Aberdeen International Airport

Aberdeen International Airport

Aberdeen International Airport Limited
Dyce, Aberdeen
AB21 7DU
Scotland

T: [redacted]
W: aberdeenairport.com

FAO Toni-Marie McGinn
Marine Directorate

Via Email

ABZ Ref: ABZ3149

2nd June 2023

Dear Toni-Marie

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007 ("the MW EIA Regulations")

CONSULTATION UNDER SCHEDULE 4, REGULATION 6 OF THE MW EIA REGULATIONS CULZEAN FLOATING WIND PILOT

I write in relation to the above application.

The proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria. We, therefore, have no objection to this proposal.

[redacted]
Kirsteen MacDonald

Safeguarding Manager
Aberdeen Airport
[redacted]

BT

From:	radionetworkprotection@bt.com
To:	MS Marine Renewables
Subject:	SCOP-0024- TotalEnergies - Culzean Floating Wind Pilot - Culzean Field, North Sea - Consultation on Request for Scoping Opinion - Response required by 2 June 2023 WID13098
Date:	09 May 2023 15:09:35
Attachments:	image001.png

OUR REF:- WID13098

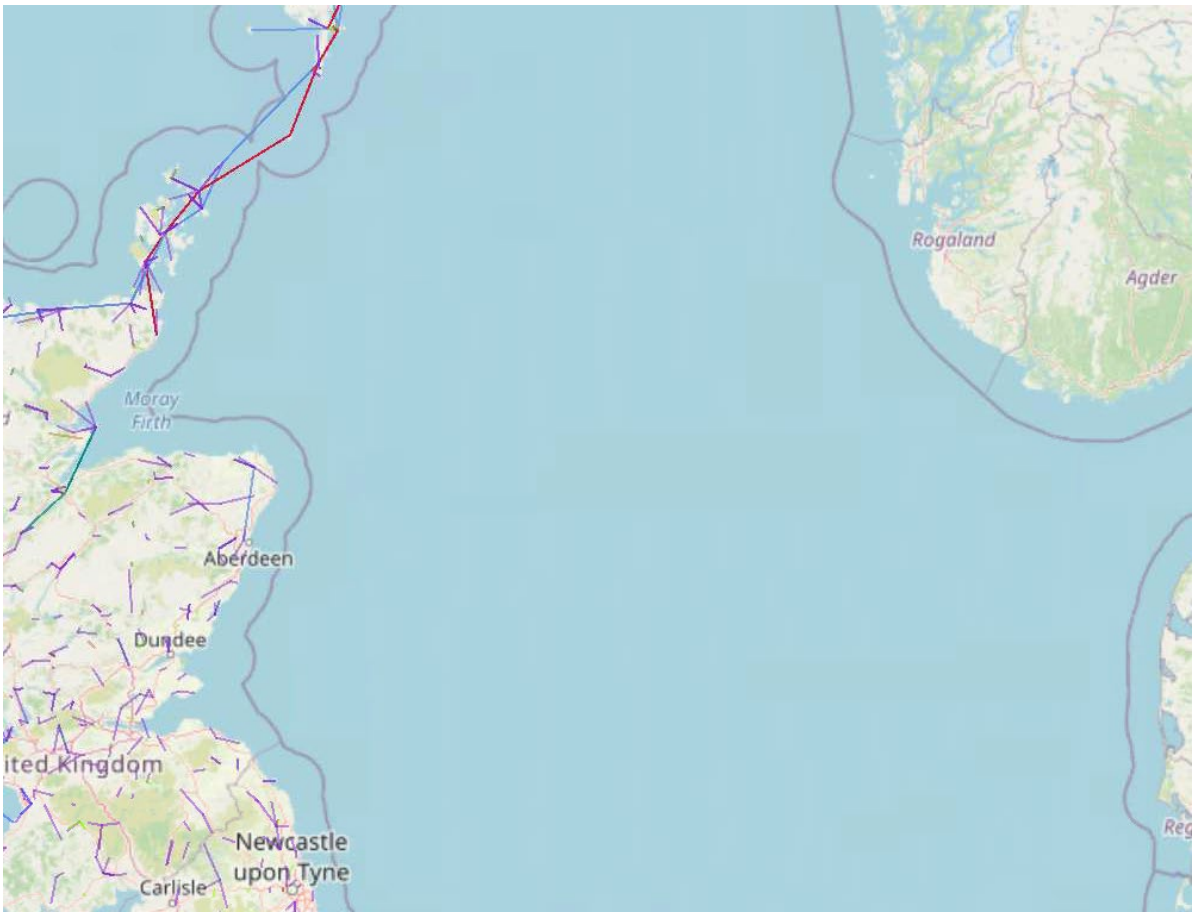
Good afternoon Toni-Marie

Thank you for your email dated 05/05/2023

We have studied the proposed windfarm development with respect to EMC and related problems to BT point-to-point microwave radio links.
The conclusion is that the Project indicated should not cause interference to BT's current and presently planned radio network.

However, once the grid-ref co-ordinates and number of WTG's are confirmed, please inform us so we can plot them and re-assess for any issues.

Kind Regards
Chris



Cruising Association

From:	rickballard.rats@gmail.com
To:	MS Marine Renewables
Subject:	Culzean Floating Wind Pilot
Date:	09 May 2023 09:53:37

Thank you for inviting the Cruising Association to comment on the Scoping Report for the Culzean Floating Wind Pilot.

As we understand it the pilot comprises just one turbine. This will have a very small impact on recreational boaters so provided the turbine is properly lit and marked (as no doubt it will be) we have no comments to make at this stage.

