA Stage 1 Screening Report to enable us to consider and provide advice under each assessment process at the same time. We provide HRA advice for ornithology, marine mammals, benthic ecology and migratory fish in each of the relevant appendices (see below).

#### **Positive effects for biodiversity and nature inclusive design**

We recommend both the consideration of positive effects for biodiversity as well as nature inclusive design aspects at this early stage and following through into the EIAR. Whilst not a current policy requirement, as part of our ability to address both the climate and biodiversity crises, we encourage developers to consider this as part of their application.

As an Innovation Project we advise consideration of exploring innovations that benefit biodiversity, reduce environmental impact and contribute towards closing current knowledge gaps.

## Mitigation

We welcome the embedded environmental measures described in each of the relevant sections of the Scoping Report. However, much of the embedded mitigation detailed throughout includes the development and adherence to post consent plans/programmes, these do not strictly constitute mitigation. The EIAR 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. We advise that the full range of mitigation and monitoring measures, and published guidance, are considered and discussed in the EIAR.

## Natural heritage interests to be considered

We provide advice as detailed below within receptor-specific technical appendices for key natural heritage interests to be considered within the EIAR and HRA:

- Advice on ornithological impact assessment is provided in **Appendix A**.
- Advice on marine mammal impact assessment is provided in **Appendix B**.
- Advice on seascape, landscape and visual impact assessment (SLVIA) is provided in **Appendix C**.
- Advice on benthic impact assessment is provided in **Appendix D**.
- Advice on fish and shellfish impact assessment is provided in **Appendix E**.
- Advice on marine physical processes is provided in **Appendix F**.

## Further information and advice

We hope this advice is of assistance to help inform the scoping opinion, noting that there may be aspects where further engagement is required to assist in undertaking the EIAR. Please contact me in the first instance for any further advice, using the contact details below, copying to our marine energy mailbox - [marineenergy@nature.scot](mailto:marineenergy@nature.scot).

Yours sincerely,

Kim McEwen

Marine Sustainability Adviser, Sustainable Coasts and Seas

[kim.mcewen@nature.scot](mailto:kim.mcewen@nature.scot)

## Appendix A - Ornithological Impact Assessment

Offshore ornithological interests are considered in Section 8.4 of the Scoping Report with additional detail on assessment tools/methods provided in Appendix A (Approach for estimating abundance for offshore ornithology baseline assessment) and Appendix C (Offshore Ornithology Assessment). We have responded to the questions raised in the Scoping Report within our advice below, noting that these are high level - with much of the detail was discussed and agreed during the Scoping workshop held on 28 November 2022.

Our advice with respect to the HRA Stage 1 Screening Report is also provided below.

### Legislation, policy & guidance

#### Scoping question from Section 8.4.11

*Do you agree that all relevant legislation, policy and guidance documents have been identified for the offshore ornithology assessment, or are there any additional legislation, policy and guidance documents that should be considered?*

In addition to the guidance and data sources outlined in Table 8-13 (Section 8.4.3), we refer the applicant to our recently published suite of ornithology guidance notes '*Guidance to Support Offshore Wind Applications: Marine Ornithology*'<sup>2</sup>, which should be reviewed in conjunction with the advice provided below.

Please also note the protection of Ramsar sites in Scotland<sup>3</sup> as detailed in Scottish Government policy.

### Study area

#### Scoping question from Section 8.4.11

*Do you agree with the study areas defined for offshore ornithology?*

We are content with the overall study area as proposed in Section 8.4.4 and Figure 8-14 which comprises the proposed (redefined) array area, export cable corridor and 4km buffer, noting that while the array has reduced in size, baseline data has been collected from the wider (original) area and associated buffer.

### Baseline characterisation

#### Scoping question from Section 8.4.11

*Do you agree with the data and information sources identified to inform the baseline for offshore ornithology, or are there any additional data and information sources that should be considered?*

Section 8.4.5 makes reference to the Year 1 Digital Aerial Survey (DAS) Report (March 2021 - February 2022) for which we provided advice to the applicant on 13 October 2022. Section 1 within Appendix C (Offshore Ornithology Assessment) provides an overview in Table 1-1 of those species recorded in the DAS between March 2021 and August 2022 noting that the full list of species to be considered in the impact assessment is still to be determined. We note that in Table 1-1 tern species are not considered for either displacement or collision risk. As advised in recent

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<sup>2</sup> <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/renewable-energy/marine-renewables/advice-marine-renewables-development>

<sup>3</sup> <https://www.gov.scot/publications/implementation-of-scottish-government-policy-on-protecting-ramsar-sites/>



scoping consultations (such as West of Orkney) these impacts should be considered for tern species if appropriate numbers are present on the site (after the full 2 years data are made available).

It would be helpful to see the final baseline characterisation report covering the full 24-month survey period once this is available, particularly as the survey campaign spans the highly pathogenic avian influenza outbreak including periods where higher mortality was experienced by some species/colonies. Further discussion may also be required to agree how any gaps in survey coverage are dealt with, if applicable.

Section 8.4.10 and Appendix A confirms, in line with advice provided during the Scoping workshop held on 28 November 2022, a model-based approach (MRSea) will be adopted to generate species-specific density surfaces using data collected from the site-specific surveys. We support this approach, which will make full use of data collected across the wider (133km<sup>2</sup>) area plus buffer to more accurately inform density surfaces for the redefined array area.

Further advice is available in guidance notes 2<sup>4</sup> & 9<sup>5</sup>.

### **Potential impacts**

#### Scoping question from Section 8.4.11

*Do you agree with the suggested embedded mitigation measures?*

*Do you agree that all potential receptors and impacts have been identified for offshore ornithology?*

We are content that requirements under the Marine Pollution Contingency Plan (MPCP) embedded mitigation measure is sufficient to address this impact pathway. However, please note that the full range of mitigation measures and published guidance should be considered and discussed in the EIAR.

No specific monitoring for offshore ornithology is mentioned in the ornithology section of the Scoping Report - further information on proposed ornithological monitoring should be discussed in the EIAR.

The standard pathways of collision, disturbance and displacement have been captured in Section 8.4.7, together with relevant indirect effects. Increasingly there is need to ensure inter-related effects are considered holistically across key trophic levels to enable better understanding of the consequences (positive or negative) of potential changes to prey distribution and abundance upon top predators including ornithological interests and how this may influence population level effects.

Consideration of pre-construction seabed preparation works may be required particularly with respect to vessel transit routes and potential disturbance.

Barrier effects have been missed from Table 8-15 (Section 8.4.7). However, we accept that this impact pathway can be difficult to separate from displacement and that these can both be dealt

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<sup>4</sup> Guidance Note 2: Guidance to support Offshore Wind Applications: Advice for Marine Ornithology Baseline Characterisation Surveys and Reporting

<sup>5</sup> Guidance to support Offshore Wind Applications: Seasonal periods for Birds in the Scottish Marine Environment

with together in the assessment. As a general comment – we are moving towards terming these “distributional responses”.

Section 4.6.2 (Floating Substructures) refers to the potential for wet storage of the substructures prior to their installation within the array area, either at the initial assembly site, the wind turbine integration site or a separate dedicated storage location. Section 4.7.1 (Floating Assembly) also indicates that once operational the substructures and WTGs will form an integrated assembly – the replacement of any major component parts of which is expected to be achieved by towing the assembly to port. Wet storage could represent a significant impact pathway. Consideration of which including potential impacts on ornithology receptors needs to be addressed with the EIAR and forthcoming HRA. We would welcome further discussion on this as and when further project details are confirmed, noting the intention to seek a separate marine licence application for any requirements for wet storage outwith the array area.

## **Impact assessment**

### Scoping question from Section 8.4.11

*Do you agree with the approach to analysis and assessment that will inform the EIA?*

We are content with the high level summary provided in Section 8.4.10 on the tools and methods to be used in the impact assessment. Further detail can be found across our suite of guidance notes which we refer to below together with additional specific advice where appropriate.

### *Collision*

We are content with the use of the stochastic collision risk model (McGregor et al, 2018) and advise use of the 2022 update to the sCRM tool shiny app (Caneco 2022). This update should also be used to run deterministic outputs (with values specified to enable repeatability). Outputs for both stochastic and deterministic CRM should be presented using this tool. Table 3-1, Section 3, in Appendix C provides parameters for CRM for likely species which aligns with our guidance<sup>6</sup>. In terms of nocturnal activity, we would expect that Garthe and Hüppop (2004) be used for all species other than gannet which should use Furness et al. (2018), as stated in our guidance. We are aware that a Natural England report on nocturnal avoidance rates has just been published. NatureScot are currently reviewing this and will update our Guidance if needed. We aim to issue comments on the Natural England report to all ScotWind and INTOG applicants in the near future.

Avoidance rates for sCRM are presented in Table 3-2, Section 3, Appendix C. We are currently reviewing the Ozsanlav-Harris et al. (2022) report and will be providing an imminent update on our recommended avoidance rates.

The potential collision risk to migratory species should be assessed qualitatively with reference to the survey results and the existing strategic level report WWT and MacArthur Green (2014)<sup>7</sup>. However, we advise that an updated review of migratory routes and vulnerabilities across the UK is currently being prepared on behalf of Marine Directorate. This work also includes development of a stochastic migration CRM tool (known as mCRM) to enable quantitative assessment of risks to migratory Special Protection Area (SPA) species including swans, geese, divers, seaduck and

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<sup>6</sup> Guidance Note 7: Guidance to support Offshore Wind Applications: Marine Ornithology - Advice for assessing collision risk of marine birds

<sup>7</sup> Strategic assessment of collision risk of Scottish offshore wind farms to migrating birds

raptors. The updated review and its associated mCRM tool should be available imminently to then be used within the assessment.

### *Distribution responses (displacement / barrier effects)*

As confirmed through the Scoping workshop held in November 2022 we are content, in this instance, for the matrix approach to be used as the primary method to assess displacement, reiterating that we are also keen to see outputs from seabORD where possible. Table 2-1 in Section 2 (Appendix C) presents displacement and mortality rates that aligns with our guidance<sup>8</sup>. We are content with the parameterisation of seabORD as per Table 5-1, section 5 in Appendix C.

### *Apportioning*

We expect apportioning during the breeding season to be undertaken following the theoretical approach<sup>9</sup>, with the exception of kittiwake, guillemot, razorbill and shag species, which should use the apportioning tool (Butler et al. 2020)<sup>10</sup>.

For most species, non-breeding season impacts should be apportioned using the BDMPS approach (Furness, 2015)<sup>11</sup>. Species where we expect a majority of the breeding season population to be present in the surrounding region in the non-breeding season (for example guillemot and herring gull), the correct population to assess impacts for in the non-breeding season is a regional one defined by the breeding season mean-max foraging range plus 1 standard deviation distance.

For guillemot, non-breeding season impacts should be apportioned based on breeding season regional populations with reference tracking data from Buckingham et al. (2022)<sup>12</sup>.

Apportioning is not required for puffin in the non-breeding season. For herring gull during the non-breeding season – a correction factor should be applied to the breeding season regional population to account for the influx of non-UK and west coast UK birds into the North Sea BDMPS.

### *Population Viability Analysis (PVA)*

We support the use of the NE PVA tool (Searle et al, 2019) – please see guidance note 11<sup>13</sup> for further advice, noting that the modelling of impacts should be undertaken over three time periods:

- 25 years
- 35 years - the lease period
- 50 years

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<sup>8</sup> [Guidance Note 8: Guidance to support Offshore Wind Applications: Marine Ornithology Advice for assessing the distributional responses, displacement and barrier effects of Marine birds](#)

<sup>9</sup> [Interim Guidance on apportioning impacts from marine renewable developments to breeding seabird populations in SPAs](#)

<sup>10</sup> Butler, A., Carroll, M., Searle, K., Bolton, M., Waggitt, J., Evans, P., Rehfish, M., Goddard, B., et al. (2020). Attributing seabirds at sea to appropriate breeding colonies. *Scottish Marine and Freshwater Science* 11(8). Marine Scotland Science.

<sup>11</sup> Furness, R.W. (2015). Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS). *Natural England Commissioned Reports*, No.164.

<sup>12</sup> Buckingham, L., Bogdanova, M.I., Green, J.A., Dunn, R.E., Wanless, S., Bennett, S., Bevan, R.M., Call, A., Canham, M., Corse, C.J. and Harris, M.P., 2022. Interspecific variation in non-breeding aggregation: a multi-colony tracking study of two sympatric seabirds. *Marine Ecology Progress Series*, 684, pp.181-197.

<sup>13</sup> [Guidance Note 11: Guidance to support Offshore Wind Applications: Marine Ornithology - Recommendations for Seabird Population Viability Analysis \(PVA\)](#)

While we use a threshold of 0.02 percentage point to determine the need for PVA, we do not advocate use of a threshold when considering counterfactuals metrics. Instead we expect narrative to accompany the PVA output tables to justify assessment conclusions.

### **Cumulative effect and transboundary impacts**

#### Scoping question from Section 8.4.11

*Do you agree with the approach for cumulative effects assessment and transboundary impacts?*

We note and support the use of the CEF and direct the applicant to MD-LOT for further information on when this tool will be available.

