

# Aberdeen City Council

**From:** [Richard Brough](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** FW: SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025  
**Date:** 23 January 2025 09:57:25  
**Attachments:** [image001.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image002.png](#)

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Good morning,

Thank you for the opportunity to comment.

Aberdeen City Council, as a terrestrial authority, primarily focuses on the potential impacts within the intertidal zone that falls between mean high-water springs (MHWS) and mean low water springs (MLWS) when it comes to offshore infrastructure projects, and associated on shore infrastructure. In this case, the Hawthorn Pit Grid Connection is out with Aberdeen City Council's area of interest, and we have no comments.

Regards

**Richard Brough** | - Senior Environmental Planner

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Aberdeen City Council | Climate and Environment Policy | Strategic Place Planning | Commissioning  
Ground Floor North | Marischal College | Broad Street | Aberdeen | AB10 1AB

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Aberdeen  
**Adapts**



# Aberdeen International Airport

**From:** [#ABZ\\_Safeguarding](#)  
**To:** [MD\\_Marine\\_Renewables](#)  
**Cc:** [Lauren\\_Cowan](#); [Benjamin\\_Taylor](#)  
**Subject:** RE: 250205 - SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Nil Returns  
**Date:** 06 February 2025 11:18:42  
**Attachments:** [image001.png](#)  
[image043099.png](#)  
[image087640.png](#)  
[image593782.png](#)  
[image033685.png](#)  
[image584649.png](#)  
[image169828.png](#)  
[image058967.png](#)  
[image640878.png](#)  
[image032339.png](#)

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Thanks Benjamin, confirm there is no objection from Aberdeen Airport for the grid connection works.

Kind regards  
Kirsteen



#ABZ Safeguarding

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

🌐 [www.aberdeenairport.com](http://www.aberdeenairport.com)

📍 Aberdeen International Airport Limited, Dyce, Aberdeen, AB21 7DU

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# Aberdeenshire Council

Our Ref: ENQ/2024/1832

Your Ref:

Ask for: Elizabeth Tully

Tel: 01467 533417

Email: elizabeth.tully@aberdeenshire.gov.uk

Marine Directorate  
Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

22 January 2025

Dear Sir/Madam

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS  
2007 (“the MW 2007 Regulations”)**

**CONSULTATION UNDER SCHEDULE 4, REGULATION 6 OF THE MW 2007  
REGULATIONS.**

**Proposal: Consultation on Request for a Scoping Opinion Under The Marine Works  
(Environmental Impact) Regulations 2007 for the Morven Offshore Windfarm-  
Hawthorn Pit Grid Connection**

**Site: Morven Offshore Wind Farm,**

Thankyou for your consultation to Aberdeenshire Council regarding a Scoping request for the proposed Morven Offshore Wind Farm (your ref: SCOP-0058).

Aberdeenshire Council, as a terrestrial authority are generally concerned with any potential effects upon natural heritage and archaeological features within the intertidal zone between mean high-water springs (MHWS) and mean low-water springs (MLWS) caused by the proposed development. It is noted that landfall for the proposed development will be made around the Seaham area in County Durham. As such, there will be no impact upon the intertidal zone in the Aberdeenshire area and we would therefore have no comment to make.

In terms of the offshore array location, Aberdeenshire Council Archaeology are content with the impacts proposed to be scoped into the project assessment for marine archaeology (as per table 7.61); the designed in measures and mitigation (as per section 7.10.7 and table 7.62 and the proposed assessment methodology as per section 7.10.8.

This opinion will be held for public inspection for a two year period.

Should you wish to discuss any matters relating to this issue please contact the above named officer.

Yours faithfully

[Redacted]

Paul Macari  
Head of Planning and Economy

# Angus Council



**From:** [Stephanie G Porter](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Benjamin Taylor](#)  
**Subject:** RE: SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025  
**Date:** 23 December 2024 09:48:06  
**Attachments:** [image001.png](#)

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Dear Benjamin,

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2007 (“the MW 2007 Regulations”)  
CONSULTATION UNDER SCHEDULE 4, REGULATION 6 OF THE MW 2007  
REGULATIONS.  
SCOP-0058 – Morven Offshore Wind Limited – Hawthorn Pit Grid Connection**

I refer to your email below and can confirm this service has no comments to make in relation to the scoping request regarding the above development.

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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BT

**From:** [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Lauren Cowan](#); [Benjamin Taylor](#); [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)  
**Subject:** WID13673 - OP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025  
**Date:** 03 January 2025 13:13:47  
**Attachments:** [image003.png](#)  
[image005.png](#)

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**BT Group**

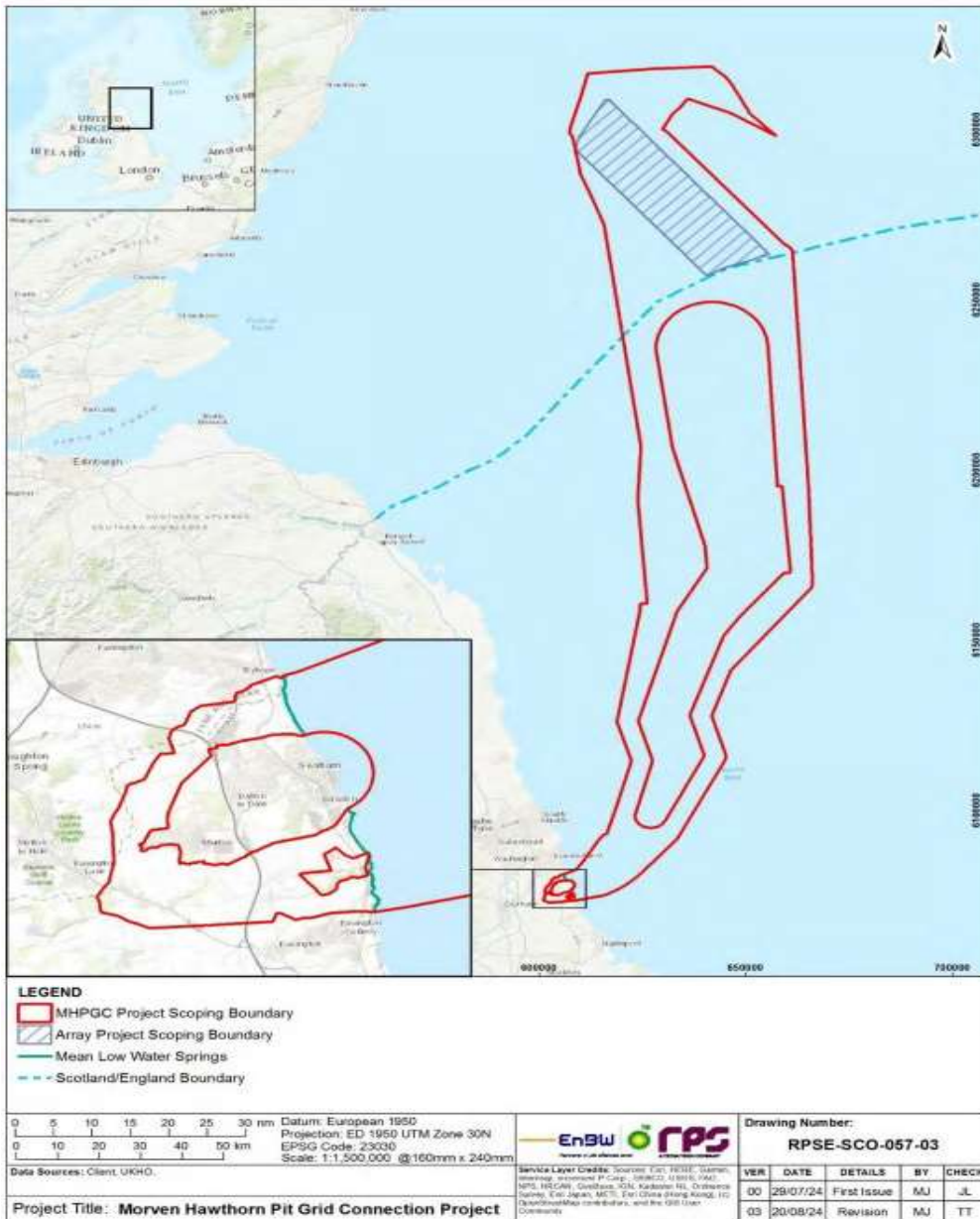
-  
**OUR REF: WID13673**

-  
We have studied this proposal using the scoping boundary below with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that this proposal should not cause interference to BT's current and presently planned radio network.

BT requires 100m minimum clearance from any structure to the radio link path. If there are any changes please let us know and we will reassess this for you.

Please note this refers to BT Radio Links only, you will need to contact other providers separately for information relating to other supplier links / equipment.



**Figure 3.1: Location of the Morven Hawthorn Pit Grid Connection Project Scoping Boundary**

Kind Regards

**Lisa Smith**  
 National Radio Planner  
 Network Planning



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# City of Edinburgh Council

**From:** [Keith Miller](#) on behalf of [cityplan2030](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Lauren Cowan](#); [Benjamin Taylor](#)  
**Subject:** RE: SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025  
**Date:** 23 December 2024 09:35:22  
**Attachments:** [image002.png](#)  
[image005.png](#)

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Good morning Lauren,  
Thank you for your email. The Council does not intend to submit any comments to this scoping opinion related to an offshore proposal.

Kind regards

Keith Miller

Keith Miller | Senior Planning Officer | Development Planning | Planning & Building Standards | Sustainable Devt | Place Directorate | The City of Edinburgh Council | Waverley Court, Level 2.4, 4 East Market Street, Edinburgh, EH8 8BG | [keith.miller@edinburgh.gov.uk](mailto:keith.miller@edinburgh.gov.uk) | [www.edinburgh.gov.uk](http://www.edinburgh.gov.uk)

You can access our services at [www.edinburgh.gov.uk/planning-building](http://www.edinburgh.gov.uk/planning-building) and follow the [Planning Edinburgh](#) blog for updates on our service.

**City Plan 2030 is now our adopted local development plan and will be used to inform planning decisions. See our [webpage](#) for more information.**



Dee DSFB





# Dee District Salmon Fishery Board

Benjamin Taylor  
Marine Licensing and Consenting Casework Officer  
Licensing Operations Team  
Marine Directorate  
Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

By email to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)  
3<sup>rd</sup> February 2025

Dear Benjamin,

**REQUEST FOR SCOPING OPINION FOR THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (“the MW 2007 Regulations”) CONSULTATION UNDER SCHEDULE 4, REGULATION 6 OF THE MW 2007 REGULATIONS.**

SCOP-0058 – Morven Offshore Wind Limited – Hawthorn Pit Grid Connection

On behalf of the Dee District Salmon Fishery Board (Dee DSFB) we welcome the opportunity to respond to the ***Morven Offshore Wind Limited – Hawthorn Pit Grid Connection - 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***

At the latest International Union for Conservation of Nature (IUCN) species reassessment of the Red List of Threatened Species, released at COP28 in December 2023, Atlantic salmon have been reclassified from 'Least Concern' to 'Endangered' in Great Britain (as a result of a 30-50% decline in British populations since 2006 and 50-80% projected between 2010-2025), and from 'Least Concern' to 'Near Threatened' in terms of global populations (as a result of global populations declines of 23% since 2006).

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 echo the comments of our representative body for Scotland's District Salmon Fishery Boards, Fisheries Management Scotland and call for more research upon the impacts of this development on diadromous fish.

Under Scottish Marine Energy Research (ScotMER), the [Diadromous Fish Receptor Group](#) has identified evidence gaps related to the health, distribution, and impacts on Diadromous fish (salmon, sea trout, etc.). Scottish Government has published an 'evidence map' (available for download at the above link) which identifies and scores these evidence gaps according to a specific prioritisation process. A recent [report](#) commissioned by Scottish Government titled "Diadromous Fish in the Context of Offshore Wind – Review of Current Knowledge & Future Research" highlights further strategic research opportunities and areas for consideration.

It is important that the relevant evidence gaps are considered in full by the applicant, and developers should contribute to filling these evidence gaps as a **specific condition of consent**.