Rick Ballard
Regulatory & Technical Services (RATS)
Cruising Association
w: https://www.theca.org.uk/public/rats
[redacted]

Edinburgh Airport

From:	Safe Guarding
To:	MS Marine Renewables
Cc:	Safe Guarding
Subject:	Scoping Opinion - Culzean Floating Wind Pilot
Date:	25 May 2023 16:02:08
Attachments:	image001.png

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

Edinburgh Airport
Where Scotland meets the world

Our values

t: +44 (0)131 344 3845 m: 07771 842927
www.edinburghairport.com

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

Historic Environment Scotland

By email to:
MS.MarineRenewables@gov.scot

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

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

[redacted]

Our case ID: 300065561
Your ref: SCOP-0024

16 June 2023

Dear Marine Scotland

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Culzean Floating Wind Pilot - Culzean Field, North Sea
Scoping Report

Thank you for your consultation which we received on 05 May 2023 about the above scoping report, and for allowing us extra time to respond. 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, historic marine protected areas (HMPAs), and undesignated offshore archaeological remains within the development area.

Proposed Development

We understand that the project is located c. 222km east of Aberdeen, and c. 2km west of the existing oil and gas platform of Culzean Field. The project does not require a grid connection to shore, and the project development area will be entirely within the offshore region between 12 NM and Scottish Exclusive Economic Zone boundary.

We understand that the project will have a capacity of 3MW and comprise 1 wind turbine (with upper tip height of 134m), 1 floater to support the wind turbine (with a mooring radius of c. 600m around the floater centre), mooring and anchoring systems for the floating substructure and a single export cable (c. 2km) connecting the turbine to the existing Culzean platform via an existing J-tube on the platform. Regarding the mooring design for the floating substructure, we note from the scoping report that there is a high likelihood that dragging anchors would be used, but pin piling may be used as a contingency if an alternative anchor is required, and will be assessed as the worst-case option within the scoping assessment.

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

Our Interests

We can confirm that the application area does not fall within any HMPAs and there is no designated heritage asset within or near to the application area. An obstruction (Canmore ID 322112) is located c. 1.2km to the southwest of the application area.

Our Advice

We are content with the principle of the development. Regarding the scope of assessment, we would like to highlight the importance for all areas which have potential to be subject to direct and indirect impacts to be assessed for impacts on the historic environment. This assessment should conform to the requirements in the Guide for Archaeological Requirements for Offshore Wind. Our detailed comments on the scoping report and proposed methodology are in the **Annex** to this letter.

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. 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.

Yours faithfully

Historic Environment Scotland

Annex

Scope of assessment

We understand from Chapter 3.2 that the EIA for this project is adopting a Design Envelope approach due to the innovative nature of the development and that some of the final design details are likely to be unknown at the time of application, such as the number of mooring / anchors and the systems used and the export cable parameters. The scoping report has stated that the Design Envelope approach will present the Maximum Design Scenarios for the project for which significant effects can be established for each impact pathway and receptor to allow meaningful assessments to be undertaken for the project, while retaining reasonable flexibility for future project design. We are content that this is an appropriate approach to the assessment for this project.

We understand that an application area has been indicated in Figure 3.1. However, it is unclear in the report whether impacts on designated or undesignated historic environment features due to any modifications required to the host installation (i.e. the Culzean platform) will be considered (Chapter 3.2 refers). It is important that all areas which have potential to be subject to direct and indirect impacts are assessed.

We agreed that the desk-based sources to be examined for the EIA marine archaeology and cultural heritage baseline characterisation in Chapter 8.7.4 are appropriate. We note that the report has recommended in Table 8-20 to carry out an archaeological assessment of available marine geophysical survey datasets. We understand that these datasets will consist of 'as available' geophysical and geotechnical data collected specifically for the proposed development. Similarly, it is not clear if this survey coverage would include all areas where there is a potential risk of direct or indirect impacts on known or unknown cultural heritage assets. We recommend all areas where there is a potential risk of direct or indirect impacts, both within and outwith the proposal, are surveyed using techniques which will produce data appropriate for archaeological assessment. Guidance on this can be found here: guide-to-archaeological-requirements-for-offshore-wind.pdf (thecrownestate.co.uk).

Known and unknown marine archaeology and cultural heritage receptors

The report has proposed in Table 8-21 to scope in direct impacts on these receptors during construction and decommissioning as well as operation and maintenance. The report has also proposed to scope in indirect disturbance to these receptors caused by anchoring and mooring systems during construction and decommissioning, and caused by additional cable protection used during repair and maintenance in the operation and maintenance phases. We are content with this approach.

We welcome the applicant's finding that an area of debris consistent with a potential wreck was located c. 0.9km south of the application area according to previous survey

(Chapter 8.7.5 (p.213) refers). We would welcome further update on, and where necessary, assessment of any potential impact from the project on this potential wreck in the EIA Report. [redacted]

Submerged prehistory receptors
We agree that the report's proposal in Table 8-21 to scope out submerged prehistory receptors is appropriate, as the report has demonstrated that the potential for in-situ deposits in the relevant location is unlikely.

Setting impacts
Given the distance to shore, we are content that onshore designated assets will not be affected by the proposal and impacts on their settings can therefore be scoped out.

Cumulative and transboundary impacts
We are content with the approach for assessing cumulative impacts on marine archaeology receptors as discussed in Chapter 8.7.8.

Having considered the location of this project, we are also content with the scoping out of the potential transboundary impacts on the marine historic environment during the construction, operation and maintenance, and decommissioning phases of the project.

Proposed Embedded Mitigation Measures

We welcome the recommendation to embed appropriate mitigation into the scheme. The proposals to avoid known cultural heritage receptors through the implementation and monitoring of Archaeological Exclusion Zones (AEZs), and to include a Protocol for Archaeological Discoveries (PAD) in the project's embedded mitigation, are appropriate. We would also recommend a Written Scheme of Investigation (WSI) is produced and embedded in the scheme. This would form an umbrella document for all archaeological survey, investigation and assessment required during the project.