We recently concluded that the Berwick Bank application would have an adverse effect on site integrity (AEoSI) across multiple seabird species within The UK European Site Network, some of which overlap with the species and sites likely to require assessment for this application. Due to this conclusion and the unknown outcome of the Berwick Bank application at present, we anticipate that multiple PVA models should be run, with and without Berwick Bank.

Cumulative assessment should be further discussed with MD-LOT and NatureScot to ensure that both the worst case and realistic worst case are both taken forward into a cumulative assessment.

The proposed approach to transboundary impacts is set out in Section 8.4.9. Further discussion on this topic with MD-LOT and NatureScot will be required following submission of the final Ornithology Baseline Report. The HRA Stage 1 Screening Report identifies connectivity and likely significant effect (LSE) with seabird populations that breed outside Scotland (see below).

### **HRA Stage 1 Screening Report**

Overall the HRA Stage 1 Screening Report sets out the screening process in a logical order and the overall conclusions as to which sites should be retained for further consideration following the screening stage can mostly be supported on the basis of potential connectivity and generic impact pathways. However, we provide the following advice.

We note that our marine ornithology guidance notes are not listed in Section 2.3 'Relevant Guidance'.

### **Impact pathways**

The HRA screening takes into consideration key impact pathways. However, impacts arising from wet storage have not been addressed in the HRA Stage 1 Screening Report and this will require further assessment, if wet storage is an integral part of the final application.

### **Connectivity and identification of key sites for breeding seabirds**

The applicant has used the screening tool (built by Niras for NatureScot and JNCC) to develop the initial long list, which used the recommended mean maximum plus 1 S.D. foraging ranges from Woodward et al (2019) (with some exceptions to this with respect to gannets, guillemots and razorbills). The applicant has biologically sense checked this by considering at-sea distances, with 5 SPAs and associated features screened out (see below), and we are content with this approach.

- Northern gannet at the Ailsa Craig SPA;
- Northern fulmar at the Isles of Scilly SPA;
- Black-legged kittiwake at the Rum SPA;

- Black-legged kittiwake at the Shiant Isles SPA; and
- European storm petrel at the Treshnish Isles SPA.

The applicant has undertaken 24 months of DAS data collection, which includes the original Area of Search (AoS) and a 4km buffer. We are aware of the change in offshore array area, which is now smaller than the original AoS and we are content with this. However, the HRA Stage 1 Screening Report states that the results from baseline surveys are only available from March 2021 to February 2022. We do not agree that any species or sites should be scoped out based on one year of data collection. Therefore, until the second year of data has been made available, we cannot agree with the species scoped out in Section 6.4.2.3, namely:

- Lesser black-backed gull at the Loch Leven Ramsar;
- Lesser black-backed gull at the Coquet Island SPA;
- Lesser black-backed gull at the Forth Islands SPA;
- European storm petrel at the Aukery SPA;
- European storm petrel at the Mousa SPA;
- European storm petrel at the North Rona and Sula Sgeir SPA;
- European storm petrel at the Sule Skerry and Sule Stack SPA;
- European storm petrel at the Treshnish Isles SPA;
- Great skua at the Fair Isle SPA;
- Great skua at the Fetlar SPA;
- Great skua at the Foula SPA;
- Great skua at the Handa SPA;
- Great skua at the Hermaness, Saxa Vord and Valla Field SPA;
- Great skua at the Hoy SPA;
- Great skua at the Ronas Hill – North Roe and Tingon SPA and Ramsar;
- Great skua at the St Kilda SPA;
- Leach's petrel at all SPAs for all aspects of the offshore array area;
- Manx shearwater at all SPAs and Ramsar sites for all aspects of the offshore array area; and
- Shag at all SPAs for all aspects of the offshore array area.

Gannet have been screened out during the breeding season only from Ailsa Craig SPA, Flamborough and Filey Coast SPA, St Kilda SPA and Sule Skerry and Sule Stack SPA due to tracking evidence in Wakefield *et al.* (2013). This study shows the segregated nature of gannet foraging and also shows no connectivity between the offshore array area and these colonies. We agree that for Ailsa Craig SPA, Flamborough and Filey Coast SPA and St Kilda SPA this can be applied and these sites screened out. However, there is a data gap on gannet tracking in the north east and therefore we consider this should not yet be applied to Sule Skerry and Sule Stack SPA.

Shag have been screened out for further assessment for offshore array areas. However, despite their relatively low displacement and collision, given the proximity to the site and the lack of any assessment with respect to wet storage or to the export cable corridor, we advise that there remains a potential for LSE.

Sandwich tern at Loch of Strathbeg SPA and Ythan Estuary, Sands of Forvie and Meikle Loch SPA is within connectivity distance to the offshore export cable corridor. We acknowledge the tracking evidence cited, however, until the second year of survey has confirmed the absence of this species (or minimal numbers) we do not agree that they can be scoped out at this stage. Therefore,

potential impacts within the export cable corridor during the construction phase will require further consideration with respect to Sandwich tern.

The applicant proposes to screen out Manx shearwater during the breeding season from Copeland Islands SPA, Rum SPA and Skomer, Skokholm and Seas off Pembrokeshire SPA based on tracking data from Dean *et al.* (2012), which shows these colonies forage in areas associated with the Irish Sea Front. They have considered the same is likely to apply to Glannau Aberdaron ac Ynys Enlli/ Aberdaron Coast and Bardsey Island SPA. We accept this approach.

Therefore, we agree the following can be screened out at this point:

- Northern gannet at the Ailsa Craig SPA;
- Northern gannet at the Flamborough and Filey Coast SPA;
- Northern gannet at the St Kilda SPA;
- Manx shearwater at the Copeland Islands SPA;
- Manx shearwater at the Rum SPA;
- Manx shearwater at the Skomer, Skokholm and Seas off Pembrokeshire SPA; and
- Manx shearwater at the Glannau Aberdaron ac Ynys Enlli/ Aberdaron Coast and Bardsey Island SPA.

For seabirds in the non-breeding season the HRA Stage 1 Screening Report did note that where the offshore array area overlaps with a BDMPS region, potential connectivity is assumed with the population associated with that region (as defined by Furness, 2015) including the SPAs that contribute to the population in the BDMPS region. The HRA Stage 1 Screening Report states that “for features where potential LSE has been identified in the breeding season, consideration will be given to impacts occurring across the entire annual cycle in the RIAA.” While we agree with this approach, the HRA Stage 1 Screening Report has not specified where SPAs have connectivity specifically in the non-breeding season (i.e. through BDMPS).

### **Connectivity and identification of key sites for Migratory birds (non-seabirds)**

The HRA Stage 1 Screening Report screens out LSE for migratory birds citing the WWT Consulting and MacArthur Green (2014) report: “This assessment concluded that at a strategic level the populations of the migratory birds considered in the report do not appear to be at risk of significant levels of additional mortality associated with Scottish wind farms. This assessment was undertaken in 2014 and therefore did not incorporate the Offshore Array Area” as well as this conclusion for Moray West “the strategic assessment was undertaken on a worst case basis, that a number of projects had been withdrawn and that the design envelopes for consented schemes had been substantially refined reducing risk levels that there was sufficient ‘flex’ in the report to indicate that any potential impact from Moray West would be within the impact magnitude predicted in the strategic assessment.”

Appendix B within the HRA Stage 1 Screening Report only specifically names two SPAs in relation to migratory waterbirds, Loch of Strathbeg SPA and Ythan Estuary, Sands of Forvie and Meikle Loch SPA.

This does not provide clear justification for which species are within migratory pathways and this statement is not verified by the references provided (with a few exceptions). We recommend seeking an update on the ongoing migratory collision risk project from MD-LOT. If published in time this should be used within the appraisal as it will take account of the increased number of proposed offshore wind projects in Scottish waters as well as the increase in turbine heights. If

this is not published in time, we advise further consideration in the assessment to bird migration pathways as presented in WWT and McArthur Green (2014).

### **Transboundary / cross border impacts**

Non-Scottish sites scoped in include:

- Coquet Island SPA for black-legged kittiwake, northern fulmar and Atlantic puffin;
- Farne Islands SPA for black-legged kittiwake and Atlantic puffin;
- Northumberland Coast Ramsar for black-legged kittiwake; and
- Rathlin Island SPA for northern fulmar.

We are content with this approach for seabirds during the breeding season.

## **Appendix B - Marine mammal Impact Assessment**

Marine mammal interests are considered in Section 8.3 of the Scoping Report and we have responded to the questions raised in the Scoping Report within our advice below. Our advice with respect to the Salamander Offshore Wind Farm HRA Stage 1 Screening Report is also provided below.

### **Study area**

We are content with the marine mammal study area as described in Section 8.3.4 of the Scoping Report.

### **Baseline characterisation**

Section 8.3.2 correctly identifies the relevant legislation, policy and guidance for marine mammal interests.

Table 8-9 captures most of the relevant baseline datasets, but we note the table mentions Wilson et al. 1999 for the bottlenose dolphin estimates (although the link is the correct one) - the reference should be Hammond et al. 2021. In addition, Arso Civil et al. 2019 (interim report) should be updated to Arso Civil et al. 2021<sup>14</sup> (final report). As noted in the Scoping Report, the SCANS-IV report is expected in 2023 and we agree this should be considered, if available within the timeframe for application.

Section 8.3.5.1 lists a number of species to be scoped in to be assessed quantitatively and qualitatively. Due to an increase in sightings of humpback whale on the east coast of Scotland in recent years, we advise that this species should also be qualitatively assessed.

### **Potential impacts**

We broadly agree with the impacts that are proposed to be scoped in and out of the assessment as detailed in Table 8-11 subject to the following advice.

Noise-related impacts have been scoped in for assessment but only for the construction and decommissioning phases. We advise that consideration should also be given to potential impacts from operational noise.

In addition, there is the potential for electromagnetic field (EMF) impacts from dynamic cables, therefore this should be scoped in for assessment. Whilst there is limited information available around the potential interaction between marine mammals, prey species and EMF from buried cables, there is an absence of information on potential interactions from these species and EMF from dynamic cables. Advice on potential monitoring of EMF is included below.

### **Approach to assessment**

We are generally content with the approach to assessment as detailed in Section 8.3.10.

The dose-response curve will be used to assess disturbance and we agree with this approach. However, we recommend that Graham et al. 2019 should be considered as well as Graham et al. 2017 in relation to this.

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<sup>14</sup> <https://group.vattenfall.com/uk/contentassets/c65a13553f864f599431d69c8c6a57b4/bottlenose-dolphin-monitoring---final-report-2021.pdf>



It is also noted that underwater noise modelling is proposed for unexploded ordnance (UXO) clearance. We would like to highlight the joint interim position statement<sup>15</sup> on UXO. Our preference is to see the use of deflagration as a removal technique and there is currently a deflagration campaign ongoing in Scottish waters. However, in the absence of the outcomes of this campaign, we advise that currently, both high order and low order clearance should be modelled to ensure the worst case scenario is assessed.

### **Cumulative impacts**

The cumulative effects assessment approach as detailed in Section 8.3.8 and we recommend and welcome the use of the CEF.

### **Mitigation and monitoring**

We are generally content with the embedded mitigation measures as per Table 8.3.6 along with the commitment for additional mitigation measures if required.

In relation to the guidance listed in the table for informing the Marine Mammal Mitigation Protocols for pile driving, geophysical surveys and UXO clearance - the JNCC 2010 explosives guidance is incorrectly referenced. This should be the 2021 JNCC guidance - we note this is correctly listed in Section 8.3.2.3.

As detailed in our advice above there is a lack of information on potential impacts of EMF from dynamic cables. Therefore, we encourage consideration of collaborating and contributing to monitoring of EMF impacts from dynamic cables as well as monitoring of entanglement with dynamic cables and mooring systems.

### **Transboundary / cross border impacts**

Consideration may need to be given to transboundary and cross border impacts for certain cetacean species, but not for seal species due to existing marine mammal management units. Once initial impact assessment has been carried out we can provide further advice on this aspect.

### **HRA Stage 1 Screening Report**

A precautionary approach has been used to screen in Special Areas of Conservation (SACs) designated for grey and harbour seals, with a 200km distance applied for determining potential LSE. As per Section 5.3 of the HRA Stage 1 Screening Report we advise in relation to connectivity for seals - 50km for harbour seal and 20km for grey seal. Therefore, any SACs with harbour and grey seal features located outwith these distances should be screened out from further assessment.

As noted in the HRA Stage 1 Screening Report, bottlenose dolphins from the Moray Firth SAC are known to regularly transit the east coast of Scotland. Therefore, we agree that the Moray Firth SAC should be screened in for bottlenose dolphin due to the location of the export cable corridor and the potential for underwater noise from piling activities and UXO clearance reaching the coastal area.

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<sup>15</sup> <https://www.gov.uk/government/publications/marine-environment-unexploded-ordnance-clearance-joint-interim-position-statement>

## **Appendix C - Seascape, landscape and visual impact assessment (SLVIA)**

SLVIA is considered in Section 9.4 of the Scoping Report and we have responded to the questions raised in the Scoping Report within our advice below.

### **Study area**

We are content with the study area as described in Section 9.4.4, with a buffer of 60km radius from the proposed offshore array area as an outer limit, within which theoretical visibility will be analysed.