To properly assess Environmental Statements for developments, information on the use of the development area by diadromous fish should be provided. If such information is lacking then a suitable monitoring strategy should be devised, either for the area in question or through contributing to strategic projects undertaken through ScotMER. Any monitoring strategies must include pre-construction monitoring in order that baseline information on movement, abundance, swimming depth, feeding behaviour etc. can be collected.

Offshore developments have the potential to directly and indirectly impact diadromous fish. We would therefore expect developers to assess and, where necessary, mitigate the potential impacts of the development. These potential impacts have been highlighted through ScotMER, and include:

- Avoidance (including exclusion from particular rivers and subsequent impacts on local populations);
- Disorientation effects that could potentially affect behaviour, susceptibility to predation or by-catch; and
- Impaired ability to locate normal feeding grounds or river of origin; and delayed migration

The following issues should therefore be considered in full, including consideration of new research where information is lacking:

*i. Subsea noise and vibration effects during construction*

This includes noise associated with horizontal directional drilling and installation of rock armour on cable routes. Avoidance of such activities during key life stages, such as the smolt run, should be considered as a mitigation measure.

*ii. Electromagnetic fields (EMFs) arising from cabling*

Electromagnetic fields from subsea cables have the potential to interact with European eels and possibly salmonids if their migration or movement routes take them over sub-sea cables. The Earth's magnetic field is a cue used for migration, so anything that interferes with this signal is an important consideration. All cables should be buried to at least a depth of 1.5m where possible, or covered with rock armour to an equivalent depth where burial is not possible. We are aware that Marine Scotland Science have undertaken some research to investigate electro-magnetic force impacts on adult and post smolt salmon and European eels.

Whilst for salmon this work did not demonstrate any significant response to the magnetic field in terms of alarm, avoidance, accelerated or decelerated swimming, it did not provide any information on interference with the salmon's ability to detect and utilise the Earth's magnetic field.

*iii. Disturbance or degradation of the benthic environment (including secondary effects on prey species)*

It is important to ensure that such effects are quantified and assessed in the Environmental Statement. Particular consideration should be given to potential effects on important habitats for feeding and shelter for the marine phase of sea trout (a priority marine feature) and any area that might impact early feeding opportunities for all diadromous species.

*iv. Changes in light patterns from turbine blades*

Potential impacts from changes in light patterns from turbine blades on fish is a very understudied field. Although there is a lack of direct studies, it is plausible that turbine blade shadow flicker and secondary light patterns from turbine structures may have a potentially negative impact on Atlantic salmon or other fish species at offshore wind farm sites.

*v. Novel habitat construction (artificial reef effect)*

The construction of new offshore structures can lead to various ecological changes, including the introduction of physical barriers, shifts in community composition, altered predator-prey dynamics, increased disease risk, higher levels of suspended sediment, and changes in fishing activity. Further research is needed to understand the impact of these changes on both adult and juvenile Atlantic salmon, which migrate through offshore wind farms, as well as sea trout, which not only migrate but also spend a significant portion of their marine life developing in these affected areas.

## **Conclusion**

We have no wish to prevent or delay any proposed development unnecessarily and we remain keen to work constructively with the developers and Marine Directorate to identify appropriate monitoring programmes which will allow us to be able to assess the acknowledged risks of this development, and other proposed developments in a more appropriate manner. There is a clear and urgent need to fund, plan and start strategic research on the movement, abundance, swimming depth, feeding behaviour and impact pathways relevant to diadromous fish. Such research would clearly feed into the potential mitigation measures that might be deemed appropriate, and the conditions under which such mitigation should be enacted. Developers should be required to work together to fund strategic monitoring, in order to allow more certainty for all involved.

Yours sincerely

[Redacted]

Jamie Urquhart

Fisheries Protection Manager, Dee District Salmon Fishery Board

# Dundee City Council

**From:** [Laura Stewart](#)  
**To:** [MD Marine Renewables](#); [Benjamin Taylor](#)  
**Subject:** FW: SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025  
**Date:** 27 December 2024 16:42:01  
**Attachments:** [image001.png](#)

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Good afternoon

I can confirm that Dundee City Council has no comments to make on the Scoping Opinion.

Kind Regards  
Laura



**Laura Stewart**  
Senior Planning Officer (Planning & Economic Development) at Dundee City Council

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**E** [laura.stewart@dundeecity.gov.uk](mailto:laura.stewart@dundeecity.gov.uk)

**P** [01382 434457](tel:01382434457)

**W** [www.dundeecity.gov.uk](http://www.dundeecity.gov.uk)

**A** [Dundee House, 50 North Lindsay Street, DUNDEE, DD1 1QE](#)

---

# Edinburgh Airport

**From:** [Safe Guarding](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Safe Guarding](#)  
**Subject:** SCOP-0058 – Morven Offshore Wind Limited – Hawthorn Pit Grid Connection  
**Date:** 09 January 2025 16:04:41  
**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**

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My working hours are Monday-Friday  
[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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# Fife Council

**From:** [Scott Simpson](#)  
**To:** [Lauren Cowan](#); [MD Marine Renewables](#); [Benjamin Taylor](#)  
**Subject:** 24/03339/CON - Consultation under Schedule 4, Regulation 6 of the MW 2007 Regulations for SCOP-0058 – Morven Offshore Wind Limited, Hawthorn Pit Grid Connection  
**Date:** 30 January 2025 11:12:19  
**Attachments:** [Outlook-uqkasr3t.png](#)

---

Dear Lauren

Thank you for the consultation request regarding the above Scoping opinion. I can confirm that Fife Council as Planning Authority has no comment regarding the submitted scoping report.

Kind regards

Scott Simpson  
Planner  
Major Business and Customer Service  
Planning Services  
Fife House  
North Street  
Glenrothes  
KY7 5LT

If you are an applicant or agent submitting plans or other information relating to a specific planning application please **upload** them via [www.eplanning.scot](http://www.eplanning.scot) as Post Submission Additional Documentation (PSAD).

If you wish to comment on or track the progress of an application, please use the Fife Council [online planning service](#).

Online Information/forms relating to payments or reporting unauthorised works can be done on our website at [www.fife.gov.uk/planning](http://www.fife.gov.uk/planning).

All other enquiries should be directed to - [development.central@fife.gov.uk](mailto:development.central@fife.gov.uk). This will help us to respond to your enquiry as quickly and efficiently as possible.

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\*\*\*\*\*

# Forth Ports

**From:** [Sandra Robson](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Lauren Cowan](#); [Benjamin Taylor](#)  
**Subject:** RE: SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response  
Required by 31 January 2025  
**Date:** 31 January 2025 11:09:19  
**Attachments:** [image001.png](#)

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Good morning

I can confirm Forth Ports has no comment with regard to the above below matter

Kind regards

**Sandra Robson** | PA to the Chief Legal and Property Officer | Forth Ports Limited

Head Office | 1 Prince of Wales Dock | Edinburgh | EH6 7DX

T: 0131 555 8709 | Mob: [Redacted] | <https://forthports.co.uk>

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# Historic Environment Scotland



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

**By email:**

MD.MarineRenewables@gov.scot

Benjamin Taylor  
Licensing Operations Team  
Marine Directorate (Glasgow)

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

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

Our case ID: 300077501  
Your ref: SCOP-0058  
24 January 2025

Dear Benjamin Taylor

**The Marine Works (Environmental Impact Assessment) (Scotland)  
Regulations 2017  
SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection  
Comments on scope of proposed Environmental Impact Assessment**

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 20 December 2024. 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.

**Proposed development**

We understand that the proposed development comprises the offshore export cables for the Morven Offshore Wind Farm, to a maximum total length of 341km. The maximum number of cables will not exceed 6. Parts of these cables are in Scottish Waters

**Scope of assessment**

We recommend that the applicant refers to the [EIA Handbook](#) for best practice advice on assessing cultural heritage impacts.

We have not identified any likely significant effects on our historic environment interests. We therefore have no advice to offer on the scope of assessment.

From 1 January 2025 we no longer provide advice on undesignated underwater cultural heritage. This includes the preparation of documents for post-consent activities including Written Schemes of Investigation or Protocols for Archaeological Discoveries. For EIA projects, the relevant competent authority must ensure that they have access to sufficient expertise to examine the EIA Report in accordance with the relevant regulations.

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

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

### Further information

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. HEPS is supported by our [Managing Change guidance series](#).

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, [hmconsultations@hes.scot](mailto:hmconsultations@hes.scot). If you have questions about this response, please contact Mary MacLeod Rivett at [mary.macleod@hes.scot](mailto:mary.macleod@hes.scot).

Yours sincerely

**Historic Environment Scotland**

# Maritime and 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-0058

Date: 27<sup>th</sup> January 2025

Lauren Cowan  
Licensing Operations Team  
Marine Directorate  
Scottish Government  
Atlantic Quay  
Glasgow  
G2 8LU

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

Dear Lauren,

**REQUEST FOR SCOPING OPINION FOR MORVEN OFFSHORE WIND LIMITED UNDER THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007 (“the MW 2007 Regulations”) AND CONSULTATION UNDER SCHEDULE 4, REGULATION 6 OF THE MW 2007 REGULATIONS.**

The MCA has reviewed the scoping report provided by Morven Offshore Wind Limited for the Morven Offshore Wind Farm Hawthorn Pit Grid Connection Project as detailed in your correspondence of 20<sup>th</sup> December 2024. We acknowledge that this consultation relates to the offshore elements of the proposed works in Scottish waters only (as illustrated in figure 3.1) and not the onshore elements of the proposed works or the offshore elements of the proposed works in English waters. We 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>.

Paragraph 7.9.4 and table 7.53 state that appropriate traffic data has been collected in accordance with MGN 654, which includes two 14-day marine vessel traffic surveys in winter 2023 (1<sup>st</sup> February – 14<sup>th</sup> February) and summer 2023 (1<sup>st</sup> July – 14<sup>th</sup> July). As the scope of this report concerns mainly cable laying areas and no fixed structures are planned, then AIS only data is acceptable on this occasion.

We note in Chapters 4 and 11, that a Cumulative Effects Assessment will be carried out. The applicant acknowledges that 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 can continue safely without unacceptable deviations. The proximity to the Ossian and Bowdun projects will be of particular focus and continued dialogue with the developers of these sights is to be encouraged.

As previously acknowledged, this consultation relates to the offshore elements of the proposed works in Scottish waters only and primarily concerns cable installation. Therefore, where applicable, the following should be considered: 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. The development of a Cable Specification and Installation Plan and planned monitoring of cable protection (Table 7.5, Mitigations MM-10 and MM-11 respectively) are welcomed by the MCA.

As stated in 3.3.1.2 although Morven offshore wind farm does include construction of Offshore Substation Platforms (OSPs) they are outside scope of this report and will be assessed within the Morven Offshore Wind Array Project EIA to be submitted to Marine Directorate. Therefore, as no fixed structures are planned for this part of the project a SAR checklist and full Emergency Response Co-operation Plan (ERCoP) are not required. A Marine Emergency Action Card (MEAC) is considered appropriate for this part of the project when considered in isolation.

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 Chapter 3, table 3.13 that HVDC transmission infrastructure will be 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 a 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).

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

Yours faithfully,

**[Redacted]**

Vaughan Jackson  
Offshore Renewables Project Lead  
UK Technical Services Navigation

MAU

## Morven Offshore Wind Farm – Hawthorn Pit Grid Connection

### **Marine Analytical Unit (“MAU”) Response Marine Directorate**

The Morven Hawthorn Pit Grid Connection Development scoping report includes descriptions of a range of potential impacts. The project covers both Scottish and English waters. This response focuses only on the assessment of social and economic impacts that pertain to the part of the project in Scottish waters.

The scoping response focuses on the grid connection infrastructure only, whilst the offshore wind farm scoping report was submitted in July 2023.

#### **1. Overview**

##### *1.1. Study areas*

We note that Durham County Council and Sunderland City Council areas have been identified as a local study area for socioeconomic impacts, with the project making landfall on the English coast. We also note that the socio-economic impacts will be assessed at the English, Scottish and UK economy level. We note that in Scotland, this project is entirely offshore beyond 12nm from the coast.