Historic Environment Scotland
16 June 2023

Marine Directorate – Marine Analytical Unit

From:	Freimane I (Inga)
To:	Taylor K (Kate); MS Marine Renewables
Cc:	Noble E (Edward); Diaz M (Reme); McQueen A (Amy); Allen K (Kathleen); Barclay K (Kay)
Subject:	RE: SCOP-0024- TotalEnergies - Culzean Floating Wind Pilot - Culzean Field, North Sea - Consultation on Request for Scoping Opinion - Response required by 2 June 2023
Date:	17 May 2023 15:21:26

Dear Kate,

Please note that the MAU is submitting a ‘nil return’ response.

Many thanks,
Inga

Dr Inga Freimane
Social Researcher | Marine Analytical Unit | **marinescotland**
[redacted]

Marine Directorate - Marine Scotland Science

[redacted]

Kate Taylor
Marine Scotland Licensing Operations Team
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

22 May 2023

CULZEAN FLOATING WIND PILOT - 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 advise that AIS data from EMODnet referred to in the Good Practice Guidance[1] should be used for the assessment, rather than the 2019 MMO AIS dataset listed, as this will provide more up to date data. MSS also advise looking at the vessel tracks for the last 5 years, rather than only 2019, to get a better understanding of the commercial fisheries baseline.

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 note that the VMS dataset have been used to produce figures for average VMS value

(Figure 8-3). MSS advise that the VMS dataset are also used to produce figures presenting the fishing effort (kW per hour) for vessels, which will provide further information about the commercial fisheries baseline and possible displacement of fishing effort.

Impacts

MSS do not agree that all potential impacts have been identified. MSS advise the potential impact of safety issues for fishing vessels during the operation and maintenance phase of the project are identified, due to the risk of fishing gear becoming entangled in floating foundations and mooring systems. There is also the risk of gear snagging on the cable if burial is not fully achieved.

MSS queries why fisheries displacement has been scoped in for the operation and maintenance phase but scoped out for construction and decommissioning. MSS advise to scope in both impacts for consistency.

MSS is content with the impact "Obstruction of regular fishing vessel transit routes" being scoped out, on the basis that there is minimal fishing activity in the area where the project is proposed, the site is very far offshore and the project is small with only one turbine. However, should the fisheries baseline change with the inclusion of the data highlighted above to suggest higher fishing activity than currently identified, MSS advise that this impact should be scoped in, and should cover all phases of the project, not just operation and maintenance.

References

[1] Marine Scotland (Xodus) 2022. Assessing fisheries displacement by other licensed marine activities: good practice guidance. 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

Vinu John
Maritime and Coastguard Agency
UK Technical Services Navigation

www.gov.uk/mca
01 June 2023

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

Our ref: SCOP0024

Dear Sir/Madam

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007. THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

Scoping Opinion Consultation Response: Culzean Floating Wind Pilot .

Thank you for the opportunity to comment on the Scoping Report for the Culzean floating wind pilot submitted by Total Energies. The MCA has reviewed the report, as detailed in your email dated 05 May 2023. The MCA's remit for offshore renewable energy development is to ensure that safety of navigation is preserved whilst progress is made towards government targets for renewable energy.

The EIA 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.

A Navigational Risk Assessment (NRA) will need to be submitted in accordance with MGN 654 (and MGN 372 Amendment 1) and the MCA's Methodology for Assessing the Marine Navigation Safety & Emergency Response Risks of Offshore Renewable Energy Installations (OREI). This NRA should be accompanied by a detailed MGN 654 Checklist which can be downloaded from the MCA website at https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping

I note, in Section 8.3.10 that the project intends to carry out a vessel traffic survey to the standard of MGN 654 i.e. at least 28 days which is to include seasonal data (two x 14-day surveys). We would suggest this should be from a vessel-based survey using AIS, radar and visual observations to capture all vessels navigating in the study area.

We note that the applicant proposes a single turbine of 3MW to be installed near the Culzean Gas Field, the layout 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.

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.

Under section 8.3.6 we note that the applicant mentions 'marking buoys and lighting to meet MCA and NLB and in line with IALA recommendations O-139, we would like to point out that the latest version of this document is G1162 published in 2021. And we would also like to point out that the Civil Aviation Authority (CAA) should also be consulted during this process.

It is to be noted that regulatory mooring expectations should be identified as a potential mitigation and MCA can confirm this guidance should be followed and that a Third-Party Verification of the mooring arrangements will be required.

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). Attention should be paid to 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)) that can cover the entire wind farm sites and their surrounding areas. A SAR checklist will also need to be completed in consultation with MCA.

The applicant has referred to MGN 372 (2008) within section 8.3.12 References, we would like to point out that MGN 372 Amendment 1 (2021) is the latest version of this document.

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.

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. As this project progress, we would welcome engagement with the developers, and early discussion on the points raised above.

<u>Response to Scoping Questions in Section 8.3.11</u>

• Do you agree with the proposed approach to survey data collection?
Yes, we are content with a vessel traffic survey to the standard of MGN 654 i.e. at least 28 days which is to include seasonal data (two x 14-day surveys). We would suggest this should be from a

vessel-based survey using AIS, radar and visual observations to capture all vessels navigating in the study area.

• Do you agree with the proposed Study Area (incorporating a 10 NM [18.52 km] buffer around the proposed floating wind turbine)?

Yes.

• Do you agree with the list of scoped impacts?

Yes, we agree with the list of Scoped IN impacts.

• Do you agree the embedded mitigation is appropriate, or are there other measures that should be included?

Yes, we agree the embedded mitigations are appropriate and would also recommend the applicant to consider additional mitigation measures like Third-Party verification of mooring systems.