### **Baseline information**

Section 9.4.2 correctly identifies the relevant legislation, policy and guidance for this receptor and Table 9-11 captures the relevant data and information sources to help inform the baseline characterisation for the SLVIA.

### **Viewpoints**

We are content with the draft list of proposed viewpoints as detailed in Table 9-12 of the Scoping Report.

For night-time visualisations we advise that baseline images are rendered to show a noticeable contrast between the land, sea and sky. The visualisations should also be representative of the low light levels with typical twilight conditions (i.e. dawn/dusk) to allow consideration of the landscape context.

### **Potential impacts**

We are content with the impacts proposed to be scoped in and out for seascape, landscape and visual resources as per Table 9-13, Section 9.4.7. The text preceding Table 9-13 suggests that visual effects during construction and decommissioning are proposed to be scoped out. However, in Table 9-13 only the introduction of artificial lighting during construction and decommissioning have been scoped out with the 'presence of activity and partially completed/dismantled structures during construction and decommissioning' scoped in for assessment. For clarity we agree with the justifications and conclusions in Table 9-13 regarding scoping in and out of potential impacts.

### **Impact assessment**

The proposed methodology for SLVIA is outlined in Section 9.4.10 and we are generally content with this as it reflects and takes cognisance of current good practice.

Having reviewed section 9.4.6 of the Scoping Report, the information provided in relation to embedded mitigation measures being proposed is indicative and high level at this stage. However, we note that measures may include limiting the horizontal spread of the wind farm or ensuring all turbines are of a standard size and design.

### **Cumulative impacts**

It is noted in Section 9.4.8 that the cumulative effects assessment will be undertaken with reference to, and use of, the CEF currently being developed. The CEF will be able to assist ornithology and marine mammal cumulative assessments only. Please refer to the following

guidance 'Assessing the cumulative landscape and visual impact of onshore wind energy development' (2021)<sup>16</sup> to assist in the consideration of the cumulative impact assessment.

For the most up to date information on which existing, under construction, consented and proposed proposals to include in the cumulative assessment we recommend contacting MD-LOT and Aberdeenshire Council.

### **Transboundary / cross border impacts**

We agree that there will be no transboundary or cross border impacts for seascape, landscape and visual impacts.

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<sup>16</sup> <https://www.nature.scot/doc/guidance-assessing-cumulative-landscape-and-visual-impact-onshore-wind-energy-developments>

## **Appendix D - Benthic Impact Assessment**

Benthic interests (subtidal and intertidal) are considered in Section 8.1 of the Scoping Report and we have responded to the questions raised in the Scoping Report within our advice below. Our advice with respect to the HRA Stage 1 Screening Report is also provided below.

### **Study area**

We are content with the study area as described in Section 8.1.4 and shown in Figure 8-1, which includes the offshore array area, export cable corridor plus a 15km buffer. We also note that a larger impact area has been considered in relation to the potential introduction of marine invasive non-native species (INNS).

### **Baseline information**

We are content that Section 8.1.2 correctly identifies the relevant legislation, policy and guidance for this receptor.

Table 8-1 captures the relevant baseline datasets, with Section 8.1.5 presenting an appropriate summary of existing data and baseline characterisation.

Section 8.1.2 details the benthic, subtidal and intertidal surveys that have been undertaken and are planned prior to submission of the EIAR. However, it is unclear from the Scoping Report whether the benthic survey work includes grab sampling. During the Scoping workshop (held 28 November 2022) it was noted that in the nearshore area (within 8km of the coast) only Drop Down Video (DDV) is proposed pre-application with a full benthic survey, including grab sampling, planned to be undertaken post consent, but prior to construction to fully inform potential impacts to benthic interests. However, we raised concerns during the workshop that some Priority Marine Features (PMFs), such as ocean quahog, will not be picked up using DDV only and thus advised consideration of predictive modelling as part of the EIA. This may also be a useful means of determining likely presence of PMFs. Our understanding from subsequent pre-application consultation is that grab sampling is now being undertaken in the nearshore area (out to 8km) this year, which we welcome. Therefore, we recommend that it is made fully clear in the EIAR what survey work has been undertaken, and where, in relation to informing the baseline characterisation and what further survey work and assessment (if any) is proposed post-consent.

In addition, we also recommend consideration of eDNA sampling to complement the benthic survey data.

### **Potential impacts**

Table 8-3 details the potential impacts to be scoped in and out of the benthic assessment, and we are broadly content, subject to the following comments. We note that impacts to designated sites has not been specifically scoped in for this receptor. Therefore, we advise that impacts to the Southern Trench nature conservation Marine Protected Area (ncMPA) benthic features (burrowed mud) is scoped in for assessment for all phases of development. This should be assessed separately against the ncMPA Conservation Objectives.

We recommend that the assessment should quantify, where possible, the likely impacts to key benthic ecology PMFs<sup>17</sup>. It should assess whether these could lead to a significant impact on the national status of the PMFs being considered<sup>18</sup>.

In addition, we note that the increased risk of introduction and spread of INNS has been scoped out for the operation and maintenance phase. However, there is a risk of potentially introducing and spreading marine INNS during the operation and maintenance phase, particularly due to biofouling (and cleaning procedures) on the floating structures. Therefore, we advise that this impact is also scoped in for assessment for this phase.

### **Approach to assessment**

The proposed assessment approach is set out in Section 8.1.10 and we are generally content with this as detailed. However, we advise that the assessment should quantify, where possible, the likely impacts to benthic PMF species.

As well as PMFs, and as noted in Section 8.1.5 of the Scoping Report, there is the potential for *Sabellaria spinulosa* reefs to be present in the offshore development area. These reefs are of conservation value under OSPAR and Annex 1 of the Habitats Directive. Therefore, we advise that potential impacts to this habitat are also assessed in the EIAR.

Consideration should also be given to indirect impacts on birds, fish and marine mammals, where appropriate.

### **Cumulative impacts**

We are broadly content with the proposed approach to the cumulative assessment described in Section 8.1.8. However, as mentioned in the cover letter, we are concerned with the likelihood of multiple offshore export cables making landfall in the area around Peterhead, and the potential for cumulative impacts arising from construction and associated geophysical, geotechnical and environmental survey programmes. Therefore, we recommend that this is assessed in the EIAR.

In addition, we note that it is intended to use the CEF for the cumulative effects assessment. However, the CEF tool will be available for ornithology and marine mammal cumulative assessments only.

### **Mitigation and monitoring**

Table 8-2 sets out a number of embedded mitigation measures, along with the commitment for additional mitigation measures if required. However, we note a proposed embedded mitigation measure is to develop and implement an INNS Management Plan post consent. We advise that the EIAR should provide details on how INNS will be considered, monitored and recorded as well as being taken account of in biosecurity plans for each phase of the development.

### **Transboundary / cross border impacts**

We advise that there are unlikely to be any transboundary or cross border impacts for benthic interests.

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<sup>17</sup> <https://www.gov.scot/policies/marine-environment/priority-marine-features/>

<sup>18</sup> <https://www.nature.scot/doc/priority-marine-features-guidance>

**HRA Stage 1 Screening Report**

Section 6.2 of the HRA Stage 1 Screening Report has been reviewed in relation to benthic, subtidal and intertidal interests and we agree with the conclusion of no LSE on the Buchan Ness to Collieston SAC (vegetated sea cliffs) and the Sands of Forvie SAC (dunes) in relation to the offshore development.

In addition, we are content that there are no other SACs with benthic, subtidal or intertidal features that have connectivity to the offshore development area.

## Appendix E - Fish and Shellfish Impact Assessment

Fish and shellfish interests are considered in Section 8.2 of the Scoping Report. Our advice below focuses on those fish and shellfish species, and where appropriate their associated habitats, that are protected features of European sites or ncMPAs as well as those that are of conservation importance including PMFs and key prey species. We have responded to the questions raised in the Scoping Report within our advice below. In addition, our advice with respect to the HRA Stage 1 Screening Report is also provided below.

### Study area

We are content with the study areas as defined in Section 8.2.4 and shown in Figure 8-5 of the Scoping Report.

### Baseline information

Section 8.2.2 correctly identifies the relevant legislation, policy and guidance for this receptor. However, we recommend inclusion of the NatureScot Commissioned Report 791 'Understanding the potential for marine megafauna entanglement risk from marine renewable energy developments'<sup>19</sup>.

Table 8-4, Section 8.2.3 captures most of the relevant baseline datasets but we recommend the inclusion of 'Essential Fish Habitat Maps for Fish and Shellfish Species in Scotland' developed by the Scottish Marine Energy Research (ScotMER) programme<sup>20</sup>, which is due for publication imminently. We also recommend inclusion of the Feature Activity Sensitivity Tool (FEAST)<sup>21</sup>, which was due to be updated with fish and shellfish information by the end of March 2023.

With regard to data sources relating to fish and EMF, we recommend that a recent MSc paper by Lucie Hervé 'An evaluation of current practice and recommendations for environmental impact assessment of electromagnetic fields from offshore renewables on marine invertebrates and fish' is included as a data source. We can supply a copy of this paper on request.

We support the proposed approach of carrying out a desk-based analysis of existing fish and shellfish data. This will be supplemented by information obtained from site-specific benthic ecology surveys.

### *Priority Marine Features (PMFs)*

As highlighted in Section 8.2.5.3 of the Scoping Report a number of marine fish species are PMFs and consideration of impact to these species as PMFs should be included within the EIAR.

It is also noted in Section 8.2.5.3 that Atlantic salmon are the primary diadromous fish species being considered in the EIAR, although the assessment of other fish and shellfish species (including freshwater pearl mussel and lamprey) will be considered if it is concluded that these species have potential connectivity with the Project.

In addition to being qualifying features of European sites, Atlantic salmon are PMFs along with European eel and sea trout (the anadromous form of brown trout).

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<sup>19</sup> <https://www.nature.scot/doc/naturescot-commissioned-report-791-understanding-potential-marine-megafauna-entanglement-risk>

<sup>20</sup> <https://www.gov.scot/policies/marine-renewable-energy/science-and-research/>

<sup>21</sup> <http://www.marine.scotland.gov.uk/FEAST/>

Atlantic salmon are undergoing a significant decline across their global range, and numbers in Scotland have declined dramatically since 2010. This has led to the recent publication of a Scottish Wild Salmon Strategy (Scottish Government, 2022)<sup>22</sup>, and continuing high levels of mortality at sea is a significant issue.

European eel is a conservation priority due to a dramatic decrease in its population size over the last 20 years; it is listed as ‘critically endangered’ on the global IUCN Red list. However, very little is known about their local migration pathways, either as juveniles or adults.

Malcolm et al. (2010) contains a review of available data in relation to migration routes and behaviour, and Gill & Bartlett (2010) on effects of noise and EMF on European eel as well as sea trout. Sea trout support a number of fisheries in Scotland and many of these fisheries have undergone declines in the last 25 years.

Therefore, we advise that other migratory fish species are scoped in for assessment including sea trout, European eel, sea and river lamprey.

Freshwater Pearl Mussel (FWPM) should also be included in the assessment given that Atlantic salmon (and other salmonids) are integral to the lifecycle of this species. Therefore, any impacts to salmonids that prevent them from returning to their natal rivers may have a resulting effect on FWPM.

Section 8.2.5 focuses mainly on commercial fish and shellfish species, and it is not clear which shellfish species may be present in the study area such as flame shell, horse mussel, ocean quahog etc., which are PMFs and will require consideration.

There is no mention of basking shark, also a PMF, in the fish and shellfish section of the Scoping Report. Basking shark (and turtles) are mentioned in the marine mammal Section (8.3) of the Scoping Report, where they have been scoped out for further assessment. We are content with this approach due to the small numbers likely to be in this area. However, we recommend any mitigation put in place to minimise risks to marine mammals should also be applied to basking shark (and turtles), should they be present.

### **Potential impacts**

Table 8-8, Section 8.2.7 of the Scoping Report summarises the impacts proposed to be scoped into the assessment.

#### *Habitat loss and disturbance*

Habitat loss and disturbance (both temporary and long-term) is a key impact pathway identified for construction, operation and maintenance and decommissioning activities. All appropriate pre-construction seabed preparation works should also be included.

#### *Underwater noise and vibration*

We agree that underwater noise impacts should be scoped in for all project phases and should include sandeel (as well as migratory fish and spawning fish species) as they are present at the development site all year round, have a close association with the seabed and are unable to flee from noisy activities. UXO clearance should also be considered in the assessment.

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<sup>22</sup> <https://www.gov.scot/publications/scottish-wild-salmon-strategy/>



### *EMF impacts*

We welcome the scoping in of EMF effects as another impact pathway that is not well understood at present, to increase our understanding of the effects of subsea and dynamic cables, particularly as floating wind becomes an established technology. The impacts from EMF should be considered for all relevant fish species, including elasmobranch species, nephrops and diadromous fish, including migratory fish.

We note that cable burial is listed as an embedded mitigation measure and assume this is in relation to reducing impacts of EMF - we provide further advice on this below.

### *Colonisation of hard structures*

Due to the novel nature of floating offshore wind foundations, we advise that colonisation of hard structures is scoped in. This potential impact is also linked to whether marine growth will need removed, and if so, how will this be carried out.

### *Potential impacts on Southern Trench ncMPA*

There may be impacts on the minke whale protected feature of the Southern Trench ncMPA via impacts on prey fish species from the export cable corridor and we recommend this is scoped into the assessment.