##### *1.2. Consultation, stakeholder engagement, and primary data collection*

We note consultation conducted to date in England, alongside planned future consultation. We cannot comment on this consultation as it is outside of Scotland. It is recognised that in Scotland, this grid connection project is entirely offshore, and that there is no mandatory requirement for Pre-Application Consultation, although technical consultation will be taking place (5.1). We note that the primary focus of socio-economic assessment in this project is the area of landfall in England (not Scotland) (9.4)...

##### *1.3. Data sources*

Please use the most up-to-date data sources.

#### **2. Scoping of impacts**

##### *2.1. Social impacts*

No social impacts have been scoped in for Scotland (9.4).

##### *2.2. Economic impacts*

Given the scale of this project, MAU agree that only economic impacts on Scotland will be assessed. Our response to the proposed assessment approach is outlined below, and we would expect any assessment to be commensurate with the envisaged impacts.

We broadly agree with the proposed approach for assessing economic impacts, in particular that the assessment will include direct, indirect and induced impacts for all phases of the project. We recommend that the assessment takes into account deadweight, leakage, displacement and substitution, and that sensitivity analysis will be performed to account for risk, uncertainty and optimism bias. Please refer to our guidance shown in Annex 1 for further information.

The scoping report outlines that employment impacts will be assessed at each phase of the project in terms of years of employment and jobs. If it is possible to supply additional information about the types of jobs that are expected to be created (e.g. part-time, full-time, skilled, unskilled etc) and how these compare to the existing jobs in the study area, this will add further depth to the analysis.

We expect to see a detailed description of the methodology used to assess economic impacts in the assessment, 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.

### **3. Conclusions**

Given proportionality, we agree with the proposed approach for assessing economic impacts and the scoping out of social impacts for Scotland is reasonable

# **Annex 1: General Advice for Socio-Economic Impact Assessment Marine Analytical Unit (MAU) Marine Directorate October 2024**

Note that it is for the contractor to utilise this guidance as they see fit and not all aspects are necessarily relevant. In this case, only economic impacts are being assessed.

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

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

- Take a proportionate approach to SEIA in line with the size 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 (see Methods Toolkit referenced at the end of this Annex) 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 Directorate 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 loss;
- 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 (e.g. 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

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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

#### 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

#### 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="http://statistics.gov.scot">statistics.gov.scot</a>
Marine Economic Statistics	Annual economic statistics publication including GVA and employment data for marine economy sectors.	<a href="http://www.gov.scot">Marine economic statistics - gov.scot (www.gov.scot)</a>

<p>Scottish Sea Fisheries Statistics</p>	<p>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 fishing fleet and employment on Scottish vessels.</p>	<p><a href="http://www.gov.scot">Sea fisheries statistics - gov.scot (www.gov.scot)</a></p>
<p>Scottish Shellfish Farm Production Survey 2022</p>	<p>Statistics on employment, production and value of shellfish from Scottish shellfish farms.</p>	<p><a href="http://www.gov.scot">Scottish Shellfish Farm Production Survey 2022 - gov.scot (www.gov.scot)</a></p>
<p>Scottish Annual Business Statistics 2020</p>	<p>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.</p>	<p><a href="http://www.gov.scot">Scottish Annual Business Statistics 2020 - gov.scot (www.gov.scot)</a></p>
<p>Sub-Scotland Economic Statistics Database</p>	<p>The Sub-Scotland Economic Statistics Database provides economic, business, labour market and population data for Scotland, and areas within Scotland.</p>	<p><a href="http://www.gov.scot">Sub-Scotland Economic Statistics Database - gov.scot (www.gov.scot)</a></p>
<p>Nomis Official Labour Market Statistics</p>	<p>Labour market statistics including data on employment, unemployment, qualifications, earnings etc.</p>	<p><a href="http://nomisweb.co.uk">Nomis - Official Labour Market Statistics (nomisweb.co.uk)</a></p>
<p>Economics of the UK Fishing Fleet 2020</p>	<p>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.</p>	<p><a href="http://www.seafish.org.uk">Economics of the UK Fishing Fleet 2020 — Seafish</a></p>
<p>Scotland's Census, National Records of Scotland</p>	<p>Census data that provides information about the characteristics of people and households in the country.</p>	<p><a href="http://nrscotland.gov.uk">Scotland's Census   National Records of Scotland (nrscotland.gov.uk)</a></p>

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="http://www.gov.scot">Scottish Index of Multiple Deprivation 2020 - gov.scot (www.gov.scot)</a>
National Records of Scotland mid-year population data	Population estimates on an annual basis for Scotland and its constituent NHS Board and council areas.	<a href="http://nrscotland.gov.uk">Mid-Year Population Estimates   National Records of Scotland (nrscotland.gov.uk)</a>
The Green Book	HM Treasury guidance on how to appraise and evaluation policies, projects and programmes.	<a href="http://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="http://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="http://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](http://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](http://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](http://www.gov.scot)

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

A toolkit of methods available to assist developers, consultants, and researchers carrying out socio-economic impact assessments: [Methods Toolkit for Participatory Engagement and Social Research - gov.scot \(www.gov.scot\)](http://www.gov.scot)

MD-SEDD





E: [MD-SEDD-RE\\_Advice@gov.scot](mailto:MD-SEDD-RE_Advice@gov.scot)

Lauren Cowan  
Marine Directorate Licensing Operations Team  
Marine Laboratory  
375 Victoria Road  
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AB11 9DB

**29/01/2025**

### **MORVEN OFFSHORE WIND FARM – HAWTHORN PIT CONNECTION**

Marine Directorate advisers have reviewed the request from MD-LOT and provide the following advice.

#### **Commercial Fisheries**

##### Data

MD-SEDD advise against the reliance of Marine Management Organisation (MMO) surveillance sightings for informing the baseline. This data has a sampling bias due to risk-based taskings in Scotland leading to uneven survey effort, so may not give an accurate representation of fishing activity across the study area. It can however be used to give an indication of the nationality of vessels present in the area, and can be used to corroborate information from other sources.

MD-SEDD advise that VMS datasets are used in the EIA to produce spatial maps of fishing activity for individual gear types (e.g. demersal trawl), as well as looking at the combined value across all fishing methods. This will help to visualise different fleets' activity. When using MMO VMS datasets, MD-SEDD advise that the data is used to present figures showing both average VMS value and also fishing effort (kW per hour). Areas of high effort may not necessarily equate to areas of high value so it is advised to visualise the fishing



activity using both indices. This will provide further information about the commercial fisheries baseline and help in the assessment of possible displacement of fishing effort.

MD-SEDD advise the use of fisheries sensitivity maps and the associated webtool from the recently concluded FiSMaDiM (Fisheries Sensitivity Mapping and Displacement Modelling) project, which may be helpful for assessing fisheries displacement. The project outputs can be accessed here ([Case Study - Cefas \(Centre for Environment, Fisheries and Aquaculture Science\)](#)). Please note that the webtool for the sensitivity maps will be released soon.

### Mitigation

MD-SEDD note that where cable protection is used, it will follow industry standard guidelines in terms of slope angle and rock grading. The fishing industry have raised concerns over the use of concrete mattresses in open areas of seabed and therefore MD-SEDD advise that other methods such as rock placement are utilised first where possible, before the use of concrete mattresses.

MD-SEDD note that boulder removal may be required during the seabed preparation. MD-SEDD advise that the location of large boulders that are relocated during construction and may pose a snagging risk for fishing gear must be disclosed to the fishing industry within a timely manner. MD-SEDD note that the final location of cables will be provided to Kingfisher Information Service, Offshore Renewable and Cable Awareness project (KISORCA) and advise this is also done within a timely manner.

### Guidance

MD-SEDD advise new guidance on monitoring commercial fisheries in relation to offshore wind farms will be published by the Scottish Government in the coming months and may be useful to the applicant during the EIA stage.

## **Oceanography**

The MD-SEDD oceanography advisor has reviewed section 7.1 of the Morven Howthorn Pit Grid Connection Project EIA scoping report. MD-SEDD agree with the identified potential impacts on suspended sediment, seabed morphology and sediment transport pathways. These potential impacts have all been scoped into the EIA in some form, with them being scoped out of some phases (construction/operation/decommissioning) of the development. MD-SEDD agree with the proposed scope of EIA and the with the proposed modelling methodology (which appears to follow industry best practice). There was no detail on the proposed length of numerical modelling simulations, and MD-SEDD advice that at least one spring neap tidal cycle should be modelled. MD-SEDD also advice that if the baseline description shows that the residual circulation in the region varies through the year then the numerical simulations should be performed for at least two time periods representing the two residual circulation extremes.

Yours sincerely,

## **Renewables and Ecology Team**

Marine Directorate – Science, Evidence, Data and Digital

Ministry of Defence  
- Defence  
Infrastructure  
Organisation

**From:** [DIO-Safeguarding-Offshore \(MULTIUSER\)](#)  
**To:** [MO Marine Renewables](#)  
**Subject:** 20250213\_MOD\_Safeguarding\_Response\_Consultation\_SCOP-0058\_Morven Offshore Wind Limited\_Hawthorn Pit Grid Connection\_DIO\_Ref\_10066067  
**Date:** 13 February 2025 08:24:33  
**Attachments:** [image002.png](#)  
[image003.png](#)

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**FAO: Benjamin Taylor.**

Good morning,

Thank you for your email in respect to consultation - SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection. I can confirm that from the information provided in the Environmental Impact Assessment Scoping Report, MOD Safeguarding have no objection to the proposal that relates only to the offshore elements of works within Scottish waters.

Please note that my colleague responded on the 02 Jan 2024 to consultation SCOP-0028 – Morven Offshore Wind Limited – Morven Offshore Wind Farm - Array only, the MOD safeguarding response to that consultation remains extant and should be read in conjunction with this response.

Should you have any questions please do not hesitate to contact me.

Kind regards,

**Joanne Moore | Safeguarding Officer**

Defence Infrastructure Organisation  
Estates | Safeguarding  
DIO Head Office | St George's House | DMS Whittington | Lichfield | Staffordshire | WS14 9PY  
Email: [joanne.moore243@mod.gov.uk](mailto:joanne.moore243@mod.gov.uk)

NATS

**From:** [NATS Safeguarding](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Lauren Cowan](#); [Benjamin Taylor](#)  
**Subject:** RE: SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025 [SG38670]  
**Date:** 17 January 2025 11:29:03  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)

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Our Ref: SG38670

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

E: [natssafeguarding@nats.co.uk](mailto:natssafeguarding@nats.co.uk)

4000 Parkway, Whiteley,  
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NATS Internal

**From:** MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>

**Sent:** Friday, December 20, 2024 12:12 PM

**To:** MD.MarineRenewables@gov.scot

**Cc:** Lauren.Cowan@gov.scot; Benjamin.Taylor@gov.scot

**Subject:** [EXTERNAL] SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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# Natural England

Date: 07/02/2025  
Our ref: 497388  
Your ref: SCOP-0058



**Licensing Operations Team,  
Marine Directorate**  
Scottish Government  
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**BY EMAIL ONLY**

Dear Benjamin Taylor,

**Schedule 4, Regulation 6 of The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2007 (“the MW 2007 Regulations”)**

**SCOP-0058 – Morven Offshore Wind Limited – Morven Hawthorn Pit Grid Connection Project**

Thank you for your consultation dated 20 December 2024 consulting Natural England on the Environmental Impact Assessment (EIA) Scoping Report. The following constitutes Natural England’s formal statutory response; however, this is without prejudice to any comments we may wish to make in light of further submissions or the presentation of additional information.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

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). Due to our remit, we focus our advice on impacts from the Scottish portion of the cable on English habitats and species. As the project is located partly in Scottish waters the advice from NatureScot, the statutory nature conservation body in Scotland, should be sought.

We direct the applicant to our guidance on *Nature conservation considerations and environmental best practice for subsea cables for English Inshore and UK offshore waters* (September 2022). This is available on our Sharepoint page here: [Environmental considerations for offshore wind and cable projects - Home](#). Please note that you will need to request access to that page (via a pop-up) which should be granted within three days.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission.