• Are there any additional shipping and navigation organisations that you would recommend be consulted?

Along with regular vessel operator, Oil and Gas platforms and operators within the area also to be consulted.

Yours faithfully,

Vinu John
Navigation Policy Advisor

Ministry Of Defence

Defence Infrastructure Organisation

Teena Oulaghan
Safeguarding Manager
Ministry of Defence
Safeguarding Department
Kingston Road
Sutton Coldfield
West Midlands B75 7RL
United Kingdom

Telephone [MOD]: [redacted]

E-mail: [redacted]

Your Reference: SCOP-0024

Our Reference: DIO10058956

Toni-Marie McGinn
Marine Scotland
Marine Directorate - Marine Planning & Policy
Scottish Government
Atlantic Quay
Glasgow
G2

30 May 2023

Dear Toni-Marie,

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007 ("the MW EIA Regulations")

CONSULTATION UNDER SCHEDULE 4, REGULATION 6 OF THE MW EIA REGULATIONS

SCOP-0024- TotalEnergies - Culzean Floating Wind Pilot - Culzean Field, North Sea

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping Opinion request in respect of the Culzean Floating Wind Pilot development received by this office on 05 May 2023. I write to confirm the safeguarding position of the MOD on the information that should be provided in the Environmental Statement to support any application.

The applicant has prepared an Environmental Impact Assessment Scoping Report of the proposed development. This recognises some of the principal defence issues that will be of relevance to the progression of the proposed development.

The developer is proposing to demonstrate the possibility of electrifying existing oil and gas assets in the North Sea by installing a floating turbine which would connect to the existing oil and gas platform known as Culzean Field. It is proposed to deploy one floating wind turbine with a blade tip height of 134 metres above sea level and a generation capacity of 3 mw, test floater and mooring system technologies for offshore floating wind and to demonstrate the feasibility of platform electrification. It is proposed that the floating turbine will be linked to Culzean Fields Central Processing Facility Platform by a 2 km export cable. The project does not require a grid connection to shore.

The use of airspace for defence purposes in the vicinity of the proposed development have been appropriately identified and considered. The Scoping Report considers some of the aviation and radar systems that may be affected by the proposed wind farm. The MOD is correctly identified as a relevant receptor in section 8.8 Aviation of the Scoping Report.

The report identifies that the turbine has the potential to affect and be detectable to, the Primary Surveillance Radars (PSR) and that there are 3 PSR in the wider region, all located in North Scotland. The report also acknowledges the Air Defence Radars (ADR) at RAF Buchan. Potential interference with military air traffic control and air defence radars during both construction and operational phases has been scoped out. The MOD accepts these conclusions, given the turbine specification and on the basis of the information currently available it is not anticipated that the proposed offshore would affect military radar systems.

The physical effect of introducing a tall structure on military low flying has been scoped in and the applicant states in the Scoping Report that they are committed to lighting and charting the turbines. In the interests of air safety, the MOD would request that the development be fitted with MOD accredited aviation safety lighting. As a minimum the MOD would require that the turbines are fitted with 25cd or IR lighting.

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

Yours sincerely

Teena Oulaghan
Safeguarding Manager

NATS

From:	NATS Safeguarding
To:	MS Marine Renewables
Cc:	Mcginn T (Toni-Marie); Taylor K (Kate); Malcolm J (Jessica)
Subject:	RE: SCOP-0024- TotalEnergies - Culzean Floating Wind Pilot - Culzean Field, North Sea - Consultation on Request for Scoping Opinion - Response required by 2 June 2023 [SG35298]
Date:	12 May 2023 13:30:04
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png

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Our Ref: SG35298

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

[redacted]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NatureScot

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

Toni-Marie McGinn
Scottish Government
Atlantic Quay
Glasgow
G2 8LU

02 June 2023

Our ref: CNS REN OSWF INTOG
Total – Culzean

Dear Toni-Marie,

TOTALENERGIES – CULZEAN FLOATING WIND PILOT

NatureScot SCOPING ADVICE

Thank you for consulting NatureScot on the Scoping Report submitted by TotalEnergies for the Culzean Floating Wind Pilot. We provide our advice on the natural heritage interests to be addressed within the Environmental Impact Assessment Report (EIAR) below for the proposed Culzean Floating Wind Pilot. This project would be located 222 km east of Aberdeen in the Central North Sea.

The proposal, which includes a project design envelope approach, comprises:

- one floating wind turbine (3 MW), with a test floater and mooring system;
- a 2 km export cable linking the floating turbine to the existing oil and gas Central Processing Facility Platform (CPF); and
- a proposed 10-year lease period.

Background

The proposed Culzean Floating Wind Pilot was awarded a TOG lease offer in March 2023 within the lease area E-a, under the INTOG leasing process. TOG projects are those connected directly to oil and gas infrastructure to support the decarbonisation of the oil and gas sector. The proposed Culzean Floating Wind Pilot will connect to the existing Culzean Field oil and gas platform, to demonstrate the possibility of electrifying existing oil and gas assets in the North Sea.

Content of the Scoping Report

We have reviewed the Scoping Report provided (A-100811-S00-A-REPT-001 Rev A01) and support the proposed approach for the assessment to support the forthcoming application.

Assessment Approach

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

Wet storage

Section 3.6 briefly refers to the potential for wet storage of the export cable and mooring lines, with 50m safety zones sought for incomplete structures, with construction temporarily paused in some instances. If wet storage is located within the lease area, this is unlikely to represent a significant impact.

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 8.6, but recommend that this is considered further as it will be of potential use in terms of evaluating this pilot project overall.

Habitats Regulations Appraisal (HRA)

An HRA Stage 1 LSE screening report has not been provided alongside the Scoping Report, this will be submitted separately. We provide advice within our technical appendices (as discussed below) to assist in the consideration of screening and assessment requirements for sites / features under HRA.