### *Changes in prey species availability*

We advise consideration is required in the EIAR to ensure that impacts to key prey species (such as sandeel, herring, mackerel and sprat) and their habitats are considered for this development alone and cumulatively with other wind farms. We recognise that most EIAR's concentrate on receptor specific impacts. However, increasingly we need to understand impacts at the ecosystem scale. Therefore, 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 marine mammal (and other top predator) interests and how this may influence population level impacts. Consideration of how this loss and or disturbance may affect the recruitment of key prey (fish) species through impacts to important spawning or nursery ground habitats should also be assessed.

We note and welcome the inclusion of assessing fish and subsequent predator aggregation around the project infrastructure. The PrePARED (Predators and Prey Around Renewable Energy Developments) project<sup>23</sup> may be helpful in the understanding of predator-prey relationships in and around offshore wind farms.

### *Impacts to be scoped out*

We agree with the proposed impacts to be scoped out for fish and shellfish: accidental pollution; increased suspended sediment concentrations and barrier effects to migratory fish during operation and maintenance.

### **Approach to assessment**

We broadly support the approach to assessment set out in Section 8.2.10. However, we advise that in relation to PMFs the assessment should quantify, where possible, the likely impacts to key

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<sup>23</sup> <https://owecprepared.org/>

fish and shellfish PMF species. It should assess whether these could lead to a significant impact on the national status of the PMF being considered<sup>5</sup>.

### **Cumulative impacts**

The EIAR should consider the cumulative effects of key impacts such as habitat loss/change especially in relation to diadromous fish as well as key fish and shellfish species that contribute ecological importance as a prey resource. This may differ depending on the life stage being considered.

It is noted in Section 8.2.8 that as part of the EIA, the cumulative effects assessment will be undertaken with reference to, and use of, the CEF currently being developed. As noted previously, the CEF tool is available for ornithology and marine mammal cumulative assessments only at present.

### **Mitigation and monitoring**

We welcome embedded mitigation measures as detailed in Table 8-7, Section 8.2.6 and advise that the full range of mitigation measures and published guidance is considered and discussed in the EIAR.

It is noted that cable burial/protection informed by a Cable Burial Risk Assessment (CBRA) is listed as a proposed embedded mitigation measure (Table 8-7). However, we highlight research by Hutchison et al. (2020)<sup>24</sup> which establishes that cable burial may actually generate a response from sensitive species as it reduces EMF levels to the 'normal' range that species use to hunt prey or navigate.

There is also a proposed embedded mitigation measure to develop and implement an INNS Management Plan post consent. As advised above, the EIAR should provide details on how marine INNS will be considered, monitored and recorded as well as being taken account of in biosecurity plans for each phase of the development.

No specific monitoring for fish and shellfish is mentioned in the Scoping Report. We are aware of Marine Directorate proposals to carry out infield measurement of EMF to better understand impacts on benthic and fish species. Therefore, any input this project could assist with, either from project measurements or contributions to this wider work, would be very beneficial.

### **Transboundary / cross border impacts**

We agree that transboundary / cross border impacts can be scoped out from further consideration.

### **HRA Stage 1 Screening Report**

#### *Migratory fish*

Due to uncertainty on where migratory fish (Atlantic salmon, sea trout and sea and river lamprey) go within marine waters and connectivity back to natal rivers we consider these species should be assessed through EIA only and not through HRA. For some species, like seals, we have a reasonable understanding of connectivity to individual SACs. We also have population estimates for nearly all seal SAC populations in the standard data forms – part of the citation package. For

---

<sup>24</sup> Hutchison, Zoe & Gill, A. B. & Sigra, Peter & He, Haibo & King, John. (2020). Anthropogenic electromagnetic fields (EMF) influence the behaviour of bottom-dwelling marine species. Scientific Reports. 10.

diadromous fish species we do not have population data for any salmon or lamprey SAC on the data forms. This inability to understand connectivity to and within individual rivers to the development area, currently prohibits an informed assessment of the impact on individual site integrity. We are aware of work being led by ScotMER on diadromous fish and this is an area of research that may change conclusions on how diadromous fish are treated in both EIA and HRA going forward.

## **Appendix F - Marine physical processes**

Marine physical processes are considered in Section 7.1 of the Scoping Report and we have responded to the questions raised in the Scoping Report within our advice below.

### **Study area**

We are content with the study area as proposed in Section 7.1.4 and shown in Figure 7-1, which comprises the offshore array area and export cable corridor plus a buffer of 15km.

### **Baseline information**

We agree that the relevant legislation and policy (as described in Chapter 2), technical guidance (Section 7.1.2.1) and data sources (Table 7-1) have been identified.

### **Potential impacts**

The impacts that are to be scoped in and out of the assessment are detailed in Table 7-3 and we are generally content subject to the following advice.

We welcome that the Southern Trench ncMPA features are highlighted as a physical process receptor. However, the 'impact on designated features' in Table 7-3 is not characterised / identified. In addition, the methods for assessing this impact are not detailed in Section 7.1.10 (see further advice below). Therefore, we cannot be confident at this stage that the assessment will be adequate.

It appears from the feature mapping in the MPA Data Confidence Assessment<sup>1</sup> that the Moraines element of the Quaternary of Scotland feature may occur within the export cable corridor. These are relict landforms that cannot re-form if impacted. If any effects on Moraines are identified as possible, an assessment should be undertaken against the relevant MPA Conservation Objectives<sup>12</sup> as follows:

- Whether the landforms would '...remain sufficiently unobscured...' with regard to installation of infrastructure (construction phase);
- Whether their '...extent, component elements and integrity are maintained' with regard to both the installation (construction phase) and any hydrodynamic effects (construction and operation and maintenance phases).

We also welcome that 'changes to coastal landfall morphology' has been identified and scoped in. However, the potential impacts of trenched landfall cable(s) being re-exposed by future coastal change should also be assessed. The likelihood of expanding and accelerating erosional retreat is highlighted in the Scoping Report (Section 7.1.5.8 and at Figure 7-6). If hard engineering/protection of re-exposed cable(s) may be required in future, impacts on coastal morphology could arise. Therefore, this additional impact should be addressed either stand-alone or within the 'changes to coastal landfall morphology' impact. However, this may not be required if an embedded mitigation measure was included ensuring that re-exposed cable(s) would be appropriately re-buried without hard engineering/protection measures.

### **Approach to assessment**

The approach to assessment is set out in Section 7.1.10 and we provide the following advice. For tidal and wave regimes, suspended sediment concentrations, seabed morphology and coastal and landfall morphology, the proposed assessment method is noted as 'semi-quantitative desk-based

analysis'. Further detail on these methods is required for us to be confident that the assessment would be adequate.

The proposed assessment method for the 'impact on ncMPA designated features' needs to be set out and agreed in advance.

### **Cumulative impacts**

We are generally content with the cumulative impact assessment approach as set out in Section 7.1.8 but highlight again the CEF tool will be available for ornithology and marine mammal cumulative assessments only.

### **Mitigation and monitoring**

We welcome the embedded mitigation measures as proposed in Table 7-2 but as above recommend the consideration of including an additional measure to ensure that re-exposed cable(s) would be appropriately re-buried without hard engineering/protection.

### **Transboundary / cross border impacts**

We advise that there are unlikely to be any transboundary or cross border impacts in relation to impacts on marine physical processes.

Kirsty Black  
Marine Directorate – Licensing Operations Team  
By email: [kirsty.black@gov.scot](mailto:kirsty.black@gov.scot)

16 June 2023

Our ref: CEA170369

Dear Kirsty

## **SALAMANDER OFFSHORE WIND FARM – SCOPING REPORT – ONSHORE INFRASTRUCTURE**

Thank you for consulting us in relation to the energy balancing infrastructure associated with the Salamander Offshore Wind Farm. As the energy balancing infrastructure (which will include battery storage and other equipment) will be within the onshore substation area, and is part of the onshore development, our advice is in relation to all of the onshore infrastructure (landwards of mean low water springs). The energy balancing infrastructure on its own does not raise any significant concerns.

NatureScot has responded separately in relation to the offshore infrastructure (seawards of mean high water springs) on 5 May 2023.

### **Proposal**

Salamander Offshore Wind Farm has a total generating capacity of up to 100MW. The offshore export cables will make landfall north of Peterhead and will be installed by trenched or trenchless methods, or a combination of both. The main onshore infrastructure covered in the scoping report consists of:

- Cable transition joint bays;
- Onshore export cables;
- Onshore substation compound (including energy balancing infrastructure);
- Grid connection works; and
- Access road.

## Protected areas

Chapter 7 of the scoping report considers impacts of the offshore infrastructure on the marine physical environment. It is not clear if the onshore infrastructure (including the intertidal export cable corridor and the onshore export cable corridor) has been considered here. '*Changes to coastal landfall morphology*' should be scoped in for the onshore infrastructure and considered in the onshore physical environment chapter of the Environmental Impact Assessment (EIA). If hard engineering/protection of re-exposed cable(s) may be required in future, impacts on coastal morphology could arise. Therefore, potential impacts of trenched landfall cable(s) being re-exposed by future coastal change should also be scoped in.

The Loch of Strathbeg Site of Special Scientific Interest (SSSI) is approximately 5km north of the onshore scoping area. Consideration should be given to identifying this SSSI as a receptor as the nationally important coastal geomorphology and dependent habitats could be affected.

Figure 7-8 in the scoping report shows designated sites of relevance to marine physical processes and includes SSSIs and Geological Conservation Review sites (GCRs). It is not clear why SSSIs have not been included in the onshore physical environment chapter of the scoping report. Potential impacts to designated geological SSSIs and GCRs should be assessed in the EIA for the onshore infrastructure. Please note that most GCRs have statutory protection through designation as geological features in SSSIs.

## Protected species and biodiversity

We generally agree with the target habitats, species, survey methodologies and embedded mitigation set out in chapter 11 of the scoping report in relation to terrestrial ornithology and ecology. In carrying out survey work, any presence of invasive non-native species should be noted and any necessary mitigation described in the EIA.

## Landscape and visual

We consider the landscape and visual impacts of the proposal will be local in nature and as such we do not intend to comment further.

## Demonstrating positive effects for biodiversity

National Planning Framework 4 sets out new requirements for development to deliver positive effects, primarily under Policy 3. For national and major developments, or those subject to EIA, Policy 3b notes that proposals will only be supported where it can be demonstrated that it will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention. The policy requires that significant biodiversity enhancements are provided, in addition to any proposed mitigation. Only when actions result in biodiversity being left in a better state than before development are positive effects secured. Information on predicted losses and proposed offsetting and delivery of positive effects should be clearly summarised in the EIA.

These are new requirements and our guidance will be updated in due course, noting for example, that the Scottish Government is exploring options for measuring biodiversity specifically for use in Scotland.

**Other comments**

We advise that the EIA should explore fully any impacts arising from in-combination and cumulative effects with any other relevant plans or projects.

The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.

Yours sincerely,

Sophia Irvine  
Renewable Energy Casework Adviser/Operations Officer  
[sophia.irvine@nature.scot](mailto:sophia.irvine@nature.scot)



Network Rail

**From:** [Evie Porat](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** RE: SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 15 April 2023  
**Date:** 13 April 2023 09:39:37  
**Attachments:** [image001.png](#)  
[image002.png](#)

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OFFICIAL

Nil return



**Evie Porat**  
**Town Planning Technician**  
Property | Scotland's Railway  
Network Rail  
151 St Vincent Street, Glasgow, G2 5NW  
Tel: 07543314095  
[Evie.Porat@networkrail.co.uk](mailto:Evie.Porat@networkrail.co.uk)  
[www.networkrail.co.uk](http://www.networkrail.co.uk)

Please note, at Network Rail we work flexibly – so whilst it sometimes suits me to email out of normal working hours, I do not expect a response or action outside of your own working hours.

[Redacted]

# North Sea Transition Authority

**From:** [Stuart Walters \(North Sea Transition Authority\)](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** RE: SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 15 April 2023  
**Date:** 14 April 2023 15:33:45

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Good Afternoon,

The NSTA has reviewed the Scoping Report for the Salamander field and has a couple comments to relay:

- As noted in the Scoping Report there is potential for the export cable to interact with a number of active pipelines entering the St Fergus terminal, most likely appears to be the Fulmar A – St Fergus gas pipeline. The applicant should engage with pipeline owners about any interactions at the earliest possible point, this will allow the pipeline owners to approach the NSTA and OPRED to check what updates to existing pipeline consents may be required where interactions occur.
- The applicant should also be aware of interactions with blocks currently on offer as part of the Offshore Oil and Gas 33<sup>rd</sup> Licence Round, namely Block 19/15 which part of the windfarm application area is within. Applications are currently being reviewed by the NSTA and any potential interactions with planned windfarm developments are being discussed and addressed with Crown Estate Scotland. Awards from the Round are expected from Q3 2023.