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<sup>1</sup> *Harrison, J in R. v. Cornwall County Council ex parte Hardy (2001)*

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities Office of the Deputy Prime Minister (April 2004) available from* <http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/>

## Summary of Main Points

### 1. Approach to scoping

It is noted that due to the timing of the scoping report the information contained within it is extremely high level and based on a large area of search. The rationale for the inclusion of these large boundaries is due to substantial components of the projects remaining undetermined at the point of scoping, but also other aspects including incomplete data collection.

This makes it difficult to provide targeted advice on the scope of the assessments at this stage and could create consenting risks further down the line with identifying and resolving environmental impacts/concerns.

Additionally, we highlight that because we are unable to confirm with a high level of confidence that the data collection proposed will be sufficient to inform the assessments, we are also unable to advise on the potential scale and level of risk this project may pose to nature conservation receptors.

### 2. Cross border effects

Natural England recognise that the Scottish-English border isn't a "boundary" in the sense of "EIA transboundary effects". In the Environmental Statement, Natural England advise that quantification of impacts must be presented showing the impacts of the Scottish portion of the cable on English receptors. For example, sediment suspension from the Scottish cable laying and the potential for mobilized sediment to be deposited in English waters. This is so that we can provide appropriate advice to different regulators on this project.

### 3. Use of other windfarm data

Natural England notes that the applicant will source data from other offshore windfarm projects (e.g. Berwick Bank and Seagreen) and advise that care should be taken when interpreting data from other projects as they are in different locations to the scoping boundary for the proposed cable. Natural England will have higher confidence in assessments based on locally sourced data.

In accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again if the proposal is amended in any way which significantly affects its impact on the natural environment.

Please note that Natural England must be consulted on Environmental Statements and Application documents. We advise that sufficient time should be given to thoroughly assess the survey data, have consultation on this data, and implement actions where necessary prior to submission.

Please send any new consultations or further information on this consultation to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely,

Caroline Jewell  
Northumbria Area Team

NatureScot

Benjamin Taylor  
Marine Licensing & Consenting Casework Officer  
Marine Directorate - Licensing Operations Team  
Scottish Government – Victoria Quay  
Edinburgh  
EH6 6QQ

12 February 2025

Our ref: CNS / REN / OSWF / E1 –  
Morven – Pre-application

By Email only: [md.marinerenewables@gov.scot](mailto:md.marinerenewables@gov.scot)

Dear Benjamin,

**Morven Offshore Wind Limited – Hawthorn Pit Grid Connection**

**NatureScot advice on the Environmental Impact Assessment (EIA) Scoping Report**

Thank you for consulting us on the EIA Scoping Report submitted by Morven Offshore Wind Limited for the proposed Morven Hawthorn Pit Grid Connection (MHPGC).

We have previously been consulted and provided advice (24 August 2023) on the Morven Offshore Wind Array Scoping Report.

[Redacted]

[Redacted]

[Redacted] Whilst we understand that seeking separate consents is due to uncertainty around grid connections, it does raise concerns that not all potential impacts will be assessed to enable full consideration of the proposal and mitigation options.

At this stage, we advise that we have concerns over the consenting strategy as highlighted above and recommend that the generation and grid connection elements are contained within one EIA Report.

Our advice on the natural heritage interests to be addressed within the EIA Report to support the proposed Marine Licence application for the MHPGC relates to the Scottish element of the proposal, which is located entirely within offshore waters.

### **Policy context**

We are currently facing two crises, that of climate change and biodiversity loss and as the Scottish Government's adviser on nature, our work seeks to inspire, enthuse and influence others to manage our natural resources sustainably. We recognise that this proposed development is a lease awarded through the ScotWind Leasing Round in an area identified through the Sectoral Marine Plan process for Offshore Wind Energy.

We seek to provide advice that is enabling and secures the right development in the right place with most benefit for climate change reduction and that which avoids damage, and where possible, achieves enhancement and restoration of biodiversity.

### **Proposal**

As noted above and detailed in the 'Introduction' section (page 1) of the Scoping Report, a Scoping Opinion is being sought for the grid connection from within the Morven Offshore Wind Array area to Hawthorn Pit only. [REDACTED]

It is also not clear from the Scoping Report how the export cables will connect to the offshore substation platform(s) within the Morven Array and whether that element of the proposal is included within the MHPGC proposal.

Our understanding from the Scoping Report (Table 3.2) is that the components of the MHPGC proposal will follow a Project Design Envelope (PDE) approach and with respect to the Scottish elements of the proposal include:

- Offshore:
  - Up to 6 export cables, with a maximum length of up to 80 km;
  - Maximum width of cable corridor up to 1.5 km;
  - Cable burial options include jet trenching, mechanical trenching, dredging, ploughing, controlled flow excavation, rock cutting and backfilling;
  - Target cable burial depth of between 0.5 – 2.5 m; and
  - Cable protection options include burial, concrete mattresses, rock placement, rock bags, grout bags, cement bags, sandbags, articulated pipes, cast iron shells, band restrictors / stiffeners, cable protection systems and frond mats.

It is noted in Table 3.2 that frond mats may be used for cable protection. We do not wish to see frond mats used due to the likelihood of introducing polypropylene (plastic) particles into the marine environment.

Our advice provided below is with respect to the portion of the export cable located in Scottish waters only.

## Content of the Scoping Report

We are generally content with the format of the EIA Scoping Report, which is well laid out and relatively easy to navigate to find narrative relevant for the Scottish portion of the proposal.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The MHPGC proposal does not include any information in relation to connection infrastructure to the Morven Offshore Wind Array. It is stated in Table 3.1 – ‘overview of permanent infrastructure included within the Morven Hawthorn Pit Grid Connection Project scope’ that the offshore infrastructure includes cables connecting to the offshore substation platform(s) within the Morven Array Area. However, the following section (3.4 – offshore infrastructure), describes the proposed offshore infrastructure in detail but makes no mention of how the cables will connect to the offshore substation platforms. Therefore, we are unable to provide any advice regarding potential impacts of this element of the proposal.

Furthermore, a considerable number of cable installation techniques and cable protection measures have been included within the PDE. However, no details have been provided on predicted amounts or potential locations of cable protection. Therefore, our advice is proportionate to the level of detail provided, and uncertainty, within the Scoping Report. If this lack of detail is continued into the Application, it means that there is a greater risk of a worst-case scenario being assessed and a greater level of precaution in the advice provided.

As noted in Paragraph 5.3.5.1 there is no formal requirement for consultation on a Preliminary Environmental Information Report (PEIR) in relation to the marine licence application to MD LOT for the export cable in Scottish waters, however we encourage the Applicant to consider the need for further engagement with us post Scoping Opinion but pre-Application submission.

## EIA Report

The EIA Report provides the assessment to support the application and should be suitably structured with appropriate formatting and sufficient information, with limited repetition, to ensure it can be reviewed efficiently and effectively, particularly in relation to the cross-border nature of the proposal. Consideration should therefore be given to the following aspects:

- It should clearly follow the direction provided in the Scoping Opinion, or where specific agreement was later reached during the pre-application process. Any divergence from this needs to be laid out separately and must be fully justified, as well as being raised in pre-application discussions.
- Consideration should be given to the volume and flow of information within and across each receptor chapter and associated technical appendices. The flow of information relating to impact pathway, assessment and conclusions should be concise, but not omit key information or steps taken. Repeated duplication of text should be avoided through appropriate structuring.
- In electronic versions of the EIA Report, navigational aids including use of hyperlinks etc. are required, particularly where there are supporting technical appendices to any chapters.

- Each stage of the assessment process should be sufficiently transparent to allow the assessments to be repeated. Where specific tools have been used, details of which version and when the assessment was carried out is required.

We expect to be able to easily navigate the assessment and conclusions for impact pathways relevant to the Scottish portion of the export cable proposal. It may be useful to have further engagement on this prior to submission of the EIA Report.

### **Assessment approach**

The EIA Report should consider the impact of all phases of the proposed development on the receiving environment, including effects from pre-construction activities that can emit significant underwater noise e.g. unexploded ordinance (UXO) clearance and some geophysical activities. These activities will also require assessment under European Protected Species (EPS) Licensing, however some consideration of impacts from these activities on EPS will be required within the EIA Report.

It is noted in Paragraph 3.9.1.2 that it is anticipated that offshore cables and any offshore cable protection may be left in-situ during decommissioning. Please note the policy position in Scotland whereby there is a presumption for full removal.<sup>1</sup>

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

#### *Assessment of significance*

The proposed approach for the identification of impacts and assessment of significance is set out in Section 4.5, which includes generic criteria for the definition of resource or receptor sensitivity, magnitude of change and classification of effect.

It is noted in Paragraphs 4.5.1.2 and 4.5.1.3 that for each environmental topic, the categories of sensitivity and magnitude will be defined in the EIA Report and that the conclusion made on whether an effect should be considered significant or not is based on professional judgement.

Although we acknowledge that expert judgement is required when determining sensitivity of receptors and (in some instances) magnitude of impact - in terms of biodiversity, the magnitude of change should generally be expressed in absolute terms and relatively in terms of percentage change to habitat area or species population.

Furthermore, the guidelines for assessing magnitude of effect (Table 4.3) seem inappropriate in their treatment of geographic scale. For example, the criterion 'over the majority of the development area' for a Medium magnitude means that an effect could be assigned a Low magnitude despite covering many tens of square kilometres. For large proposals, such as this, this criterion would only make sense if receptors (natural heritage interests) had similarly been scaled up, which they haven't.

In determining the magnitude of impact, we would also expect the duration of impact to be considered which is missing from Table 4.3. This is likely to be helpful given the limited extent of the proposal in Scottish waters and we recommend that the Applicant consider how best to

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<sup>1</sup> <https://www.gov.scot/publications/offshore-renewable-energy-decommissioning-guidance-scottish-waters/pages/1/>



present the assessment within the EIA Report which allows full consideration of impacts to Scottish interests alone.

In light of the above, we would recommend that the scoring criteria to be used for each of the relevant receptors is discussed and agreed prior to submission of the EIA Report.

#### *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. This assessment should focus on potential impacts across predator prey interactions. This will enable a better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance from the proposed cable on bird and mammal (as well as other top predator) interests and what influence this may have on population level impacts.

#### *Climate change and blue carbon*

The impact of climate change effects should be considered, both in futureproofing the proposal design as well as how certain climate stressors may work in combination with potential effects from the proposed export cable. The EIA Report should also consider the carbon cost of the cable (including supply chain) and to what extent this is offset through the production of green energy.

We note the intention to provide a climate change assessment, including impacts to blue carbon, as part of the EIA Report, with further details provided within Section 9.5, which is welcomed. Just to highlight, the Ossian Offshore Wind Farm EIA Report included a detailed assessment of potential impacts to blue carbon stocks, the approach to which we accepted.

#### *Cumulative impact assessment*

The proposed approach to the cumulative effects assessment (CEA) is outlined in Section 4.7 of the Scoping Report. It is noted in Paragraph 4.7.1.4 that the foundation of the CEA will be a 'whole project assessment' which will consider the different elements of the Morven Offshore Wind Farm [REDACTED] as well as Hawthorn Pit Grid Connection and Branxton Grid Connection, based on the information publicly available at the time the MHPGC proposal is assessed.

As noted above, we recommend that the generation and grid connection elements are contained within one EIA Report to enable full consideration of the proposal, including the requirement for any mitigation and monitoring options at the same time.

Furthermore, it is stated in Paragraph 4.7.2.3 that once a Zone of Influence (Zoi) is identified, a list of plans, projects and activities within that Zoi will be prepared to inform the CEA, known as the CEA long list. This long list will then be screened considering the level of detail available for projects / plans. Projects, plans and activities with a low level of publicly available detail will be screened out from further assessment. We advise the Applicant to consult and seek agreement with MD LOT on which projects, plans and activities should be included within the CEA.

Additional advice in relation to the cumulative impact assessment for each receptor is included in the relevant appendix below.

#### *Mitigation*

We welcome the identification of 'designed in measures' described in Section 4.4.6, Appendix A and included in each of the relevant sections of the EIA Scoping Report.

Mitigation measures can often be most successful when they are considered from the outset of the proposal rather than as a late-stage solution. Therefore, in some cases, mitigation can be incorporated as designed in measures that are truly embedded to avoid or reduce impacts.