Positive effects for biodiversity and nature inclusive design

We recommend early consideration of potential inclusion of positive effects for biodiversity as well as nature inclusive design. Whilst not a current policy requirement, as part of the need to address both the climate and biodiversity crises, we encourage developers to consider this as part of their application.

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. Plans do not strictly constitute mitigation; as it's the measures contained within the plan that will mitigate impacts. 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 refer you to our advice as detailed below within receptor-specific technical appendices for key natural heritage interests to be considered in the EIAR.

Regarding seascape, landscape and visual impact assessment (SLVIA), we agree with the conclusion in section 8.2 that there is no potential for significant impacts across the various phases of the Culzean Floating Wind Pilot due to its entirely offshore location and distance from the coast. We are therefore content for SLVIA to be scoped out of the EIAR.

- Advice on marine physical processes is provided in **Appendix A**.
- Advice on benthic interests is provided in **Appendix B**.
- Advice on fish and shellfish interests is provided in **Appendix C**.
- Advice on marine mammal interests is provided in **Appendix D**.
- Advice on ornithological interests is provided in **Appendix E**.

Further information and advice

NatureScot can provide further advice on natural heritage interests, at appropriate stages, as work is undertaken by the applicant in support of their formal submission. Please contact myself, Caitlin Cunningham in the first instance for any further advice.

Yours sincerely,

Caitlin Cunningham

Marine Sustainability Adviser

[redacted]

[redacted]

NatureScot ADVICE FOR CULZEAN FLOATING WIND PILOT

APPENDIX A – MARINE PHYSICAL PROCESSES

Marine physical processes are considered in section 6.1 (pages 39-61) of the Scoping Report. We have responded to the scoping questions raised within our advice below.

Study area

We are content with the study area as defined in section 6.1.3, which comprises the project area and a buffer of 5 km, based on the extent of tidal ellipses in the vicinity.

Baseline

We are content with the key data sources as listed in section 6.1.4.

Key impact pathways to consider

We are broadly content with the potential impacts scoped in as per Table 6-3 of the Scoping Report. However, we advise there are elements that require further consideration as outlined below.

Introduction of scour

The reasoning for scoping out potential scour is unclear, especially as the embedded mitigation merely refers to minimising cable protection, and thus a level of protection may still be required. We recommend that the potential introduction of scour is scoped in and should also take into account secondary scour around any installed scour protection.

Cumulative impacts

We are content with the approach to the cumulative impact approach, as outlined in section 5.4 and 6.1.8.

Mitigation and monitoring

We welcome the embedded mitigation measures as proposed in Table 6-2.

Transboundary impacts

We agree that transboundary impacts are scoped out from further consideration in the EIAR.

NatureScot ADVICE FOR CULZEAN FLOATING WIND PILOT

APPENDIX B – BENTHIC INTERESTS

Benthic interests are considered in section 7.1 (pages 75-92) of the Scoping Report. We have responded to the scoping questions raised within our advice below.

Study area

We are content with the proposed development study area as defined in section 7.1.3, which comprises the project area and a buffer of 5 km.

Baseline

Section 7.1.2 captures key legislation, policy and guidance, however it should also include Pearce and Kimber (2020)[1] in case *Sabellaria* reefs are identified during surveys. There is a knowledge gap regarding the distribution of *Sabellaria* reefs in Scottish waters and whilst there are no known reports of *Sabellaria* in the area to date, it does not preclude their presence.

Table 7-1 captures the relevant baseline datasets, with Section 7.1.5 presenting an appropriate summary of existing data and baseline characterisation.

Priority Marine Features (PMFs)

We support the inclusion of Priority Marine Features (PMFs)[2] and Annex I habitats.

Blue carbon

We welcome the consideration of blue carbon storage in section 7.1.5 and we are content that the potential for significant effects to blue carbon storage have been scoped out for further assessment.

Key impact pathways to consider

We are content with the potential impacts scoped in as per Table 7-4 of the Scoping Report.

Approach to impact assessment

The proposed assessment approach is set out in section 7.1.10 and we are content with this as detailed. We welcome the assessment of potential impacts on PMFs and Annex I habitats.

Cumulative impacts

We are content with the approach to the cumulative impact approach, as outlined in section 5.4 and 7.1.8.

Mitigation and monitoring

The embedded mitigation measures are discussed in Table 7-3 and we note that whilst not mentioned in this chapter, the marine physical processes section states that requirements for

[1] Pearce, B. and Kimber, J. (2020). The Status of *Sabellaria spinulosa* Reef off the Moray Firth and Aberdeenshire Coasts and Guidance for Conservation of the Species off the Scottish East Coast. Scottish Marine and Freshwater Science, Vol 11, No 17.

[2] https://www.nature.scot/professional-advice/protected-areas-and-species/priority-marine-features-scotlands-seas

scour protection will be included in the Construction Method Statement. Thus, we are content with what is proposed.

Additionally, we agree that effects from Electromagnetic Fields (EMF) are scoped out and welcome the intention to support a research proposal which focuses on visualising EMF that will provide an EMF recorder around the Culzean floating wind pilot project, as discussed in section 1.3 (project overview). This will help increase our collective knowledge.

Transboundary impacts

We agree that transboundary impacts are scoped out from further consideration in the EIAR.

NatureScot ADVICE FOR CULZEAN FLOATING WIND PILOT

APPENDIX C – FISH AND SHELLFISH INTERESTS

Fish and shellfish interests are considered in section 7.2 (pages 95-112) of the Scoping Report. We have responded to the scoping questions raised within our advice below.

Study area

We are content that the ICES rectangle that the project is located within is used as the study area.