Best Regards,

Stuart Walters | Senior Policy Manager – Energy Transition Policy | [Redacted]

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[Redacted]

# Northern Lighthouse Board



# Northern Lighthouse Board

84 George Street  
Edinburgh EH2 3DA

Tel: 0131 473 3100  
Fax: 0131 220 2093

Website: [www.nlb.org.uk](http://www.nlb.org.uk)  
Email: [enquiries@nlb.org.uk](mailto:enquiries@nlb.org.uk)

Your Ref: SCOP-0021  
Our Ref: AL/OPS/ML/O6\_26\_796

Ms Emma Lees  
Marine Licensing Casework Officer  
Marine Scotland – Marine Planning and Policy  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

21 March 2023

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)**

**REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)**

**REGULATIONS 2017 (collectively referred to as the “EIA Regulations”).**

**Request For Scoping opinion For Proposed Section 36 Application and Marine Licences For the Salamander Offshore Wind Farm Located 35 Kilometres East Of The Coast Of Peterhead**

Thank you for your e-mail correspondence dated 16<sup>th</sup> March 2023 relating to the Scoping Report submitted by **Simply Blue Energy (Scotland) Ltd** in relation to the proposed Salamander Offshore Wind Farm development located 35 kilometres (km) east of the coast of Peterhead.

Northern Lighthouse Board note the inclusion of Section 9.2 – Shipping and Navigation within the report, with particular reference to Table 9.5, detailing the Environmental Mitigation Measures proposed to ensure safety of navigation throughout the lifetime of the project. This includes the development of a Lighting and Marking Plan (LMP) and Navigational Safety Plan (NSP).

NLB also note the inclusion of Cumulative Effects (Section 9.2.8) within this chapter, and the factors upon which other cumulative projects will be screened in or out of the assessment.

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To find out more, please see our Privacy Notice at [www.nlb.org.uk/legal-notice/](http://www.nlb.org.uk/legal-notice/)

Ms E Lees  
SCOP-0021  
Pg. 2

NLB have no objection to the content of the Scoping Report, and no suggestions for additional content.

Yours sincerely  
[Redacted]

Peter Douglas  
Navigation Manager

NLB respects your privacy and is committed to protecting your personal data.  
To find out more, please see our Privacy Notice at [www.nlb.org.uk/legal-notices/](http://www.nlb.org.uk/legal-notices/)

Ofcom



**From:** [Spectrum Licensing](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** Ofcom case : 01585182 - EXTERNAL:SCOP-0021 - Salamander Offshore Wind Farm  
**Date:** 31 March 2023 12:05:29

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Classification: CONFIDENTIAL

Dear Emma,

**RE: Salamander Offshore Wind Farm**  
**REF: 2-576183**

Thank you for contacting Ofcom.

The windfarm process as originally developed was aimed at putting a windfarm developer and potentially impacted fixed link licensees in contact with each other.

Beyond this Ofcom did/does not have any further involvement or enter into the co-ordination / planning discussions between the concerned parties.

The same applies now that the fixed link licence information in the Ofcom managed and co-ordinated bands is provided via the Spectrum Information System. i.e. Ofcom does not enter into the discussions between windfarm and fixed link operators.

It should also be noted that while Ofcom provides information via the Spectrum Information System there are a number of bands that are now awarded on a block basis i.e. these bands are managed and assigned by the licensees themselves and the individual link information is not published on the SIS.

Further information on these bands and the licensees details can be found here:

<https://www.ofcom.org.uk/manage-your-licence/radiocommunication-licences/mobile-wireless-broadband/above-5ghz>

The location of published licences is located on the Wireless Telegraphy Register so you should perform your search there however not all fixed links masts are detailed on this service as above.

Wireless Telegraphy Register:

<https://www.ofcom.org.uk/spectrum/information/spectrum-info-faq/wtr#:~:text=The%20Wireless%20Telegraphy%20Act%20Register,the%20Wireless%20Telegraphy%20Act%202006>

If you have any further queries please do not hesitate to contact the Spectrum Licensing Team on 020 7981 3131 or via email at [spectrum.licensing@ofcom.org.uk](mailto:spectrum.licensing@ofcom.org.uk).

Kind regards,

**:: Ofcom**  
Spectrum Licensing  
PO Box 1285  
Warrington  
WA1 9GL  
[www.ofcom.org.uk](http://www.ofcom.org.uk)  
[www.ofcom.org.uk/licensing](http://www.ofcom.org.uk/licensing)

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<https://www.surveymonkey.co.uk/r/SpectrumLicensing>

# Office for Nuclear Regulation

**From:** [ONR Land Use Planning](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** ONR Land Use Planning - Application SCOP-0021  
**Date:** 21 March 2023 13:18:00

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Dear Sir/Madam,

With regard to planning application SCOP-0021, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.

You can find information concerning our Land Use Planning consultation process here: (<http://www.onr.org.uk/land-use-planning.htm>).

Kind regards,

Vicki Enston  
Land Use Planning  
Office for Nuclear Regulation  
[ONR-Land.Use-planning@onr.gov.uk](mailto:ONR-Land.Use-planning@onr.gov.uk)

[Redacted]

RYA Scotland

Royal Yachting Association Scotland

Caledonia House  
1 Redheughs Rigg  
South Gyle  
Edinburgh  
EH12 9DQ

T +44 (0)131 317 7388  
E [admin@ryascotland.org.uk](mailto:admin@ryascotland.org.uk)  
W [www.ryascotland.org.uk](http://www.ryascotland.org.uk)

27 March 2023

Emma Lees  
Marine Licensing Casework Officer  
Marine Scotland – Marine Planning and Policy  
Scottish Government  
Marine Laboratory,  
375 Victoria Road,  
Aberdeen,  
AB11 9DB  
[MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot)

Dear Emma,

## **Salamander Offshore Windfarm - Scoping Consultation**

I have read the relevant parts of the scoping report on behalf of RYA Scotland.

*Do you agree that all relevant legislation, policy and guidance documents have been identified for the shipping and navigation assessment, or are there any additional legislation, policy and guidance documents that should be considered?*

Yes.

*Do you agree with the study area defined for shipping and navigation?*

Yes.

*Do you agree with the data and information sources identified to inform the baseline for shipping and navigation including the planned vessel traffic surveys, or are there any additional data and information sources that should be considered?*

The data to be used for recreational craft are adequate. The requirements for MGN 654 will have to be met but no additional data are needed even though only a proportion of recreational vessels transmit an AIS signal and recreational vessels can be difficult to spot on radar. It should be assumed that a small number of vessels will pass through the site each year. Clearly Shipping and Navigation should be scoped in to the EIA. RYA Scotland would like to contribute to the Navigational Risk Assessment.

**Royal Yachting Association Scotland**

Caledonia House  
1 Redheughs Rigg  
South Gyle  
Edinburgh  
EH12 9DQ

T +44 (0)131 317 7388  
E [admin@ryascotland.org.uk](mailto:admin@ryascotland.org.uk)  
W [www.ryascotland.org.uk](http://www.ryascotland.org.uk)

*Do you agree with the suggested embedded mitigation measures?*

Yes. In addition to Kingfisher Bulletins, information should also be disseminated to harbours and marinas through Notices to Mariners. RYA Scotland would oppose the creation of unnecessary operational safety zones.

*Do you agree that all potential receptors and impacts have been identified for shipping and navigation?*

An additional risk is the failure of Aids to Navigation marking the devices. There have been several cases where lights or AIS transmissions have failed on wind farms off the coast of Scotland in recent months and it has taken several days to replace them due to adverse weather. Mitigation might include the use of virtual AtNs.

*Do you agree that the impacts proposed can be scoped out of [sic] the shipping and navigation EIA chapter?*

The impacts listed in Table 9-6 as well as the additional one mentioned above should be scoped in.

*Do you agree with the approach for cumulative effects assessment and transboundary impacts?*

Yes. Since the level of stakeholder concern is one of the criteria for assessing whether a marine activity should be included in the cumulative effects assessment it is a little surprising that a list of candidate projects has not been included.

*Do you agree with the proposed assessment approach and list of planned consultees*

Yes. However, RYA should be RYA Scotland.

Yours sincerely,

[Redacted]

Dr G. Russell FCIEEM(retd) FRMetS  
Planning and Environment Officer, RYA Scotland

RSPB Scotland

Marine Scotland Licensing Operations Team  
Marine Scotland  
By email: [MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot)



24<sup>th</sup> April 2023

Dear Emma

**REQUEST FOR SCOPING OPINION AND COMMENTS ON HABITATS REGULATIONS APPRAISAL SCREENING  
REPORT FOR PROPOSED SECTION 36 AND MARINE LICENCE APPLICATION FOR THE SALAMANDER  
OFFSHORE WIND FARM LOCATED 35 KILOMETRES EAST OFF THE COAST OF PETERHEAD**

Thank you for consulting RSPB Scotland on the above proposed 'INTOG' innovation project. We understand it would have a lifetime of 35 years, an installed capacity of up to 100 MW and would comprise up to seven offshore floating turbines with maximum rotor diameter of 265 meters, maximum blade tip height above lowest astronomic tide (LAT) of 325 meters and minimum blade clearance above LAT of 22 meters. There would also be a network of inter-array, export cables, and associated infrastructure to operate and maintain the windfarm. The offshore export cable would make landfall at Peterhead and number of onshore components, including Energy Balancing Infrastructure containing battery storage would also be required. We also note the proposed location falls both outside the INTOG exclusion zone and areas of search.

**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 suggest this is clearly labelled.

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**RSPB Scotland Headquarters**  
2 Lochside View  
Edinburgh Park  
Edinburgh  
EH12 9DH

Tel: 0131 317 4100  
Facebook: @RSPBScotland  
Twitter: @RSPBScotland  
[rspb.org.uk](http://rspb.org.uk)



The RSPB is part of BirdLife International, a Partnership of conservation organisations working to give nature a home around the world.



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.

The precautionary principle requires the Applicant to demonstrate with scientific certainty that something would not be harmful. The concept of something being overly precautionary dismisses the inherent uncertainty in modelling and overlooks the simplistic version of reality that the modelling captures.

### **Bio-seasons for Kittiwake and Gannet**

The RSPB has outstanding issues with the manner in which the bio-seasons definitions from Furness (2015)<sup>2</sup> 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

### **Foraging Ranges for Common Guillemot and Razorbill**

We welcome using foraging ranges as published in Woodward *et al.* (2019)<sup>3</sup> 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.

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

---

<sup>1</sup> Searle, K. R., O'Brien, S. H., Jones, E. L., Cook, A. S. C. P., Trinder, M. N., McGregor, R. M., Donovan, C., McCluskie, A., Daunt, F., and Butler, A., 2023. *A framework for improving treatment of uncertainty in offshore wind assessments for protected marine birds*, ICES Journal of Marine Science, 2023;, fsad025, <https://doi.org/10.1093/icesjms/fsad025>

<sup>2</sup> Furness, R.W. (2015) Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS). Natural England Commissioned Reports, Number 16

<sup>3</sup> Woodward, I., Thaxter, C.B., Owen, E. and Cook, A.S.C.P. (2019). Desk-based revision of seabird foraging ranges used for HRA screening. BTO Research Report No. 724, British Trust for Ornithology, Thetford. ISBN 978-1-912642-12-0.

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**RSPB Scotland Headquarters**  
2 Lochside View  
Edinburgh Park  
Edinburgh  
EH12 9DH

Tel: 0131 317 4100  
Facebook: @RSPBScotland  
Twitter: @RSPBScotland  
[rspb.org.uk](https://www.rspb.org.uk)



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Northern Isles), we advise use of mean max (MM) plus one standard deviation (SD) discounting Fair Isle values. For clarity, North Caithness Cliffs SPA is considered to lie south of the Pentland Firth.

|                  | All Northern Isle SPAs | All sites south of Pentland Firth |
|------------------|------------------------|-----------------------------------|
| Common guillemot | 153.7 MM+SD            | 95.2 MM+SD                        |
| Razorbill        | 164.6 MM+SD            | 122.2 MM+SD                       |

In the non-breeding season, seabirds are not constrained by colony location and can, depending on individual species, range widely within UK seas and beyond.

## Gannet

Whilst the RSPB agree with the majority of the NatureScot advised Avoidance Rates including the use of a 98.9% avoidance rate for non-breeding gannets, in our opinion, a 98% avoidance rate is more appropriate for breeding gannets. This is because the figures used for the calculation of avoidance rates advocated by the SNCBs are largely derived from the non-breeding season for gannet. During the breeding season, gannets are constrained to act as central placed foragers meaning they return to the colony after feeding in order to maintain territories, incubate eggs and provide for chicks. Once chicks have fledged adult gannets remain at sea and no longer visit the colony. Differences in behaviour between the breeding and non-breeding season are likely to result in changes in avoidance behaviour.

This seasonally defined change in reactive behaviour will also be reflected in the distributional changes occurring due to the presence of turbines. As such, alongside the 70% displacement rate recommended by NatureScot for the assessment of gannet, we recommend the presentation of 60% displacement rate during the breeding season.

## EIA Assessment of Significance

An EIA report must include a description of the likely significant effects of the development on the environment. RSPB are frequently presented with a matrix approach to significance which combines the value of a receptor with the magnitude of impacts. This formulaic approach is one way to present significance, but the categorisation is not biologically meaningful and may not be the best way to assess the significance of impacts. Furthermore, the uncertainty in the score, as described by Wade *et al.*, (2016) is typically not incorporated into this approach. This should be case, and we would recommend doing so following the principal that the greater the uncertainty the greater the need for precaution (Searle *et al.*, 2023)

When assessing significance, it is particularly relevant that:

- Seabirds are relatively long-lived, take longer to reach breeding age than most other birds and have just one or two young per year. As a result, their populations are sensitive to small increases in adult mortality.