However, we note that much of the designed in measures includes the development and adherence to post-consent plans and programmes. Plans and programmes themselves do not constitute mitigation – it is the measures contained within the plan that will mitigate impacts, for which no detail has yet been provided.

For a number of the receptors, it notes that the determination of magnitude and significance will assume the implementation of designed in measures (e.g. Paragraph 7.6.7.2, Section 7.6 - marine mammals). In addition, Paragraph A.1.1.2 states that the EIA will be undertaken assuming designed-in measures will be implemented and as a result, potential effects that might arise prior to the implementation of designed in measures do not need to be identified as there is no potential for them to arise.

Care needs to be taken to ensure that there is a commitment to specific measures in order for these to be truly embedded / designed in mitigation that will reduce impacts and thus could be used in the assessments to reduce the magnitude and significance of effects or ensure there is no potential for significant effects to arise.

In addition, having reviewed Appendix A – ‘designed in measures and mitigation log’, we note that a number of the measures are repeated i.e. MM-6, MM-8, MM-9 and MM-13, are exactly the same and it is unclear why they are listed as separate mitigation measures.

Further advice in relation to designed in measures are included in each of the relevant appendices of our advice.

The full range of mitigation and monitoring measures as well as published guidance should be considered and discussed in the EIA Report.

### **Site selection and consideration of alternatives**

In relation to the information detailed in the site selection and consideration of reasonable alternatives section (Section 6), we note that in Table 6.1, which presents the constraints currently being considered within the options appraisal, there is mention of Marine Conservation Zones but not nature conservation Marine Protected Areas (ncMPAs). The latter are relevant for Scotland and should have been included here.

We welcome the identification of design principles as set out in Table 6.2, which includes avoid / minimise impacts on protected areas and species but omits Priority Marine Features (PMFs). PMFs are habitats and species that we consider to be marine nature conservation priorities in Scottish waters and we advise that consideration of these should have been included.

### **Habitats Regulations Appraisal (HRA) and nature conservation Marine Protected Areas (ncMPA) assessment**

It is noted in Paragraph 1.1.2.3 that an HRA screening exercise will be undertaken at the PEIR stage. Our advice is that we generally advise submission of the HRA Screening Report alongside the EIA Scoping Report as this enables us to consider and provide advice under each assessment process at the same time.

We note and welcome the inclusion of the Marine Protected Area screening exercise within Appendix E of the EIA Scoping Report. We provide advice below in relation to ncMPA requirements for geodiversity, benthic, fish, marine mammal and ornithology features in the relevant appendices.

### **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 it is not currently a policy requirement in Scotland, as part of the need to address both the climate and biodiversity crises, we encourage the Applicant to consider this as part of their submission.

### **Natural heritage interests to be considered**

We provide advice as detailed below within receptor-specific appendices for key natural heritage interests to be considered in the EIA Report:

Regarding seascape, landscape and visual impact assessment (SLVIA), we agree with the conclusion in Section 9.1, that there is no potential for significant impacts across the various phases of the MHPGC proposal for Scotland. We are therefore content for SLVIA to be scoped out of the EIA Report.

- Advice on physical processes is provided in [Appendix A](#).
- Advice on underwater sound is provided in [Appendix B](#).
- Advice on benthic ecology is provided in [Appendix C](#).
- Advice on fish and shellfish ecology is provided in [Appendix D](#).
- Advice on marine mammals is provided in [Appendix E](#).
- Advice on offshore ornithology is provided in [Appendix F](#).

This advice incorporates advice received from JNCC with respect to potential impacts in Scottish waters to the Firth of Forth Banks Complex and Turbot Bank ncMPAs.

### **Further information and advice**

We hope this advice is of assistance to help inform the Scoping Opinion, noting that there may be aspects where some further engagement is required to assist in preparing the EIA Report.

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 & Seas

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

## **NatureScot advice on the EIA Scoping Report for the Morven Hawthorn Pit Grid Connection**

### **Appendix A – Physical processes**

Physical processes is considered within Section 7.1 and geodiversity features of ncMPAs are considered in Section E.3 of the Marine Protected Area screening assessment (Appendix E) of the EIA Scoping Report.

#### **Study area**

The proposed study area for this receptor has been defined in Section 7.1.3 as the extent of one spring tidal excursion of between circa 5km and 9km around the MHPGC scoping boundary using the Atlas of UK Marine Renewable Energy Resources (ABPmer, 2017).

However, we note from the Morven Offshore Wind Array Scoping Report that the extent of one spring tidal excursion was identified as between circa 5.5km and 13.5km from interim numerical modelling based on datasets as part of the Marine Environmental Data Information Network (MEDIN). As the MHPGC scoping boundary encompasses the Morven Offshore Wind Array, it is unclear why the maximum spring tidal excursion distance differs by up to 4.5km. Clarification on this would be welcomed.

#### **Baseline characterisation**

##### *Data sources*

It is noted in Section 7.1.4 that the baseline environment for physical processes has been characterised through a review of key datasets and reports as detailed in Table 7.2 but that this list is not exhaustive, and further datasets will be included within the EIA Report.

Paragraph 7.1.4.2 and 7.1.4.3 states that to support the acquisition of physical processes data, site specific geophysical and metocean surveys commenced in 2023 and are continuing within the MHPGC scoping boundary. This detailed site-specific data will also be used to inform the physical processes baseline and modelling for the MHPGC EIA.

It notes in Paragraph 7.1.5.12 that data from other offshore wind farm projects collected in 2012 along with data from APBmer will be used to characterise the baseline wave regime for the MHPGC proposal due to the absence of more recent data. However, metocean devices comprising two wave buoys and two LiDAR buoys were deployed within the Morven Array scoping boundary in 2022 (Paragraph 7.1.4.3). Therefore, it is unclear why this data is not being used to characterise the baseline wave regime, particularly as the MHPGC scoping boundary encompasses the Morven Array. Clarification on this would also be welcomed.

##### *Receptors*

Although designated sites relevant to physical processes are listed in Table 7.3, there is no formal identification of receptors for the assessment. We recommend that as well as the Firth of Forth Banks Complex ncMPA, consideration should be given to treating areas of undesignated seabed as a receptor. These areas do not appear to be fully characterised yet and might be judged as Low (or even Medium) sensitivity (Table 4.2), which could (Table 4.4) potentially lead to identification of environmental effects that could be mitigated.

### *Designated sites*

As noted above, Table 7.3 lists the designated sites and features within the proposed study area relevant to physical processes. This includes the Firth of Forth Banks Complex ncMPA in Scottish waters as the proposed study area for physical processes overlaps with the Montrose Bank portion of the ncMPA. It is noted in the 'relevant features for designation' column that offshore subtidal sands and gravels are listed as an Annex 1 Habitat, just to highlight that this habitat is designated as a PMF. The Firth of Forth Banks Complex Data Confidence Assessment<sup>2</sup> may be helpful in assessing potential impacts to this site.

Our advice on the MPA screening assessment (Appendix E) with respect to geodiversity features is provided below.

### **Potential impacts**

The potential impacts proposed to be scoped into the assessment are detailed in Table 7.4 and it is noted in Section 7.1.6.3 that no potential impacts are proposed to be scoped out of the assessment. We are generally content with this, subject to our comments below.

Although it is noted in Section 7.1.6.3 that no impacts are proposed to be scoped out of the assessment, 'increased SSCs and associated deposition' has been scoped out for the operation and maintenance phase. It states in Table 7.4 that increased SSCs is expected to be minimal during this phase and associated with minor repair and reburial only. However, we advise that at this stage, and without further justification or evidence provided that repairs are likely to be minor in nature, this impact should be scoped into the operation and maintenance phase for further assessment. This is in line with advice provided for transmission cables elsewhere.

There is no mention of seabed scour as a potential impact. We advise that this should be scoped in and assessed, either as a separate impact or consideration should be given to incorporating it into the assessment for 'impacts to seabed morphology'.

The potential impacts of 'impact to seabed morphology' and 'impacts to sediment transport pathways due to the presence of infrastructure' are proposed to only be assessed for the construction and / or operation and maintenance phases. However, it is noted in Section 3.9, in relation to decommissioning, that it is anticipated that all offshore cables and any offshore cable protection may be left in-situ to minimise environmental impacts associated with their removal. If it is anticipated that cable infrastructure will be left in-situ post operation and maintenance phase, then it should be made clear within the assessment that these impacts could be permanent.

Moreover, as highlighted in the cover letter, our understanding is that in Scotland, current policy is that all infrastructure associated with offshore renewable energy should be removed during decommissioning. Thus, we advise further advice should be sought from MD LOT in relation to decommissioning and assessment requirements for the EIA.

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<sup>2</sup> JNCC (2014) Data Confidence Assessments – Firth of Forth Banks Complex Nature Conservation MPA: <https://data.jncc.gov.uk/data/4d478592-6a82-4a75-97ad-de7057da9e8a/FFBC-2-DataConfidenceAssessment-v5.0.pdf>

### **Approach to assessment**

It is noted in Section 7.1.8 that numerical modelling is planned to fully assess the potential impacts of all phases of the proposal on physical processes. The modelling will be undertaken using MIKE software, with some high-level information provided on the proposed methodology.

We advise that it is possible that some aspects of modelling could be reduced (e.g. seabed transport modelling may not be necessary) through semi-quantitative assessment using a combination of empirical formulae and expert scientific judgement. However, we recommend that we are consulted on the proposed modelling methodology prior to application submission.

It is noted and welcomed in Paragraph 7.1.8.5 that the outputs of the numerical modelling will be used to support the impact assessment for other receptors. Just to highlight that it should not be the conclusions of significance (which will be based on physical processes receptors) that is carried over into other receptor assessments but the identified magnitude of each impact.

Also just to note, the Ossian Offshore Wind Farm Array is located approximately 5km from the Morven Offshore Wind Array. Therefore, potential influences from the Ossian Offshore Wind Farm infrastructure will need to be considered within the assessment of impacts to physical processes. It may be appropriate to seek further advice from MD SEDD.

### **Cumulative impact assessment**

Section 7.1.9 notes that the CEA will follow the approach outlined in Chapter 4 (EIA Methodology), which generally appears appropriate subject to our comments in the cover letter on the Morven proposal elements.

We advise that the Applicant seeks agreement with MD LOT on the list of projects and / or plans to be included in the CEA.

### **Mitigation and monitoring**

Potential designed in measures and mitigation is outlined in Section 7.1.7. We welcome the identification of embedded mitigation at an early stage. However, as noted in the cover letter, the designed in measures / mitigation includes adherence to post-consent plans / monitoring. Plans do not strictly constitute mitigation as it is the measures contained within the plans that will mitigate impacts for which no detail has yet been provided.

Just to highlight that mitigation measure MM-11 is in relation to monitoring cables to identify any damage, destruction or decay in order to protect the cable and the infrastructure of other seabed users – it is not to mitigate impacts to physical processes.

Furthermore, note that should significant effects be identified during the EIA, the embedded mitigation measure detailed in Table 7.5 may not be sufficient to mitigate impacts.

### **Transboundary impacts**

We agree that transboundary impacts in relation to physical processes can be scoped out from further consideration.

### **MPA Screening Report**

An MPA screening assessment (Appendix E) has been provided within the EIA Scoping Report.

Having reviewed the information provided, we agree that the geodiversity features – moraines representative of the Wee Bankie key geodiversity area and shelf banks and mounds, of the Firth of Forth Banks Complex ncMPA can be screened out from further assessment. This is due to the moraine feature being located outwith the ZoI of the proposal and although the shelf banks and mounds feature may overlap with the ZoI by 200m, this is based on the precautionary distance applied of 15km, which is beyond the maximum of one spring tidal excursion.

As noted above and in Paragraph E.2.2.4 of the MPA screening assessment - the ZoI of the MHPGC proposal for benthic and geodiversity features has been increased to 15km on a precautionary basis from the modelled 5km to 9km (one maximum spring tidal ellipse). Notwithstanding our previous comments on the maximum spring tidal excursion distance, it is unclear why the ZoI has been increased for the MPA assessment – if there is the potential that impacts could extend to 15km then this should also be the study area for benthic and physical process assessments - we would welcome clarification on this point.