Baseline

Table 7-5 summarises the key datasets and reports, however this should also include the recently published Essential Fish Habitat Maps for Fish and Shellfish Species in Scotland developed by the Scottish Marine Energy Research (ScotMER)[3] programme.

Priority Marine Features (PMFs)

We support the inclusion of Priority Marine Features (PMFs)[4] and highlight an error in section 8.2.5.5 where they are incorrectly referred to as 'Primary' Marine Features.

Key impact pathways to consider

We are broadly content with the impacts proposed to be scoped into the assessment as per Table 7-8 of the Scoping Report. However, we advise there are elements that require further consideration as outlined below.

Increased suspended sediments

Increased suspended sediment concentrations is a key impact pathway captured for construction and decommissioning activities across other receptors (e.g. marine physical processes and benthic ecology) and should also be scoped in for fish and shellfish interests, as the eggs of certain fish species may be sensitive to smothering and/or burial.

Approach to impact assessment

The proposed assessment approach is set out in section 7.2.10 and we are content with this as detailed.

Cumulative impacts

We are content with the approach to the cumulative impact approach, as outlined in section 5.4 and 7.2.8.

Mitigation and monitoring

The embedded mitigation measures are discussed in Table 7-7 and we note that whilst not mentioned in this chapter, the marine physical processes section states that requirements for scour protection will be included in the Construction Method Statement. Thus, we are content with what is proposed.

[3] Developing essential fish habitat maps: report - gov.scot (www.gov.scot)
[4] https://www.nature.scot/professional-advice/protected-areas-and-species/priority-marine-features-scotlands-seas

Transboundary impacts

We agree that transboundary impacts are scoped out from further consideration in the EIAR.

NatureScot ADVICE FOR CULZEAN FLOATING WIND PILOT

APPENDIX D – MARINE MAMMAL INTERESTS

Marine mammal interests are considered in section 7.3 (pages 114-129) of the Scoping Report. We have responded to the scoping questions raised within our advice below.

Study area

We are content with the study area, which proposes to use Management Units (MUs) and the site-specific survey area for an indication of local densities, as defined in section 7.3.3.

Baseline

Table 7-9 summarises the key data sources used to inform the marine mammal baseline. We are content with the data sources listed. However, we advise that SCANS IV is expected to report later this year, and should be included if available in time.

We agree with the species identified in section 7.3.5 (baseline environment) and would expect results of survey work to inform the species list, if any others are recorded in the area.

Key impact pathways to consider

We are content with the impacts proposed to be scoped into the assessment as per Table 7-12 of the Scoping Report.

Approach to underwater noise modelling

The proposed assessment approach is set out in section 7.3.10 and we are content with this as detailed.

Cumulative impacts

We are content with the approach to the cumulative impact approach, as outlined in section 7.3.8 and support the use the Cumulative Effects Framework.

Mitigation and monitoring

The embedded mitigation measures are discussed in Table 7-11 and we are broadly content with what is proposed. If piling is required, we advise the JNCC (2010)[5] protocol for minimising the risk of injury to marine mammals from piling noise is also included. Regarding the JNCC seismic (2010) and geophysical (2017) guidance, we advise that only the 2017 version should be used.

Transboundary impacts

We agree that transboundary impacts should be assessed further within the EIAR, as per section 7.3.9.

[5] JNCC (2010). Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise.

NatureScot ADVICE FOR CULZEAN FLOATING WIND PILOT

APPENDIX E – ORNITHOLOGICAL INTERESTS

Ornithological interests are considered in section 7.4 (pages 134-150) of the Scoping Report. We have responded to the scoping questions raised within our advice below.

Study area

Within section 7.4.1, narrative is provided on the scope of the study area (as per sections 7.4.1 and 7.4.3) however this focuses on foraging ranges of seabirds during the breeding season only. Consideration is also required for the non-breeding season and for other marine bird species, although we note these elements are discussed in later sections including reference to BDMPS (Furness, 2015).

We agree with the approach to use the mean-maximum range +1SD to derive theoretical connectivity - our guidance note 3[6] specifies our recommended foraging range values, including the 3 key exceptions.

Baseline

Data sources

We have reviewed the data sources in Table 7-13 and we are broadly content with the list. Consideration should also be given to a number of reports that are due for publication soon, or recently published, e.g. the JNCC review of avoidance rates[7] and OWSMRF Procellariiforms[8]. Please also note that with respect to potential collision risk to migratory species, that the existing strategic level report by WWT and MacArthur Green (2014) is currently being updated. 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 raptors. The updated review (and its associated mCRM tool) should be available imminently to then be used within the assessment. If there is no overlap with migration fronts then quantitative migratory CRM will not be required and this can be assessed qualitatively.

Baseline characterisation

It is unclear what data have been used to inform the marine habitat utilisation maps presented for guillemot, kittiwake and razorbill, as per Figures 7-16, 7-17 and 7-18, or the rationale for the 300 – 400km buffers. We note that the full-one year DAS will completed in March 2023 and welcome the intention to survey the nearby Culzean platforms to establish presence and number of breeding seabirds.

SPA connectivity

As above, we are unclear why 300 and 400km buffers have been used when considering connectivity to SPAs. Connectivity during the breeding season should be based on Woodward et

[6] https://www.nature.scot/doc/guidance-note-3-guidance-support-offshore-wind-applications-marine-birds-identifying-theoretical
[7] https://hub.jncc.gov.uk/assets/de5903fe-81c5-4a37-a5bc-387cf704924d
[8] https://jncc.gov.uk/our-work/owsmrf/

al (2019) or BDMPS (Furness, 2015) in the non-breeding season (with exceptions detailed in our guidance note, e.g. for guillemot).