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RSPB Scotland Headquarters  
2 Lochside View  
Edinburgh Park  
Edinburgh  
EH12 9DH

Tel: 0131 317 4100  
Facebook: @RSPBScotland  
Twitter: @RSPBScotland  
rspb.org.uk



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- NatureScot’s latest assessment of 11 Scottish breeding seabird species show that numbers fell by nearly half (49%) between 1986 and 2019<sup>4</sup>.
- Governments of the UK have collectively failed to meet 11 out of the 15 indicators of Good Environmental Status (GES) for our seas as required under the Marine Strategy Regulations 2010. The marine birds indicator is moving away from target. For breeding seabirds, more species are now experiencing frequent, widespread breeding failures<sup>5</sup>.
- Black-legged Kittiwake and Atlantic Puffin are red listed on the Birds of Conservation Concern and have been assessed by the IUCN as vulnerable to global extinction.
- The growth of offshore wind is placing great cumulative pressure on seabird colonies.

RSPB Scotland disagree with the magnitude of impact being assessed in terms of predicted increases to baseline mortality. As above, small increases in mortality can have large impacts. It is more meaningful to view impacts across the lifeline of the development in comparison to population size in the absence of the development and consider long-term viability of colonies and time for recovery.

### EIA Non-technical Summary

RSPB Scotland advocate for the planning and consenting process to be accessible. In relation to ornithology, the EIA will contain complex statistical models, the output of which is not readily understood by a lay person. A non-technical summary (NTS) is therefore vital to set out the main findings of the EIA report in an accessible way and in plain English so that it is easily understood by the public. It should not just describe the process but also clearly present information (to the specifications of the scoping opinion) with interpretation and explanation with clear figures, maps, and tables as necessary. It should not hide any key messages of the EIA by over-summarising or averaging out findings.

The ornithological section of the NTS should clearly explain what is meant by ‘significant’ in an ornithological context. It should provide direction to the reader of where in the EIA Report to find information on how the sensitivity of the receptor was assessed and how the magnitude of potential impacts was calculated. If magnitude of impact has been related to a specific element or elements (for example time to recovery following cessation of project or alteration of the long-term viability of the population) this should be made clear.

We recommend the NTS contains clear information on how the mitigation hierarchy has been followed. The mitigation hierarchy requires that:

- Adverse impacts should firstly be avoided as far as possible;
- Any remaining adverse impacts should then be minimised or reduced to as low as practical; and

<sup>4</sup> [Scottish Biodiversity Indicator – The Numbers and Breeding Success of Seabirds \(1986 to 2019\) | NatureScot](#)

<sup>5</sup> CEFAS Marine Assessment Tool – Marine Breeding Bird Success <https://moat.cefas.co.uk/biodiversity-food-webs-and-marine-protected-areas/birds/breeding-successfailure/>

**RSPB Scotland Headquarters**  
2 Lochside View  
Edinburgh Park  
Edinburgh  
EH12 9DH

Tel: 0131 317 4100  
Facebook: @RSPBScotland  
Twitter: @RSPBScotland  
rspb.org.uk



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- For residual adverse impacts which are both unavailable and cannot be reduced further, measures to remedy or offset the impacts should be included within the application.

To make the NTS informative, we welcome the use of short summary tables. We suggest a series of tables are used to present the following information:

- Annual mortality for relevant species using the methods set out in the scoping opinion for the development in isolation
- Annual mortality for relevant species using the methods set out in the scoping opinion for the development in cumulation with impacts arising from any existing or approved development
- Predicted population size of relevant SPA colonies after the lifetime of the proposed development using the methods set out in the scoping opinion presented and as a percentage (min-max) of what it would have been in the absence of the proposed development
- Predicted population size of relevant SPA colonies after the lifetime of the proposed development and other relevant developments (i.e in cumulation) using the methods set out in the scoping opinion and presented as a percentage (min-max) of what it would have been in the absence of the proposed development

### Screening for Likely Significance Effects

The test of Likely Significant Effect (LSE) is a simple screening stage to determine whether or not an appropriate assessment is required. Each qualifying interest must be considered in relation to their conservation objectives. We agree with the overarching conclusion of potential for LSE in relation to ornithological features.

An assessment to determine the implications of a plan or project on the identified European sites in view of that site's conservation objectives is therefore required. This must consider impacts from the development alone as well as in combination with those from other plans and projects.

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

Yours sincerely,

*Catherine Kelham*

Senior Marine Conservation Planner  
RSPB Scotland

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**RSPB Scotland Headquarters**  
2 Lochside View  
Edinburgh Park  
Edinburgh  
EH12 9DH

Tel: 0131 317 4100  
Facebook: @RSPBScotland  
Twitter: @RSPBScotland  
rspb.org.uk



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# Scottish Fire and Rescue Service

**From:** [McIntyre, Sheona](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** SFRS: Salamander Offshore Wind Farm  
**Date:** 03 April 2023 09:49:34  
**Attachments:** [image001.png](#)

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Hello,

I had been forwarded an email from a colleague on the Scoping Report for Salamander Offshore Wind Farm, I have reviewed the document and believe we have no comments to make on the document.

Thank you for including and all the best.

Many Thanks  
Sheona

**Sheona McIntyre**, Environment Officer, Scottish Fire and Rescue Service  
[Redacted] E: [Sheona.McIntyre@firescotland.gov.uk](mailto:Sheona.McIntyre@firescotland.gov.uk)



I'm 'Stepping up for the planet' with SFRS

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Scottish Water

Friday, 17 March 2023



Marine Licensing  
375 Victoria Road

Aberdeen

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

Development Operations  
Freephone Number - 0800 3890379  
E-Mail - [DevelopmentOperations@scottishwater.co.uk](mailto:DevelopmentOperations@scottishwater.co.uk)  
[www.scottishwater.co.uk](http://www.scottishwater.co.uk)



Dear Customer,

**Salamander Offshore Wind Farm, 35 KILOMETRES EAST OFF THE COAST OF, PETERHEAD, AB43 8YP**

**Planning Ref:**

**Our Ref: DSCAS-0083193-2CL**

**Proposal: REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION AND MARINE LICENCES FOR THE SALAMANDER OFFSHORE WIND FARM LOCATED 35 KILOMETRES EAST OFF THE COAST OF PETERHEAD**

**Please quote our reference in all future correspondence**

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### **Audit of Proposal**

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

### **Drinking Water Protected Areas**

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

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

Yours sincerely,

**Ruth Kerr**

Development Operations Analyst

Tel: 0800 389 0379

[developmentoperations@scottishwater.co.uk](mailto:developmentoperations@scottishwater.co.uk)

### **Scottish Water Disclaimer:**

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

# Scottish Rights of Way and Access Society

**From:** [Eleisha Fahy](#)  
**To:** [MS Marine Renewables](#)  
**Cc:** [Lynda Grant](#)  
**Subject:** FW: SCOP-0021 - Salamander Offshore WF - Scoping consultation - Respond by 15Apr2023 [08168]  
**Date:** 14 April 2023 11:42:31

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Further apologies Emma, I clearly wrote in too much haste being mindful of that impending deadline. I now see that this scoping consultation relates solely to offshore aspects of this proposed windfarm, so can confirm that we have no comments to make at this stage.

I can also confirm that ScotWays will want to be consulted regarding the scoping opinion relative to the remaining onshore infrastructure elements, so we look forward to hearing from Aberdeenshire Council in due course.

Kind regards,  
Eleisha

Eleisha Fahy  
Senior Access Officer  
Scottish Rights of Way and Access Society (ScotWays)

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Scottish Environment Protection Agency

**From:** [Planning.North](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** FW: SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 15 April 2023  
**Date:** 22 March 2023 14:32:00

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## OFFICIAL

Thank you for your consultation below. We understand that that this consultation request relates to the proposed section 36 application and marine licence applications for the offshore infrastructure elements with the inclusion of the energy balancing infrastructure to be included within the onshore infrastructure. Please refer to SEPA's standing advice as outlined below.

### **Offshore Infrastructure Elements**

Please refer to [SEPA Standing Advice for Marine Scotland on marine consultations](#) and the extracts as below.

#### **Marine Scotland**

- 2.2 *Please do not routinely consult SEPA directly on any applications which are purely within the marine environment, including at any stage of EIA or repeat consultations. Please consider our standing advice in Section 3 and Table 1 as SEPA's views and consultation response, where relevant.*
- 2.3 *Notwithstanding the advice above, should there be a development proposal of potentially significant impact on aspects of the environment directly regulated by SEPA which is not dealt with adequately by our standing advice or is novel or unusual, then please do consult us specifying exactly the aspect of the environment regulated by SEPA on which advice is sought.*

#### **Section 3 Advice for Marine Scotland**

##### **Standing advice**

***For all matters covered by the below advice, SEPA has not assessed the application, has no site-specific comments to make and, where relevant, does not consider EIA is required from our perspective.***

##### **Bathing Waters**

*Any operation should be cross checked to see if the proposed site is in or adjacent to a designated bathing water (within 2 km). If so, all physical operations should be done outwith the Bathing Water Season (1 June to 15 September).*

*If works to be done within Bathing Water Season, a strong case should be made as to why a particular operation would not present a risk to Bathing Waters.*

*Please refer to the Bathing waters section of our website [www2.sepa.org.uk/bathingwaters/](http://www2.sepa.org.uk/bathingwaters/) for further guidance on the Bathing Waters Directive (2006/7/EC).*

##### **Pollution prevention**

*Many operations could potentially give rise to risk of pollution through silt mobilisation, silt suspension or chemical or oil spillages. To prevent pollution and safeguard marine ecology interests it is vital that good working practice is adopted, and appropriate steps taken to prevent water pollution and minimise disturbance to sensitive receptors. Measures need to be in place to*

*minimise the release of sediment plumes and to contain and prevent construction and waste materials e.g., paint from falling from a structure into the water body beneath. Where appropriate, mitigation measures should be sought within method statements and onsite compliance should be confirmed through site visits.*

*Please refer to [gpp-5-works-and-maintenance-in-or-near-water.pdf](https://netregs.org.uk/gpp-5-works-and-maintenance-in-or-near-water.pdf) (netregs.org.uk). This includes working with concrete, cement and grout.*

*SEPA has no objection to the release of sediment tracing material into the water environment for the undertaking of a dispersion study (e.g. for aquaculture or septic tank flows). However, we strongly recommend the use of biodegradable material. We do not consider the use of non-biodegradable products (e.g. microplastic beads) to be the best environmental option.*

### **On-shore works and restoration**

*With regard to works on the shoreline, the applicant should refer to the appropriate sections in the Guidance for Pollution Prevention (GPPs) and CIRIA Guidance, in particular C744 Coastal and marine environmental site guide. 2nd edition, 2015 CIRIA. Disturbance to the shoreline should be minimised and the shore restored to as near its former condition following the works as reasonably possible on completion of the works. SEPA recommends that new infrastructure, including sea outfalls (including septic tank outfalls), be buried where possible and redundant structures and materials be removed.*

*Please refer to [CAR\\_a\\_practical\\_guide.pdf](https://sepa.org.uk/CAR_a_practical_guide.pdf) (sepa.org.uk) for a guide to The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) including an overview; definitions of the regimes; levels of authorisation and the General Binding Rules.*

*The developer should consider if waste deposition could constitute landfill and should therefore be subject to authorisation under PPC and should comply with all relevant environmental legislation and to check our website at [www.sepa.org.uk/regulations/](http://www.sepa.org.uk/regulations/) and contact SEPA via the online form with any site-specific issues. Where appropriate, any waste materials should be removed and disposed of at a licensed onshore site.*

### **Dredge spoil**

*Dredged material should be disposed of at an offshore sea disposal site and that work must be carried out in line with best dredging practices. Material should be deposited on the beach below MHWS and allowed to disperse naturally. If any dredged material accumulates above MHWS, disposal operations must cease until the material has dispersed.*

### **Waste material (includes dredge spoil) above the low water mark**

*Waste material, which includes dredge spoil, deposited above the low water mark is subject to Waste Management Licensing controls regulated by SEPA unless it is subject to a licence issued under Part 4 of the Marine (Scotland) Act 2010 (which can extend to Mean High Water Spring Tide including within estuaries, rivers and channels), in which case it is excluded from such controls. However, if the waste deposition could constitute a landfill, then PPC not Waste Management Licensing would apply, and in this situation no Marine Licence exclusion is provided for.*

*Where dredge spoil is used for land reclamation works or harbour works then the method of construction will determine how the activity is regulated. If the works are carried out by way of*

*deposit of material directly onto the intertidal zone or within a permeable bunded area (for example a bund made of placed stones) then the works will be considered to be occurring in the marine environment and will be regulated by Marine Scotland. If the works are constructed by way of initially creating an impermeable bund (such as a sheet piled metal wall) then the use of waste such as dredge spoil for infill works will be considered to be occurring above mean high water springs and therefore will be controlled by SEPA. Such works would require either a waste management licence or a waste management exemption.*