This advice has been provided in consultation with JNCC.

## **NatureScot advice on the EIA Scoping Report for the Morven Hawthorn Pit Grid Connection**

### **Appendix B – Underwater sound**

Underwater sound is considered within Section 7.2, with the underwater sound impact modelling methodology included within Appendix B of the EIA Scoping Report.

As noted in the Introduction (Section 7.2.1), the impacts of underwater sound on receptors relevant to our advice - marine mammals and fish & shellfish, are also discussed in their respective sections (Section 7.5 and Section 7.6).

#### **Study area**

It is noted in Paragraph 7.2.3.1 that no separate study area will be identified for underwater sound, instead the underwater sound study area will be defined by the receptors potentially impacted – we support this proposed approach.

#### **Baseline characterisation**

##### *Data sources*

Section 7.2.4 states that data collected during site-specific surveys will be used to inform the environmental input for underwater sound modelling, along with publicly available data sources as per Table 7.6 – we are also content with this approach.

##### *Underwater sound sources*

It is noted in 7.2.5.4 that the primary sources of anthropogenic sound are likely to be related to shipping activity and, to a lesser extent, oil and gas activity. Just to highlight that construction of offshore wind farms are also likely to be a source of anthropogenic sound, particularly in this region off the east coast of Scotland and will need to be considered in the CEA.

#### **Potential impacts**

The potential impacts proposed to be scoped in and out of the assessment are detailed in Tables 7.7 and 7.8. We are generally content with these, subject to our comments below.

The impact ‘increased underwater sound from non-impulsive sound sources’ is proposed to be scoped in for all phases, which we agree with. It is noted within the justification column that the exact sources of non-impulsive sound has not yet been explicitly defined but are likely to include vessel activity, cable laying, burial and protection installation as well as decommissioning. Just to highlight that a wide range of cable burial techniques are included in the PDE, including dredging, mechanical trenching, rock cutting etc., which will all have different levels of non-impulsive underwater noise associated. This should be considered to ensure that the assessment is based on a realistic worst-case scenario.

It is proposed to scope out the impact ‘effects of particle motion element of underwater sound on marine mammals during all phases’, the justification provided states that there is no evidence that particle motion has any effect on marine mammals. There is no mention of particle motion from underwater sound impacts on fish and shellfish receptors and it is unclear whether this impact is being scoped in or out for this receptor, clarity on this point would be welcomed. Also just to highlight that any potential impacts on fish could lead to indirect impacts on marine mammals and ornithology receptors.



In our view, due to the likely low levels of impulsive underwater sound for this proposal (noting that geophysical surveys may use impulsive sound but this will be intermittent and short term in nature), it is unlikely that there will be significant effects of particle motion on fish & shellfish receptors. However, justification should be provided within the EIA Report if this potential impact is to be scoped out of the assessment.

### **Approach to assessment**

It is noted in Table 7.7 that numerical modelling will be conducted to assess the impact of underwater sound on marine mammals and fish & shellfish, with further details on the proposed methodology presented in Appendix B of the Scoping Report.

Underwater sound is proposed to be assessed using a combination of source and propagation models for various sound generating activities associated with the proposal including, disposal of UXO, non-impulsive sound sources such as vessels, cable laying and cable protection installation, and geophysical surveys.

We are content that Southall et al. (2019) will be used to describe the Permanent Threshold Shift (PTS) and Temporary Threshold Shift (TTS) onset criteria for both impulsive and non-impulsive sound for marine mammals, with NOAA (2019) thresholds being used to assess behavioural responses.

For fish, the underwater sound assessment proposes to use Popper et al. (2014) criteria, which we are content with but advise that impacts should be modelled for both stationary and fleeing receptors.

### **Cumulative impact assessment**

Section 7.2.9 notes that the CEA will follow the approach outlined in Chapter 4 (EIA Methodology), which generally appears appropriate subject to our comments in the cover letter on the Morven proposal elements.

We advise that the Applicant seeks agreement with MD LOT on the list of projects and / or plans to be included in the CEA.

### **Mitigation and monitoring**

Potential designed in measures and mitigation is outlined in Section 7.2.7 and it is stated in Paragraph 7.2.7.2 that as part of the design process, a number of designed in measures will reduce the potential for impacts from underwater sound (Table 7.9).

It goes on to note that as there is a commitment to implement these measures, they are considered inherent to the design of the MHPGC proposal and that the determination of magnitude and significance will assume the implementation of such measures.

There is one designed in measure listed in Table 7.9 – a low-order UXO disposal method (e.g. deflagration) will be considered the preferred method of UXO disposal where appropriate. In the justification column it states that *'the use of the low order techniques is dependent on the condition of the UXO and individual circumstances. Furthermore, that the Applicant will not know what condition a UXO is in until it is investigated through the pre-construction site investigation surveys. Therefore, whilst the use of low order techniques is a viable solution for the clearance of UXO, it is not possible to make a commitment to using them at this stage as it will not be known whether it is a feasible option'*.

As a result of being unable, at this stage, to commit to using low-order UXO disposal to reduce underwater sound then we advise that this designed in measure cannot be used to reduce predicted impacts (e.g. magnitude) within the assessment. We advise our preference for low order (deflagration) detonation as the technique to be implemented, and the assessment of high order as a worst-case scenario for assessment purposes only.

Furthermore, should significant effects be identified during the EIA, the embedded mitigation measure detailed in Table 7.9 will not be sufficient to mitigate impacts. This should be considered further.

### **Transboundary impacts**

In relation to the potential for transboundary impacts, it is noted in Section 7.2.11 that consideration will be given to transboundary impacts of underwater sound on relevant receptors in the respective sections, including marine mammals and fish & shellfish ecology. We are content with this approach.

## NatureScot advice on the EIA Scoping Report for the Morven Hawthorn Pit Grid Connection

### Appendix C – Benthic subtidal and intertidal ecology

Benthic subtidal and intertidal ecology interests are considered in Section 7.4 of the EIA Scoping Report. Benthic features of ncMPAs are also considered in Section E.3 of the Marine Protected Area screening assessment (Appendix E).

#### Study area

Two study areas have been proposed for the benthic subtidal and intertidal ecology assessment in Section 7.4.3.

The benthic ecology study area, defined as the extent of one spring tidal excursion of between 5km and 9km around the MHPGC scoping boundary matching that for the physical processes receptor and a regional benthic ecology study area, encompassing the wider North Sea as shown in Figure 7.7 of the EIA scoping report.

In relation to the benthic ecology study area our comments on physical processes study area also apply – we would welcome clarification as to why the maximum spring tidal excursion distance differs to that proposed for the Morven Offshore Wind Array, which the MHPGC scoping boundary encompasses.

#### Baseline characterisation

##### *Data sources*

Key data sources are provided in Table 7.15 and it is noted that these will provide context to the benthic ecology survey data, including environmental DNA (eDNA), collected in the site-specific surveys. Paragraph 7.4.4.2 notes that the site-specific benthic surveys were undertaken between June and November 2023 and that the results will be presented within the EIA Report.

We are content that the list of data sources along with the site-specific survey data will be sufficient to characterise the baseline environment and inform the subsequent assessment. Just to highlight that included in Table 7.15 and throughout the document there is reference to the document relating to EUSeaMap 2019 – there is a more up to date version in EUSeaMap 2023<sup>3</sup>.

##### *Designated sites*

As illustrated in Figure 7.10 and highlighted in our physical processes advice (Appendix A), the MHPGC scoping boundary lies immediately adjacent to the Montrose Bank portion of the Firth of Forth Banks Complex ncMPA. This means that the benthic ecology study area overlaps with the ncMPA.

We do note in Section 7.4.5 that Paragraphs 7.4.5.6 - 7.4.5.8 discuss the features of the Firth of Forth Banks Complex ncMPA that are relevant to benthic ecology but there is no mention of 'ocean quahog aggregations' although we note it is acknowledged further down in Paragraph 7.4.5.35. Table 7.16 also notes the relevant feature as 'ocean quahog' rather than 'ocean quahog aggregations'.

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<sup>3</sup> <https://emodnet.ec.europa.eu/en/seabed-habitats>

It would have been useful to have highlighted all the relevant designations and features at the beginning of the section.

As noted previously, the Firth of Forth Banks Complex Data Confidence Assessment<sup>4</sup> may be helpful in assessing potential impacts to this site.

Our advice on the MPA screening assessment (Appendix E) with respect to benthic features is provided below.

#### *Habitats and species of conservation importance*

In addition to designated sites, there may be a number of habitats and species of conservation importance present within the benthic study area. Although, benthic surveys have been undertaken within the MHPGC, we note that the results are not available yet. However, considerable evidence is presented in the Scoping Report (Section 7.4.5) to suggest that habitats and species of conservation importance are likely to be present. Therefore, we advise that we expect consideration to be given to Annex 1 habitats and Priority Marine Features (PMFs) in the EIA Report<sup>5</sup>.

#### **Potential impacts**

We are generally content with the potential impacts that have been scoped in and out of assessment as per Tables 7.18 and 7.19, subject to the following comments.

The potential impact ‘increased SSCs and associated deposition’ and ‘temporary habitat loss / disturbance’ is scoped out for the operation and maintenance phase as it is noted that this is expected to be minimal and associated with minor repair and reburial only. However, as with our advice on physical processes (Appendix A), we advise that at this stage and without further justification or evidence provided that repairs are likely to be minor in nature, these impacts should be scoped into the operation and maintenance phase for further assessment. This is in line with advice provided for transmission cables elsewhere.

For the potential impacts of ‘colonisation of hard structures’ and ‘changes in physical processes’ it is proposed to only assess the impact during the operation and maintenance phase. However, as previously highlighted (Appendix A), it is noted in Section 3.9 in relation to decommissioning that it is anticipated that all offshore cables and offshore cable protection may be left in-situ to minimise environmental impacts associated with their removal. If it is anticipated that cable infrastructure will be left in-situ post operation and maintenance phase then it should be made clear within the assessment that these impacts could be permanent.

Moreover, as highlighted in the cover letter and in our advice on physical processes (Appendix A), our understanding is that in Scotland, current policy is that all infrastructure associated with offshore renewable energy should be removed during decommissioning. Therefore, we advise further advice should be sought from MD LOT in relation to decommissioning and assessment requirements for the EIA.

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<sup>4</sup> JNCC (2014) Data Confidence Assessments – Firth of Forth Banks Complex Nature Conservation MPA: <https://data.jncc.gov.uk/data/4d478592-6a82-4a75-97ad-de7057da9e8a/FFBC-2-DataConfidenceAssessment-v5.0.pdf>

<sup>5</sup> <https://www.nature.scot/professional-advice/protected-areas-and-species/priority-marine-features-scotlands-seas>

It is noted that impacts to benthic invertebrates due to Electromagnetic Field (EMF) effects is proposed to be scoped in during the operation and maintenance phase, which we agree with – advice is provided below in relation to the proposed assessment approach.

### **Approach to assessment**

The proposed assessment methodology is set out in Section 7.4.9, which we are generally content with subject to the following comments.

#### *PMFs*

We advise that assessments should be undertaken for all benthic PMF habitats and species recorded within the benthic ecology study area. The assessment should quantify, where possible, the likely impacts to PMFs and assess whether this could lead to a significant impact on the national status of each PMF.

#### *EMF*

It is noted that the impacts to benthic invertebrates from EMF effects will be assessed for the operation and maintenance phase but that no specific modelling will be undertaken. It does state in Table 7.18 that the assessment will be quantitative and based on information derived from the PDE. We would usually expect modelling to inform the assessment, therefore we advise consulting us in advance of application submission on the proposed assessment methodology to ensure that the potential impacts to benthic species from EMF effects is sufficiently assessed.

We are also aware that the Offshore Wind Energy and Change Programme (OWEC) funded Floating Offshore Wind Environmental Response to Stressors (FLOWERS)<sup>6</sup> project is due to report in spring this year and this may have pertinent information to consider in respect of EMF effects.