Section 7.4.7 refer to the use of tracking data to discount a number of colonies for far ranging species (namely, fulmar, gannet, great skua and manx shearwater). We caution against discounting too early as it guards against pre-judging species and impacts. Instead, an initial long list of SPAs for consideration under Habitats Regulations Appraisal (HRA) should be developed using the foraging ranges as described above to determine theoretical connectivity. Biological reasoning can then be applied to refine this list, such as considering at sea distances or consideration of tracking studies where there is clear segregation of foraging behaviour – no evidence is provided within the Scoping Report of these tracking studies so we cannot advise further at this stage.

Once analysis of the one-year digital aerial survey campaign is complete, further refinement of this list can then reflect what species are found when and in what density, and what impacts they may be vulnerable too. We therefore expect that Table 7-14 will be updated to reflect this iterative process and will provide further advice during the consultation on the Stage 1 LSE Screening Report, which should also include justification of use of any tracking studies. Given the offshore location and distance to colonies, it also may be helpful to consider flight direction from the digital aerial surveys.

Key impact pathways to consider

We broadly agree with Table 7-16 of the Scoping Report that summarises the impacts proposed to be scoped in and out of the assessment. However, we advise there are elements that require further consideration as outlined below.

Disturbance and displacement

We note that vessel activity, construction noise, lighting and the presence of the WTG leading to disturbance or displacement is scoped out during the construction, decommissioning and O&M phase. While we wish to be proportionate to the scale of the development proposed, we are unable to agree with this approach until we can review the analysed data from the full 12 months of DAS to better understand bird usage of the site. As such, we advise against scoping these out at this stage.

Approach to impact assessment

Overall, we are content with the approach outlined in section 7.4.12 of the Scoping Report for impact assessment.

With regards to HPAI, we are still reviewing the impact on seabird populations in Scotland and cannot yet quantify the impact from these mass mortality events. We can provide more detail on this as our advice develops.

Cumulative impacts

We are content with the approach to the cumulative impact approach, as outlined in section 7.4.10 and support the use the Cumulative Effects Framework.

Mitigation and monitoring

The embedded mitigation measures are discussed in Table 7-15 and we are content with what is proposed. We advise further details of the mitigation measures are included in the EIAR.

Transboundary impacts

We advise that transboundary impacts remain in for the time being for further consideration in the EIAR, until the full 12 months of DAS have been completed.

Northern Lighthouse Board

Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

[redacted]

Website: www.nlb.org.uk

[redacted]

Your Ref: SCOP – 0024
Our Ref: AL/OPS/ML/O6_34_810

Ms Toni-Marie McGinn
Marine Licensing Casework Manager
Marine Scotland – Marine Planning and Policy
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

11 May 2023

SCHEDULE 4, REGULATION 6 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007

SCOP-0024 – TotalEnergies – Culzean Floating Wind Pilot – Culzean Field, North Sea

Thank you for your e-mail correspondence dated 5th May 2023 relating to the Scoping Report submitted by **TotalEnergies E&P UK Ltd** in relation to the proposed deployment of a single 3MW floating wind turbine connected to the Culzean oil and gas platform via a 2km export cable.

Northern Lighthouse Board note the inclusion within Section 3.6 Offshore Construction of the intention to provide a lighting and marking solution in line with the requirements of IALA publications G1162 and R0-139, following engagement with NLB.

NLB have no objection to the content of the Scoping Report, and have no recommendations for further navigational impacts that should be included within the report.

Yours sincerely

[redacted]

Peter Douglas
Navigation Manager

RSPB

From:	Catherine Kelham
To:	MS Marine Renewables
Subject:	RE: SCOP-0024- TotalEnergies - Culzean Floating Wind Pilot - Culzean Field, North Sea - Consultation on Request for Scoping Opinion - Response required by 2 June 2023
Date:	12 June 2023 09:31:56

Good Morning,

I'm sorry for the delay in response. RSPB Scotland are not proposing to provide comment on this scoping opinion request.

Best wishes,

Catherine

Scottish Environmental Protection Agency

From:	Planning.North
To:	MS Marine Licensing
Cc:	Mcginn T (Toni-Marie)
Subject:	SEPA Ref: 9094 - SCOP-0024
Date:	11 May 2023 11:56:26

OFFICIAL

Dear Toni-Marie McGinn

Marine (Scotland) Act 2010
SCOP-0024
TotalEnergies - Culzean Floating Wind Pilot
Culzean Field, North Sea

In line with the advice in the Transitional Arrangements for National Planning Framework 4 letter, issued by the Chief Planner, Fiona Simpson, on 8 February 2023, that "From 13 February, on adoption and publication by Scottish Ministers, NPF4 will form part of the statutory development plan, along with the LDP applicable to the area at that time and its supplementary guidance. NPF4 will supersede National Planning Framework 3 and Scottish Planning Policy (SPP) (2014). NPF3 and SPP will no longer represent Scottish Ministers' planning policy and should not therefore form the basis for, or be a consideration to be taken into account, when determining planning applications on or after 13 February", our position and advice given below is based on the NPF4 policy.

Thank you for the above consultation. Based on the information provided, it appears that this application falls below the thresholds for which SEPA provide site specific advice. Please refer to our standing advice and other guidance which is available on our website. In addition, please also refer to our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations available here.

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

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

Kind regards,
Nicki Dunn
Senior Planning Officer

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.

Scottish Fishermen’s Federation

Our Ref: FH/01/0623

Your Ref: SCOP-0024

E-mail:
02 May 2023

Scottish Fishermen's Federation
24 Rubislaw Terrace
Aberdeen, AB10 1XE
Scotland UK

[redacted]

www.sff.co.uk

SFF Response on Culzean Floating Wind Pilot Request EIA Scoping Consultation

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 and agrees.