*The applicant should consult the local SEPA Regulatory Services team (see contact sheet for details) for advice on whether or not the proposed waste deposition would constitute a landfill and hence fall within PPC regulation, including for the controlled placement of dredged sands from harbours onto adjacent beaches and/or seabed.*

### **Decommissioning**

*While MS-LOT consult on Marine Licence applications for decommissioning, the applicant will consult themselves on the Decommissioning Programme (as per Energy Act 2004) required to be submitted as part of the s.36/Marine Licences issued for renewables construction. SEPA does not require to be consulted and will provide no comments on the Decommissioning Programme.*

*Please ensure that conditions cover decommissioning where appropriate and the removal of all devices and as much of the support infrastructure/cabling is removed and all waste materials are removed and reused, recycled or disposed of at a licensed onshore site.*

### **Onshore Substation (OnSS), that includes Energy Balancing Infrastructure (EBI) containing battery storage**

Please refer to [sepa-triage-framework-and-standing-advice.pdf](#) – and within it Table 2: Standing advice for planning authorities

Regards  
Clare

**Clare Pritchett**  
Senior Planning Officer  
Planning Service, SEPA  
Email: [planning.north@sepa.org.uk](mailto:planning.north@sepa.org.uk)

Part Time: Tuesday, Wednesday & Thursday

#### *Disclaimer*

*This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising.*

*We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information.*

*If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).*

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*Registered office: SEPA, Angus Smith Building, 6 Parklands Avenue, Eurocentral, Holytown, North Lanarkshire, ML1 4WQ*

# Scottish Fishermen's Federation





Our Ref: FH/28/04

Your Ref:

28 April 2023

E-mail:

Scottish Fishermen's Federation  
24 Rubislaw Terrace  
Aberdeen, AB10 1XE  
Scotland UK

T: +44 (0) 1224 646944  
E: [sff@sff.co.uk](mailto:sff@sff.co.uk)

[www.sff.co.uk](http://www.sff.co.uk)

### **Salamander Wind Farm Ltd Request on EIA Scoping**

This response to the scoping request is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association, Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association. The chair of NECrIFG has also been consulted.

Page 18, of the report notes that "There is now no offshore substation planned as part of the Project, and that is therefore not considered further within the Scoping Report."

In any case, if there are no offshore substations page 32 tell us that there will be subsea hub(s) and/or joint(s); therefore, they need to be scoped.

P23, of the report notes that the northerly route to the Acorn project at St Fergus Gas Terminal (Option 3, Figure 3-2) was ruled out as the small gap between a patch of Annex 1 reef and the active Fulmar to St Fergus gas pipeline is approximately 250 m. Including required space for trenching the export cable, the minimum separation needed between pipeline and cable was considered to be 170 m; running a high voltage cable close to a gas pipeline can pose a threat as the pipeline could be subject to electrical interference. The nominal distance from the cable corridor to the Annex 1 reef was therefore approximately 70 m and considered a technical and environmental risk to be avoided.

If this is the case for pipeline, therefore the SFF expect the EMF effects of the High Voltage Cables on fish and fish habitats to be scoped in.

Pp34 &35, para "4.4.2 Floating Substructures", states that there are a large number of floating substructures under development, which can be classified into three main categories namely, spar, tension-leg platform (TLP), and semi-submersible and barge (which have been combined into a single category). The Project will use either semi-submersible/barge or TLP floating substructure, as

Members:

Anglo Scottish Fishermen's Association · Fife Fishermen's Association · Fishing Vessel Agents & Owners Association (Scotland) Ltd ·  
Mallaig & North-West Fishermen's Association Ltd · Orkney Fisheries Association · Scottish Pelagic Fishermen's Association Ltd ·  
The Scottish White Fish Producers' Association Ltd · Shetland Fishermen's Association

VAT Reg No: 605 096 748

the water depths within the Offshore Array Area are not suitable for the use of spar structures with the Project's intended WTG design envelope.

P38, "4.4.3 Mooring and Anchoring", Figure 4-4 exhibits the overview of mooring configurations and introduces four types of moorings, however, it is stated that the Project may use either taut, catenary or semi-taut moorings, depending on the specifics of the chosen floating substructure, anchor type and the seabed and metocean conditions onsite.

Page 39, para 4.4.3, states that the Project may use one or a combination of the following anchor types: drag-embedment, vertical load, pile (including drilled micro-piles), suction or gravity.

Considering the spatial footprint of floating substructure, SFF prefers TLP to be used instead of semi-submersible and barge. Given that the development cannot say which mooring and anchor system they choose all of them must be scoped in.

P41, para "4.4.4 Offshore Cables", the report states that the Project may choose to trench and/or bury the portions of the cable running along the seabed for their protection. The burial method and target burial depth will be defined post consent based on a Cable Burial Risk Assessment (CBRA) (or similar) considering ground conditions as well as the potential for impacts upon cables such as from trawling and vessel anchors. The report adds that the burial depths are typically 1 – 2 m, with a maximum of up to 4 m locally; this will vary across the Project array area and offshore cable corridor. In addition, while crossing other ECC or pipeline, it should be ensured that no snagging hazard is created for the fishing vessels.

SFF, to ensure the safety of fishing vessels and prevention of the ECC EMF effects on marine environment, expect the total burial of the cables and a CBRA should be prepared and agreed pre-consent. Furthermore, SFF expect that an agreed over trawl on the ECC is carried out as soon as possible post burial to ensure safety of fishing vessels and cables.

In addition, the EMF effects of dynamic cable are not known, SFF expect the EMF effects of these dynamic cables are scoped in and monitored.

P47, para "4.6 Construction Activities", indicates the construction period will last for almost 3 years. SFF recommend that in case construction sites lapse with fish spawning and nursery areas, it should be made sure that construction activities are carried out outwith the spawning and nursery seasons to prevent any disruption and/or damage fish spawning and nursery.

P49, para "4.6.4 Offshore Cables", states that if required, identified obstacles such as boulders, unexploded ordnance (UXO) and discarded fishing gear will be removed pre-construction and during construction along the proposed cable route.

SFF is content with the removal of obstacles such as UXO and discarded fishing gear to shore; however, in terms of boulders it is recommended that utmost effort should be made to not displace boulders. Displaced/relocated boulders creates snagging hazard for the fishing vessels and disturbs the marine environment. If displacement of boulders is the last resort for cable burial, it is recommended that the new location of the boulders is recorded and shared with SFF/fishing industry via USB flash sticks. In addition, if further large-scale boulders are identified during the survey work, SFF would like to know their location the same manner as the relocated boulders.

P59, “4.8.1 Floating Assembly”, indicates that where piled anchors have been used these would likely be cut approximately 1 m below the seabed, with due consideration made of likely changes in seabed level and only the upper section removed. At this point in time, it is not thought to be reasonably practicable to remove entire piles from the seabed, but endeavours will be made to ensure that the sections of pile that remain in the seabed are fully buried.

SFF, taking the nature of the seabed soil into account, SFF would hope to see them cut out as deep as possible and fully buried in to mitigate any possible scour and snagging hazard happening.

P60, para “4.8.2 Offshore Cables”, states that during the decommissioning should full cable removal not be desired, an alternative option is to leave cables buried in place with the cable ends cut, sealed and securely buried as a precautionary measure. In addition, the current Project assumption is that offshore cable rock protection will be left *in situ*.

SFF is not content with leaving cable rock protection in situ and would prefer full removal of cable and rock where possible. However, SFF will be content with leaving the trenched and buried cable in situ if cable ends properly cut, sealed and securely buried. The SFF would reiterate the desire for clean seabed returned to as pre-development upon decommissioning, especially the rock protections.

Furthermore, SFF expect the developer to commit/accept responsibility for the long-term monitoring of anything left in seabed post decommissioning to ensure safety of fishing vessels.

## 4 Project Description

### 4.9 Scoping Questions

• **Do you consider the design envelope parameters presented within Table 4-1 to be appropriate at EIA Scoping?**

Answer: No specific comment because the final design is not handy.

• **Do you consider the design envelope parameters presented within Table 4-2 to be appropriate at EIA Scoping?**

Answer: Yes.

• **Do you consider the design envelope parameters presented within Table 4-3 to be appropriate at EIA Scoping?**

Answer: Yes.

• **Do you consider the design envelope parameters presented within Table 4-4 to be appropriate at EIA Scoping?**

Answer: No. SFF will not be content with using concrete mattress on ECC protection in open sea. SFF want to see the scoping of the cables where they are not buried.

• **Do you consider the design envelope parameters presented within Table 4-5 to be appropriate at EIA Scoping?**

Answer: No. SFF strongly need the subsea hubs and joints scoped in to understand the possible impacts.

• **Do you consider the design envelope parameters presented within Table 4-6 to be appropriate at EIA Scoping?**

Answer: No specific comment.

• **Do you consider the design envelope parameters presented within Table 4-7 to be appropriate at EIA Scoping?**

Answer: No specific comment.

P77, para “6.6.1 Consideration of Human Health”, accepts that the Project will interact with human health in relation to noise, air quality, visual, transport and socio-economics.

SFF consider the possibility that the project will negatively impact the local fishermen in terms of employment and income source. There is the chance that this will badly impact the education, lifestyle, and community identity of them. Therefore, SFF would want to see these scoped in in order to understand any possible negative impacts.

P123, “Table 8-3 Potential impacts on benthic ecology during construction/ decommissioning, operations and maintenance phases of the Project, the “Impact to habitats or species as a result of pollution or accidental discharge”, has been scoped out.

SFF believe that the “Impact to habitats or species as a result of pollution or accidental discharge” during operation and maintenance should be scoped in and monitored.

## **8.1 Benthic Ecology**

### **8.1.11 Scoping Questions**

• **Do you agree that all relevant legislation, policy and guidance documents have been identified for the benthic ecology assessment, or are there any additional legislation, policy and guidance documents that should be considered?**

Answer: No specific comment.

• **Do you agree with the study area defined for benthic ecology?**

Answer: No specific comment.

• **Do you agree with the data and information sources identified to inform the baseline for benthic ecology, or are there any additional data and information sources that should be considered?**

Answer: No specific comment.

• **Do you agree with the suggested embedded mitigation measures?**

Answer: No. Experience tells us that post consent is too late to agree much of the mitigation; therefore, it needs to be agreed pre-consent.

• **Do you agree that all potential receptors and impacts have been identified for benthic ecology?**

Answer: No. SFF believe that the “Impact to habitats or species as a result of pollution or accidental discharge” during operation and maintenance should be scoped in and monitored. Boulders displacement should also be scoped in.

• **Do you agree that the impacts proposed can be scoped out of the benthic ecology EIA chapter?**

Answer: No. As above.

• **Do you agree with the approach for cumulative effects assessment and transboundary impacts?**

Answer: No. The developers will be able to deduce the size and impacts of all ScotWind projects and they could scope in the worst case scenario.

- **Do you agree with the approach to analysis and assessment that will inform the EIA?**

Answer: No specific comment.

## **8.2 Fish and Shellfish Ecology**

### **8.2.11 Scoping Questions**

- **Do you agree that all relevant legislation, policy and guidance documents have been identified for the fish and shellfish ecology assessment, or are there any additional legislation, policy and guidance documents that should be considered?**

Answer: No specific comment.

- **Do you agree with the study area defined for fish and shellfish ecology?**

Answer: Yes.

- **Do you agree with the data and information sources identified to inform the baseline for fish and shellfish ecology, or are there any additional data and information sources that should be considered?**

Answer: No. Initial discussion was held with SFF & SWFPA and we remain available to provide further information.

- **Do you agree with the suggested embedded mitigation measures?**

Answer: No. Experience tells us that post consent is too late to agree much of the mitigation; therefore, it needs to be agreed pre-consent.

- **Do you agree that all potential receptors and impacts have been identified for fish and shellfish ecology?**

Answer: Yes.

- **Do you agree that the impacts proposed can be scoped out of the fish and shellfish ecology EIA chapter?**

Answer: No. Following should also be scoped in since they have potential of affecting marine environment and ecology.

1. Impact to habitats or species as a result of pollution or accidental discharge

2. Barrier effects on migratory fish from the presence of the floating platform and associated infrastructure

- **Do you agree with the approach for cumulative effects assessment and transboundary impacts?**

Answer: No. The developers will be able to deduce the size and impacts of all ScotWind projects and they could scope in the worst-case scenario.

- **Do you agree with the proposed list of consultees or are there any other organisations that should be consulted?**

Answer: No. The NECrIFG should also be included.

- **Do you agree with the approach to analysis and assessment that will inform the EIA?**

Answer: No specific comment.

## 9.1 Commercial Fisheries

### 9.1.11 Scoping Questions

• **Do you agree that all relevant legislation, policy and guidance documents have been identified for the commercial fisheries assessment, or are there any additional legislation, policy and guidance documents that should be considered?**

Answer: No specific comment.

• **Do you agree with the study area defined for commercial fisheries?**

Answer: Yes.

• **Do you agree with the data and information sources identified to inform the baseline for commercial fisheries, or are there any additional data and information sources that should be considered?**

Answer: Yes. Based on initial discussion, SWFPA had shared screen shot of fishing plotter data. SFF & SWFPA will remain available to provide further information.

• **Do you agree with the suggested embedded mitigation measures?**

Answer: No. Experience tells us that post consent is too late to agree much of the mitigation; therefore, it needs to be agreed pre-consent.