### **Cumulative impact assessment**

Section 7.4.10 notes that the CEA will follow the approach outlined in Chapter 4 (EIA Methodology), which is largely appropriate subject to our comments in the cover letter on the Morven proposal elements.

One aspect that we advise should be considered cumulatively is EMF impacts. There has been a tendency for wind farm proposals to dismiss impacts of EMF from a cumulative perspective. We are concerned that the spatial and temporal scale is not being sufficiently considered cumulatively across the network of cables, including those outwith the proposal.

As also previously advised, the Applicant should seek agreement with MD LOT on the list of projects and / or plans to be included within the CEA.

### **Mitigation and monitoring**

Designed in measures and mitigation relevant to benthic ecology is outlined in Table 7.20. We welcome the identification of embedded mitigation at an early stage. However, as noted in the cover letter, much of the designed in measures / mitigation includes adherence to post-consent plans / programmes. Plans do not strictly constitute mitigation as it is the measures contained within the plans / programmes that will reduce / mitigate impacts for which no detail has yet been

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<sup>6</sup> <https://www.thecrownestate.co.uk/news/the-crown-estate-and-cefas-advance-understanding-of-interactions-between>

provided. Furthermore, should significant effects be identified during the EIA, the mitigation measures detailed in Table 7.20 may not be sufficient to mitigate impacts.

We note that mitigation measure MM-7 – ‘placement of cable protection will be minimised as far as possible’ has only been proposed for the operation and maintenance phase, and only included as a designed in measure for fish and shellfish. This mitigation measure may also benefit benthic receptors, particularly if it was also implemented during the construction phase.

MM-10 – ‘development and adherence to a Cable Specification and Installation Plan (CSIP)’ has been proposed for all phases and is included for a number of receptors, including benthic ecology. It isn’t clear if the CSIP will incorporate the mitigation measure of minimising the placement of cable protection as far as possible – we recommend it does.

It is stated in Table 3.7 that the minimum target depth for cable burial is 0.5 – 2.5 m. We generally advise that the minimal target burial depth should be at least 1m to help reduce potential EMF impacts and reduce risk of re-exposure and damage.

### **Transboundary impacts**

Potential transboundary impacts are discussed in Section 7.4.12 - we are content for transboundary impacts for benthic interests to be scoped out from further consideration.

### **MPA screening assessment**

An MPA screening assessment (Appendix E) has been provided within the Scoping Report. Having reviewed the information provided, we agree that as the benthic features - ocean quahog aggregations and offshore subtidal sands and gravels of the Firth of Forth Banks Complex ncMPA, are located immediately adjacent to the proposal boundary and could be impacted by the proposal e.g. increased SSCs and associated deposition, they should be screened in for further assessment.

No information has been provided as to the proposed assessment methodology. However, we advise that potential impacts to these benthic features should be assessed against the relevant Firth of Forth Banks Complex ncMPA Conservation Objectives<sup>7</sup>.

This advice has been provided in consultation with JNCC.

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<sup>7</sup> <https://data.jncc.gov.uk/data/92fb7e5e-5e68-4e66-bde3-afd9c27d6b14/FFBC-2-ConservationObjectives-v1.0.pdf>

## NatureScot advice on the EIA Scoping Report for the Morven Hawthorn Pit Grid Connection

### Appendix D – Fish and shellfish ecology

Fish and shellfish ecology is considered in Section 7.5 of the EIA Scoping Report, with fish and shellfish features of ncMPAs considered in Section E.3 of the Marine Protected Area screening assessment (Appendix E).

Our advice focuses on 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 agree that ocean quahog and horse mussel should be considered as benthic ecology receptors.

#### Study area

Two study areas have been proposed for the fish and shellfish ecology assessment in Section 7.5.3.

The fish and shellfish ecology study area has been defined as the extent of one spring tidal excursion of between 5km and 9km around the MHPGC scoping boundary and a regional fish and shellfish ecology study area encompassing the wider North Sea as shown in Figure 7.12 of the EIA scoping report.

In relation to the fish and shellfish ecology study area, our comments on the physical processes and benthic study areas also applies – we would welcome clarification as to why the maximum spring tidal excursion distance differs to that proposed for the Morven Offshore Wind Array, which the MHPGC scoping boundary encompasses.

It is noted in Paragraph 7.5.3.2 that the fish and shellfish ecology study area is designed to incorporate the ZOI from indirect impacts e.g. increases in SSCs etc. Just to highlight, underwater sound impacts to fish may extend beyond the fish and shellfish ecology study area into the regional fish and shellfish ecology study area. Therefore, we advise that underwater noise modelling should inform the ZOI for assessing this potential impact to fish and shellfish receptors.

#### Baseline characterisation

##### *Data sources*

The existing data sources proposed to be used to inform the baseline environment are presented in Table 7.22 and the site-specific survey data is described in Paragraphs 7.5.4.2-7.5.4.6.

Table 7.22 captures most of the relevant baseline datasets but we also recommend inclusion of the Feature Activity Sensitivity Tool (FEAST)<sup>8</sup>, which now includes some fish and shellfish information. We also recommend 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’. We can supply a copy of this paper on request.

It is noted that site-specific benthic survey data will also be used to inform the baseline for the fish and shellfish ecology, including Particle Size Analysis to identify herring spawning and sandeel

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<sup>8</sup> <https://feature-activity-sensitivity-tool.scot/>

habitat suitability, which we welcome. In addition, Drop Down Video (DDV) and eDNA survey results will also be used to support the baseline characterisation for this receptor.

Therefore, we are content that the combination of existing data (including additional sources suggested below) and site-specific surveys should provide adequate information to characterise the baseline environment for fish and shellfish ecology.

### *Receptors*

Section 7.5.5 provides a summary of the baseline for the fish and shellfish species typically expected in the regional study area, which includes marine fish, diadromous fish and shellfish species.

As noted above our interest in fish and shellfish species relates to those species that are PMFs as well as key prey species (such as herring, sandeels etc.), noting that many of these are also PMFs.

In relation to diadromous fish, Paragraph 7.5.5.14 states that all named diadromous fish species are considered to have the potential to be present within the vicinity of the MHPGC proposal, this includes – Atlantic salmon, sea trout, sea lamprey, river lamprey, allis shad and European smelt. We are content with these being included in the EIA assessment, noting that some of these species – river lamprey and European smelt are likely to interact with the proposal in coastal areas only. As the proposal is located entirely in offshore waters in Scotland, these could be scoped out of the portion of the proposal in Scottish waters.

We agree that freshwater pearl mussel (FWPM) should 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.

There is no mention of basking shark, also a PMF, within the EIA Scoping Report. We assume they are being scoped out from further assessment and are content with this 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, should they be present.

### *Designated sites*

European and nationally designated sites with fish and shellfish qualifying features, which overlap with the regional fish and shellfish ecology study area, are listed in Table 7.25 and shown in Figure 7.20.

The closest site in Scottish waters designated for fish species is Turbot Bank ncMPA, located 38km to the north of the MHPGC proposal, which is designated for sandeel (*Ammodytes marinus* / *A. tobianus*). Paragraph 7.5.5.30 states that the Turbot Bank ncMPA is not within the ZoI identified for the MHPGC proposal. As noted above, underwater sound impacts to fish may extend beyond the fish and shellfish study area – our advice on potential impacts to the Turbot Bank ncMPA is included in the MPA assessment section below.

Paragraph 7.5.5.30 identifies several rivers designated as Special Areas of Conservation (SACs) for diadromous fish, which may have connectivity to the proposal. Although an HRA Screening Report has not been submitted alongside the EIA Scoping Report we advise that at the present time, diadromous fish should be assessed through the EIA only and not through HRA.



## Potential impacts

We are generally content with the list of potential impacts proposed to be scoped in and out of the assessment as per Tables 7.27 and 7.28, subject to the following comments.

Similarly to our advice on physical process and benthic ecology, the potential impacts ‘temporary habitat loss and disturbance of habitats’ and ‘increased SSCs and associated sediment deposition’ are proposed to be scoped out for the operation and maintenance phase as it is noted that this is expected to be minimal and associated with minor repair and reburial only. However, we advise that at this stage and without further justification or evidence provided that repairs will be minor in nature, these impacts should be scoped into the operation and maintenance phase for further assessment. As noted previously, this is in line with advice provided for transmission cables elsewhere.

For the potential impact ‘underwater sound impacting fish and shellfish receptors’ it is proposed to scope this out from the operation and maintenance phase as it notes that ‘...*major maintenance activities (cable reburial and cable repair activities) will be non-routine and therefore it is proposed that this impact is scoped out of further assessment*’. Although, these activities may be non-routine, if there is a potential that they could occur and as a result cause an underwater noise impact to fish and shellfish then we advise this impact should be scoped in for assessment.

It is noted in Table 7.27 that the potential impact ‘colonisation of hard structures’ will only be assessed for the operation and maintenance phase. However, as previously highlighted in relation to decommissioning, it states in Section 3.9 of the Scoping Report that it is anticipated that all offshore cables and offshore cable protection may be left in-situ to minimise environmental impacts associated with their removal. If it is anticipated that cable infrastructure will be left in-situ post operation and maintenance phase then it should be made clear within the assessment that these impacts could be permanent.

Our previous advice in relation to current policy within Scotland around decommissioning offshore renewable infrastructure is also relevant here.

It is noted that impacts to fish and shellfish ecology due to EMF effects is proposed to be scoped in during the operation and maintenance phase, which we agree with – advice is provided below regarding the proposed assessment approach.

## Approach to assessment

We are generally content with the approach to assessment for fish and shellfish ecology set out in Section 7.5.8 of the Scoping Report, subject to the following comments.

### *PMFs*

We advise that in relation to all fish and shellfish PMF species, the assessment should quantify, where possible, the likely impacts and should assess whether the proposal could lead to a significant impact on the national status of the PMF.

### *EMF*

It is noted that the impacts to fish and shellfish species from EMF effects will be assessed for the operation and maintenance phase but that no specific modelling will be undertaken. It does state in Table 7.27 that the assessment will be quantitative and based on information derived from the PDE. We would usually expect modelling to inform the assessment, therefore we advise

consulting us in advance of application submission on the proposed assessment methodology to ensure that the potential impacts to fish and shellfish species from EMF effects is sufficiently assessed.

As noted previously, we are also aware that the OWEC funded FLOWERS<sup>9</sup> project is due to report in spring this year and this may have pertinent information to consider in respect of EMF effects.

#### *Changes in prey availability*

The inter-related effects assessment for fish and shellfish is discussed within Section 7.5.10 of the Scoping Report.

We advise that the EIA Report should clearly set out impacts to key prey species (such as sandeel, herring, mackerel and sprat) and their habitats arising from the proposal alone and cumulatively. The PrePARED (Predators and Prey Around Renewable Energy Developments) project<sup>10</sup> may be helpful in the understanding of predator-prey relationships in and around offshore wind farms.

#### **Cumulative impact assessment**

Section 7.5.9 notes that the CEA will follow the approach outlined in Chapter 4 (EIA Methodology), which generally appears appropriate subject to our comments in the cover letter on the Morven proposal elements.

One aspect, previously raised in our benthic advice (Appendix C), is that EMF impacts should be considered cumulatively. There has been a tendency for wind farm proposals to dismiss impacts of EMF from a cumulative perspective. We are concerned that the spatial and temporal scale is not being sufficiently considered cumulatively across the network of cables, including those outwith the proposal.

We advise that the Applicant seeks agreement with MD LOT on the list of projects and / or plans to be included in the CEA.

#### **Mitigation and monitoring**

Designed in measures relevant to fish and shellfish ecology is presented in Table 7.29 and whilst the majority of the mitigation presented isn't directly related to fish and shellfish, implementation of some of these measures could indirectly reduce the potential impacts on fish and shellfish. Highlighting that should significant impacts be identified during the EIA, the embedded mitigation measures may not be sufficient to mitigate impacts.

As noted in our advice for other receptors – the designed in measures largely includes adherence to post-consent plans / programmes that will mitigate impacts for which no detail has yet been provided. Paragraph 7.5.7.1 states that the determination of magnitude and significance of impacts in the EIA Report will assume the implementation of these measures – care needs to be taken that there is a commitment to specific measures in order for these to be truly embedded measures that will reduce impacts and thus could be used in the assessment to reduce the magnitude and significance of effects.