As a general comment, finalisation of many features of the project design such as moorings system and export cable, seem to be pending further assessments; therefore, the current comments are based on the existence version of the EIA scoping report and may vary once the final application is ready. In addition, SFF appreciate the small size of the development and we limit our comments on some specific points of this EIA Scoping Report (report).

Export cable: the final decision on selection of export cable routes and its construction is missing and according to this report, the export cable would be trenched and where possible be buried, if not mechanical protections would be used. SFF would want the export cable to be totally trenched and buried since use of mechanical protection create snagging hazard to fishing vessels. If cable burial is technically not possible, minimal small size rock protections (based on the industry best practices) should be used rather than concrete mattresses.

Moorings: since the length of the moorings are going to be ~600 m, SFF want to see proper safety measures are taken to protect the safety of fishing vessels in the area.

EMF Effects: Both, 7.1 Benthic Ecology, and 7.2 Fish and Shellfish Ecology parts of the report have scoped out the EMF effects on benthic and fish and shellfish ecologies. SFF appreciates the developer's argument which are based on some publication cited in the report; however, we would argue that other studies such as St Abbs Marine Station's show the impact of EMF on brown crab. In addition, the report itself acknowledges lack of proper scientific evidence of EMF effects on

marine environment. Therefore, as the development site sits in spawning and nursery ground for some fish as well as pelagic, dredging and demersal fishing ground, we would like to see the EMF effects of the development on marine environment scoped in.

Boulders relocation: the report acknowledges existence of boulders within the development area. As relocation of boulders create snagging hazards for fishing vessels, SFF suggest that as far as technically possible the boulders should not be relocated during the construction works especially export cable construction. In case relocation of boulders is inevitable, maximum efforts should be made to relocate as little number of boulders as possible. In addition, we recommend that boulder relocation should be scoped in to the EIA report and if boulders relocated, their new locations to be recorded and shared with SFF via USB sticks for the fishing vessels records.

Pollutant and noise effects: SFF believe that the 'Effects to fish and shellfish ecology due to accidental release of pollutants' and 'Subsea noise from wind turbine operation impacting fish and shellfish receptors' during operation and maintenance should be scoped in and monitored.

Best regards

Mohammad Fahim Hashimi
Offshore Energy Policy Officer
Scottish Fishermen's Federation

The Royal Yachting Association

RYA Scotland

Royal Yachting Association Scotland

Caledonia House
1 Redheughs Rigg
South Gyle
Edinburgh
EH12 9DQ

[redacted]
W www.ryascotland.org.uk

30 May 2023
Toni-Marie McGinn
Marine Licensing Casework Manager
Scottish Government, Marine Laboratory,
375 Victoria Road,Aberdeen,AB11 9DB

Dear Toni-Marie,

SCOP-0024- Total Energies - Culzean Floating Wind Pilot - Culzean Field, North Sea

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

8.2 Seascape and Landscape Visual Impact Assessment

We are happy that an assessment of potential impacts on seascape, landscape, and visual amenity should be scoped out of the EIA on the basis of no potential significant effects.

8.3 Shipping and Navigation

1) Do you agree with the proposed approach to survey data collection? Yes. There is no need to collect additional information on recreational vessel traffic. The key point is that some recreational vessels will pass through the site each year sometimes in conditions of adverse weather and visibility.
2) Do you agree with the proposed Study Area (incorporating a 10 NM [18.52 km] buffer around the proposed floating wind turbine)? Yes.
3) Do you agree with the list of scoped impacts? Yes.
4) Do you agree the embedded mitigation is appropriate, or are there other measures that should be included? The embedded mitigation is appropriate but with regard to marking and lighting it is important to ensure that failure of these can be rectified quickly.
5) Are there any additional shipping and navigation organisations that you would recommend be consulted? Not that I am aware of.

I will work with my colleague in the Cruising Association on this. We would be happy to take part in the Navigational Risk Assessment.

Yours sincerely,

[redacted]

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

Tampnet

From:	Gavin Youngson
To:	MS Marine Renewables
Subject:	RE: SCOP-0024- TotalEnergies - Culzean Floating Wind Pilot - Culzean Field, North Sea - Consultation on Request for Scoping Opinion - Response required by 2 June 2023
Date:	05 June 2023 14:07:56
Attachments:	image001.png image002.png

Hi Kate,

Sorry, this it seems to have went a miss somewhere along the lines.

But I can confirm we have nothing to add or indeed any immediate concerns regards the project.

Thanks,

Gavin Youngson
Account Manager, UK

12a Carden Place,
Aberdeen.
AB10 1UR.

[redacted]

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Transport Scotland

Development Management and Strategic Road Safety
Roads Directorate

George House 36 North Hanover St Glasgow G1 2AD
[redacted]

TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

Kate Taylor
Marine Scotland
Scottish Government
Marine Laboratory
375 Victoria Road
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ms.marinerenewables@gov.scot

Your ref:

Our ref:
GB01T19K05

Date:
02/06/2023

Dear Sirs,

THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007

CULZEAN FLOATING WIND PILOT - CULZEAN FIELD, NORTH SEA - CONSULTATION ON REQUEST FOR SCOPING OPINION

With reference to your recent correspondence on the above development, we acknowledge receipt of the EIA Scoping Report (SR) prepared by Xodus Group 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

We understand that the Culzean Floating Wind Pilot Project comprises one floating wind turbine with a capacity of 3 MW, test floater and mooring system technologies for offshore floating wind, located in the North Sea, approximately 222km off the coast of Peterhead. We also note that the project does not require a grid connection to shore, and the Project Development Area will be entirely offshore.

The SR states that it will take approximately one month for the construction/installation of the turbine.

Given the limited size of the project and that it is located entirely offshore, we can confirm that Transport Scotland is satisfied that it is unlikely that the project will have a perceivable impact on the trunk road network and no further information or analysis is required in this regard.

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.