• **Do you agree that all potential receptors and impacts have been identified for commercial fisheries?**

Answer: Yes. The SFF would expect to see the baseline for commercial fishery in place in order to monitor the impact for the life-time of the project.

• **Do you agree with the approach for cumulative effects assessment and transboundary impacts?**

Answer: No. The developers will be able to deduce the size and impacts of all ScotWind projects and they could scope in the worst-case scenario.

• **Do you agree with the approach to analysis and assessment that will inform the EIA?**

Answer: No specific comment.

## 9.7 Socio-Economics

### 9.7.11 Scoping Questions

• **Do you agree that all relevant legislation, policy and guidance documents have been identified for the socio-economics assessment, or are there any additional legislation, policy and guidance documents that should be considered?**

Answer: No specific comment.

• **Do you agree with the study areas defined for socio-economics?**

Answer: Yes.

• **Do you agree with the data and information sources identified to inform the baseline for socioeconomics, or are there any additional data and information sources that should be considered?**

Answer: No specific comment.

• **Do you agree with the suggested embedded mitigation measures?**

Answer: No. Experience tells us that post consent is too late to agree much of the mitigation; therefore, it needs to be agreed pre-consent.

In addition, the SFF realise the fact that project may have negative impact on commercial fisheries; therefore, simply to say “the new jobs” is not enough. SFF would expect to see the development scoping where the new jobs are created and ensure that they do not replace fishing jobs.

• **Do you agree that all potential receptors and impacts have been identified for socio-economics?**

Answer: No. For the SFF it is recognised that for every job offshore there are five jobs ashore which has not been considered here.

• **Do you agree that the impacts proposed can be scoped out of the socio-economics EIA chapter?**

Answer: No. SFF recommends that the “Socio-cultural effects” and “Distributional effects” to be scoped in since the development will have impacts on both them.

• **Do you agree with the approach for cumulative effects assessment and transboundary impacts?**

Answer: No. The developers will be able to deduce the size and impacts of all ScotWind projects and they could scope in the worst-case scenario.

• **Do you agree with the approach to analysis and assessment that will inform the EIA?**

Answer: No specific comment.

## 9.8 Offshore Air Quality, Airborne Noise, and Vibration

### 9.8.10 Scoping Questions

• **Do you agree that all relevant legislation, policy and guidance documents have been identified for the offshore air quality, airborne noise and vibration assessment, or are there any additional legislation, policy and guidance documents that should be considered?**

Answer: No specific comment.

• **Do you agree with the study areas defined for offshore air quality, airborne noise and vibration?**

Answer: No. SFF expect to see the waterborne, seaborne and wake effects scoped in.

• **Do you agree with the data and information sources identified to inform the baseline for offshore air quality, airborne noise and vibration, or are there any additional data and information sources that should be considered?**

Answer: No. SFF expects to see more scientific studies on waterborne, seaborne and wake effects.

• **Do you agree with the suggested embedded mitigation measures?**

Answer: No. SFF expects to see more scientific studies on waterborne, seaborne and wake effects. In addition, experience tells us that post consent is too late to agree much of the mitigation; therefore, it needs to be agreed pre-consent.

• **Do you agree that all potential receptors and impacts have been identified for offshore air quality, airborne noise and vibration?**

Answer: No. SFF expects to see more scientific studies on waterborne, seaborne and wake effects.

• **Do you agree with the scoping out of all potential impacts (including cumulative and transboundary) associated with offshore air quality, airborne noise, and vibration?**

Answer: No. Considering the noise effects of construction and decommissioning works on marine life, SFF recommend the followings should be scoped in:

1. Piling activities generating airborne noise/vibration that may impact other marine users
2. Cable installation activities generating noise/vibration that may impact marine users and onshore human/ecological receptors.
3. Operation of WTGs producing airborne noise/vibration.

**Sound effects on fish:**

As the report indicates that a number of species within the vicinity of the Offshore Development Area, specifically cod and herring, are sensitive to the impacts of underwater noise from activities in relation to offshore construction. Sound pressures and particle motion have exaggerated impacts on the swim bladder of these species which is closely connected to the ear and show a more extended sound frequency range of up to 500 MHz (Popper and Hawkins, 2019).

SFF, therefore, expect to see these impact scoped in.

As a final comment, on pages 18 & 64, the name of SFF has been misspelled as Scottish Fisheries Federation. It can be amended to "Scottish Fishermen's Federation".

[Redacted]

Mohammad Fahim Hashimi  
**Offshore Energy Policy Officer**  
**Scottish Fishermen's Federation**



Transport Scotland

Emma Lees  
Marine Scotland  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

Your ref:

Our ref:  
GB01T19K05

Date:  
17/04/2023

[ms.marinerenewables@gov.scot](mailto:ms.marinerenewables@gov.scot)

Dear Sirs,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) REGULATIONS 2007**

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION AND  
MARINE LICENCES FOR THE SALAMANDER OFFSHORE WINDFARM**

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by Simply Blue Energy (Scotland) Ltd. in support of the above development.

This information has been passed to SYSTRA Limited (SYSTRA) for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

**Proposed Development**

The proposed development comprises a floating windfarm of up to seven turbines with an installed capacity of up to 100MW, located approximately 35km east of Peterhead. The windfarm will be supported by an export cable(s) making landfall approximately 2.5 km to the north of Peterhead, south of the St Fergus Gas Terminal and south-east of St Fergus village.

We note that the onshore infrastructure, consisting of the landfall, Onshore Export Cable, Onshore Substation (OnSS) and Energy Balancing Infrastructure (EBI) containing battery storage will sit within the Onshore Scoping Area. The SR states that materials brought by sea would be offloaded and travel on the A90(T) to the Onshore Development Area.

We also note that access to the onshore site and construction compounds will be from the A90(T), either from new junctions or upgraded existing access. Transport Scotland would state that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager. We would advise that access proposals be discussed at the earliest opportunity with the Area Manager for the A90(T) who is Paul Anderson and who can be contacted at [Paul.Anderson@transport.gov.scot](mailto:Paul.Anderson@transport.gov.scot). This will enable his comments to be taken onboard in the design. Any proposed changes to the trunk road network should be supported by 1:500 scale drawings at application stage and any proposed access junctions should be supported by a road safety audit.

### **Assessment of Environmental Impacts**

Chapter 12.4 of the SR presents the proposed methodology for the assessment of Traffic and Transport associated with the Onshore development. This states that the thresholds as indicated within the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Road Traffic are to be used as a screening process for the assessment.

The SR also indicates that potential environmental impacts such as severance and driver delay will be considered and assessed where the IEMA Guideline thresholds for further detailed assessment are breached. These specify that road links should be taken forward for detailed assessment if:

- Traffic flows will increase by more than 30%, or
- The number of HGVs will increase by more than 30%, or
- Traffic flows will increase by 10% or more in sensitive areas.

Where significant changes in traffic are not noted for any link, no further assessment needs to be undertaken.

We note that vehicle types and the associated number of vehicle movements required for the construction stage are yet to be developed. The SR states that these details will be included in the Environmental Impact Assessment Report (EIAR) when assessing potential impacts.

The SR states that base traffic flow data for four locations on the A90(T) has been obtained from the Department of Transport (Department for Transport, 2022). For completeness, average traffic flow data between 2016 – 2020 has been collated for the traffic count points. To consider the residual effects of COVID-19 on traffic flow within the vicinity of the Project, new traffic counts are proposed to support the EIAR. Transport Scotland is satisfied with this approach.

It is noted that any impacts associated with the operational phase of the development are to be scoped out of the EIA. Given the nature of the development, we would consider this to be acceptable in this instance.

### **Abnormal Loads Assessment**

We note that abnormal loads will be required to transport components to site. Transport Scotland will require to be satisfied that the size of loads can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.

A full Abnormal Loads Assessment report should be provided as a Technical Appendix to the EIA that identifies the route to site and the key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.

I trust that the above is satisfactory but should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully

[Redacted]

**Iain Clement**

**Transport Scotland  
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

# Ugie District Salmon Fishery Board

**From:** [Ugie Salmon](#) on behalf of [joseph@ugie-salmon.co.uk](mailto:joseph@ugie-salmon.co.uk)  
**To:** [MS Marine Renewables](#)  
**Subject:** RE: SCOP-0021 - Salamander Offshore Wind Farm  
**Date:** 20 March 2023 14:36:20  
**Attachments:** [image001.png](#)

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Dear Sir or Madam

I would like to know if the people responsible for the Salamander Offshore Windfarm have considered and taken steps to avoid any harm being done to migrating salmon and sea trout in the sea and on the land, in the construction and operating phase of this project.

The Ugie District Salmon Fishery Board have responsibility for the protection and enhancing of the populations of Salmon and sea trout in the Peterhead area on the Buchan coast.

kind regards

[Joseph Yule](#)

[Ugie District Salmon Fishery Board](#)

Lunar Ugie Salmon

Salmon Fish House

Golf Road

Peterhead

AB42 1LS

[Redacted]

email [joseph@ugie-salmon.co.uk](mailto:joseph@ugie-salmon.co.uk)

website [www.ugie-salmon.co.uk](http://www.ugie-salmon.co.uk)

open Monday to Friday 8am - 5pm



**UGIE SALMON 1585**

UK Chamber of Shipping



30 Park Street  
London  
SE1 9EQ

[rmerrylees@ukchamberofshipping.com](mailto:rmerrylees@ukchamberofshipping.com)

020 7417 2843

13 April 2023

Dear Sir/Madam

## **The UK Chamber of Shipping Response to Salamander Offshore Wind Farm Scoping Report Consultation**

### **Shipping and Navigation Scoping Questions**

- **Do you agree that all relevant legislation, policy and guidance documents have been identified for the shipping and navigation assessment, or are there any additional legislation, policy and guidance documents that should be considered?**

The list of documentation looks broadly as expected to assess the shipping and navigation impact, however should also include Scotland's National Marine Plan and its policies and Scotland's Sectoral Marine Plan for Offshore Wind Energy and its policies.

- **Do you agree with the study area defined for shipping and navigation?**

Yes the 10nm study area is an accepted standard. The Chamber recommends a wider routing study area of 50nm, which may be included as part of the wider cumulative impact assessment to consider routing impacts of the proposed development in combination with other developments.

- **Do you agree with the data and information sources identified to inform the baseline for shipping and navigation including the planned vessel traffic surveys, or are there any additional data and information sources that should be considered?**

AIS data from 2021 will not be representative of a typical year due to Covid-19 in particular for passenger/cruise traffic. Accordingly, the Chamber strongly recommends that additional AIS data for 2022 is procured especially for the summer period. This is widely available and allows for greater seasonal analysis.

- **Do you agree with the suggested embedded mitigation measures?**

The Chamber would expect to see inclusion of all the embedded mitigation measures as a minimum.



**• Do you agree that all potential receptors and impacts have been identified for shipping and navigation?**

The list is as the Chamber would expect at this stage.

**• Do you agree that the impacts proposed can be scoped out of the shipping and navigation EIA chapter?**

The Chamber agrees that no potential impacts should be scoped out.

**• Do you agree with the approach for cumulative effects assessment and transboundary impacts?**

The Chamber agrees that cumulative and transboundary impacts need to be considered and is satisfied with a 50nm study area.

The Chamber does not consider that the impacts relating to vessel displacement and reduction in port access should be assessed for the Project at the “in isolation” level only but also cumulatively with other projects in the area which impact upon the service.

**• Do you agree with the proposed assessment approach and list of planned consultees?**

Yes

The Chamber trusts these comments will be taken into consideration and looks forward to further engagement with the applicant during the planning and consenting process.

**Yours faithfully,**

**Robert Merrylees**

Policy Manager (Safety & Nautical) & Analyst

**UK Chamber of Shipping**

[rmerrylees@ukchamberofshipping.com](mailto:rmerrylees@ukchamberofshipping.com)

0207 417 2843

# Whale and Dolphin Conservation

**From:** [Vicki James](#)  
**To:** [MS Marine Renewables](#)  
**Subject:** FW: SCOP-0021 - Salamander Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 15 April 2023  
**Date:** 24 March 2023 09:26:33  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)

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Dear Emma,

Thank you for your email below, I have been forwarded this as Fiona has recently left WDC and I'm helping out on offshore renewable responses until that role is recruited for.

We generally don't engage on individual developments, so please take this as a 'nil return' response.

Do let me know if you have any queries.

Best wishes.

Vicki

**Vicki James**  
Green Whale research coordinator

Telephone: +44 (0)1249 449 500

WDC, Whale and Dolphin Conservation  
Brookfield House  
38 St. Paul Street  
Chippenham  
Wiltshire  
SN15 1LJ  
United Kingdom  
[whales.org](http://whales.org)



LET'S END IT FOREVER



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Whale and Dolphin Conservation ("WDC") is a company registered in England and Wales (No. 02737421) and a registered charity (in England and Wales No. 1014705, in Scotland No. SC040231)  
WDC Shop is a trading name of WDC (Trading) Ltd, a company registered in England and Wales (No. 02593116)  
Registered office: Brookfield House, 38 St. Paul Street, Chippenham, Wiltshire, SN15 1LJ. Tel: +44 (0)1249 449 500  
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[Redacted]