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<sup>9</sup> <https://www.thecrownestate.co.uk/news/the-crown-estate-and-cefas-advance-understanding-of-interactions-between>

<sup>10</sup> PrePARED Project: <https://owecprepared.org/>

Furthermore, we highlight that the justification provided for mitigation measure MM-22 is in relation to controlling specific health and safety risks – it is not to mitigate impacts to fish and shellfish.

Mitigation measure MM-10 relates to development and adherence to a cable plan and notes that this measure will reduce EMF and thermal impacts on fish and shellfish species. As previously advised for benthic ecology (Appendix C), we generally advise that the minimal target burial depth should be at least 1 m to help reduce potential EMF effects and reduce the risk of re-exposure and damage to the cable.

### **Transboundary impacts**

The potential for transboundary impacts to fish and shellfish ecology is discussed in Section 7.5.11 of the EIA Scoping Report. The Applicant proposes to screen in a number of impact pathways, including underwater sound into the EIA transboundary assessment for this receptor group. We advise that there is no potential for transboundary impacts from the proposal description and information provided within the EIA Scoping Report.

### **MPA screening assessment**

An MPA screening assessment (Appendix E) has been provided within the EIA Scoping Report.

The results of the preliminary screening are presented in Section E.3 and we agree that the sandeel feature of Turbot Bank ncMPA can be screened out from further assessment. Turbot Bank ncMPA is located 38km to the north of the MHPGC proposal and from the proposed activities associated with the proposal it is unlikely that any potential significant impacts will affect the sandeel feature of the Turbot Bank ncMPA, including underwater sound.

Our advice in relation to the ocean quahog aggregation feature of the Firth of Forth Banks Complex ncMPA has been provided in Appendix C – benthic ecology.

This advice has been provided in consultation with JNCC.

## **NatureScot advice on the EIA Scoping Report for the Morven Hawthorn Pit Grid Connection**

### **Appendix E – Marine mammals**

Marine mammal interests are considered in Section 7.6 of the EIA Scoping Report. Marine mammal species are also considered within Section E.3 of the Marine Protected Area screening assessment in Appendix E of the Scoping Report.

#### **Study area**

Two study areas have been proposed for the marine mammal assessment in Section 7.6.3.

The marine mammal study area, defined as the area encompassing the MHPGC scoping boundary plus 4km buffer – this was defined for aerial surveys of the array area for ornithology and marine mammal surveys.

The second study area is defined as the marine mammal regional study area and extends over the northern North Sea geographic region to the European coastline as shown in Figure 7.21. We are content with both study areas proposed.

#### **Baseline characterisation**

##### *Data sources*

Key data sources are provided in Table 7.32 and site-specific survey data from the Morven Array in Table 7.32 – we are content that a combination of existing data sources and site-specific surveys should provide adequate information to characterise the baseline environment but recommend consideration of the additional data sources below.

The proposed Ossian Offshore Wind Farm is located approximately 5km away, we suggest information contained within the Ossian Offshore Wind Farm EIA Report could help inform the marine mammal baseline for the MHPGC proposal.

We also note from other receptor sections of the EIA Scoping Report that eDNA has been collected from sediment and water to determine species composition. If DNA metabarcoding has included marine mammals, it would be useful to present the results of this in the EIA Report to add additional context.

##### *Reference population*

In relation to the reference populations, we advise use of the population estimates for the UK portion of the Inter-Agency marine Mammal Working Group (IAMMWG) MUs rather than the full MUs for species with very large MUs. This is to present the most realistic assessment of numbers of animals affected by the proposal in Scottish waters. The MUs for most species are very large and in most cases are too big for a meaningful understanding of impacts to potentially impacted populations. Although we acknowledge this is based on a non-biological delineation, we feel that using the UK portion of the MU better reflects the likely size of populations affected by the potential impact pathways.

The use of population estimates for the full MUs are still useful for context and baseline characterisation. Therefore, we advise stating the total MU population for context and then assessing impacts against the UK portion of the MU.

### *Receptors*

The list of marine mammal species proposed to be scoped into the assessment is provided in Section 7.6.5.60 and we are generally content with those listed. However, as noted in Paragraph 7.6.5.53, harbour seal are known to occur in the marine mammal study area, albeit in low numbers, and they are a vulnerable species experiencing large population decline on the east coast. In addition, we note that common dolphin was recorded in the Morven Array DAS along with a number of unidentified dolphins and dolphin / porpoises. Therefore, we advise that it is too early to scope out harbour seal or common dolphin from further assessment and suggest further discussion prior to application submission.

### *Designated sites*

Paragraph 7.6.5.5 states that the Southern Trench ncMPA, designated for minke whale, lies 48km from the MHPGC scoping boundary and as minke whale is only protected within the boundaries of the MPA there is not anticipated to be any requirement for inclusion of this site within an MPA assessment as there is not expected to be a pathway from the impacts to the MPA. We advise that underwater sound impacts, particularly from UXO clearance, could extend some distance beyond the MHPGC scoping boundary – our advice in relation to the Southern Trench ncMPA is provided below.

### **Potential impacts**

We are generally content with the potential impacts that have been scoped in and out of the assessment as per Tables 7.34 and 7.35, subject to our comments below.

Injury and disturbance from underwater sound generation in relation to UXO clearance is scoped in for the construction phase, which we agree with. We note from Table 7.34 that it is intended for the assessment to incorporate recommendations outlined in the joint interim position statement on UXO clearance (UK Government et al., 2022). Just to highlight that the policy in relation to UXO clearance was updated in January 2025<sup>11</sup> - low noise methods should be the default used to clear any type of UXO in the marine environment. If there are extraordinary circumstances which means that low noise clearance cannot be undertaken, Applicants should engage with MD LOT at the earliest opportunity. We advise our preference is for low order (deflagration) detonation as the technique to be implemented, and the assessment of high order as a worst-case scenario for assessment purposes only.

It is noted that the potential impact ‘disturbance to marine mammals from pre-construction site investigation surveys’ is in relation to geophysical surveys in the pre-construction phase only. If geophysical surveys are likely to be required during the operation and maintenance phase and / or decommissioning phase i.e. for cable repair or cable assessment activities, then this impact should be scoped in for assessment across all phases of the proposal. Alternatively, if geophysical surveys form part of the ‘disturbance to marine mammals from vessel use and other sound-producing activities’ then this should be made explicitly clear.

Whilst we acknowledge that EPS licences will be sought for these activities separately (as with UXO clearance) they should also be considered within the EIA.

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<sup>11</sup> <https://www.gov.uk/government/publications/marine-environment-unexploded-ordnance-clearance-joint-position-statement/marine-environment-unexploded-ordnance-clearance-joint-position-statement>

## Approach to assessment

The proposed marine mammal assessment methodology is outlined in Section 7.6.8

Paragraph 7.6.8.4 states that the marine mammal species carried forward to the assessment will be grouped into broad ecological groups called Important Ecological Features (IEFs) – these IEFs will be those features against which impacts associated with the proposal will be assessed. The rationale behind this is not explained and we do not support this proposed approach for the assessment of impacts to marine mammals. We expect marine mammals to be assessed independently rather than grouped together for assessment. For species where quantitative assessment is possible, we expect to see a percentage of each species respective (UK portion) reference population when assigning the magnitude of each assessed impact.

Therefore, we advise the Applicant to consult us further on the proposed assessment approach for this receptor prior to application submission. Further comments and advice regarding the approach to assessment are provided below.

### *Density estimates*

We advise that density estimates could be generated from site-specific DAS (for those species with sufficient data), particularly as this comprises a considerable part of the MHPGC proposal scoping boundary within Scottish waters, and then the most precautionary estimate between SCANS IV and DAS is used for the assessment. If there are no density estimates available from DAS or SCANS IV, or the SCANS III modelled density surfaces are significantly higher, then SCANS III should be used instead. If this is not available, we can accept Waggitt et al. (2019). If no density estimates are available, then we would advise assessing the species qualitatively. For seals we would advise a quantitative assessment using Carter *et al.* (2020) density estimates.

### *UXO clearance*

In relation to auditory injury impacts from underwater noise (UXO clearance), we expect to see a sensitivity score of High for all cetacean species. This is due to the known importance of hearing function to these species, the uncertainty of this impact in the long term as well as the high vulnerability and low recoverability of individuals from the impact. In relation to disturbance from UXO clearance we would expect a score of Low or Negligible due to the short duration of impact particularly if using low order deflagration techniques.

### *EPS Licence requirements*

For marine mammals, we expect the assessment to focus on impacts to cetaceans under EIA legislation. However, there is also a need to consider impacts to cetaceans within an EPS context, as far as reasonably practicable.

We do not expect a full EPS Risk Assessment at this stage but an understanding of the implications for cetaceans from the proposal under offshore regulations<sup>12</sup>, together with mitigation options. This will provide confidence, should the proposal be consented, that any impact is able to be addressed through a subsequent derogation under EPS licensing. In our experience, leaving this entirely to the post-consent stage has led to difficulties and delays.

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<sup>12</sup> The Conservation of Offshore Marine Habitats and Species Regulations 2017

### **Cumulative impact assessment**

Section 7.6.9 notes that the CEA will follow the approach outlined in Chapter 4 (EIA Methodology), which generally appears appropriate subject to our comments in the cover letter on the Morven proposal elements.

We recommend including all projects up to a year on either side of the proposal, looking at both temporal and spatial overlap. Where underwater noise outputs are not available for other projects, we can accept the use of effective deterrent ranges.

### **Mitigation and monitoring**

Designed in measures and mitigation relevant to marine mammals is outlined in Table 7.36. We welcome the identification of embedded mitigation at an early stage. However, as noted in the cover letter and previous appendices, much of the designed in measures / mitigation includes adherence to post-consent plans. Plans do not strictly constitute mitigation as it is the measures contained within the plans that will mitigate impacts for which no detail has been provided yet. Paragraph 7.6.7.2 states that the determination of magnitude and significance will assume the implementation of such measures – care needs to be taken that there is a commitment to specific measures in order for these to be truly embedded measures that will reduce impacts and thus could be used in the assessment to reduce the magnitude and significance of effects.

Furthermore, should significant effects be identified during the EIA, the embedded measures may be insufficient to mitigate impacts.

### **Transboundary impacts**

The potential for transboundary impacts to marine mammals is discussed in Section 7.6.11 of the EIA Scoping Report. The Applicant proposes to screen in a number of impact pathways, including underwater sound into the EIA transboundary assessment for this receptor group. We advise that there is no potential for transboundary impacts from the proposal description and information provided within the EIA Scoping Report.

### **MPA screening assessment**

An MPA screening assessment (Appendix E) has been provided within the EIA Scoping Report.

The Southern Trench ncMPA is located 48km from the MHPGC scoping boundary and is designated for minke whale. As noted in Paragraph E.3.1.17, based on experience from other offshore wind farms in Scotland, the ncMPA is located outside the area within which injury to minke whales could occur from the proposal.

In terms of potential for disturbance to minke whales from underwater sound, it is unlikely that there would be significant impacts from the MHPGC proposal during the cable lay and if low-order deflagration (as preferred) is undertaken for any UXO clearance then we advise potential impacts could be scoped out from further assessment.

## NatureScot advice on the EIA Scoping Report for the Morven Hawthorn Pit Grid Connection

### Appendix F – Offshore ornithology

Offshore and intertidal ornithology interests are considered in Section 7.7 of the EIA Scoping Report. Ornithological species are also considered within Section E.3 of the Marine Protected Area screening assessment (Appendix E).

Although this section relates to offshore and intertidal ornithology, as the Scottish portion of the export cable is located entirely within offshore waters, our advice below relates to the offshore ornithology interest only.

#### Study area

The proposed study area for ornithology (Section 7.7.3) consists of a 4km buffer around the MHPGC scoping boundary, which we are content with.

It is noted in Paragraph 7.7.3.5 that the MHPGC proposal will include minimal infrastructure that has the potential to impact offshore ornithology receptors, which we would agree with for the operation and maintenance phase. However, we would highlight that there is the potential for impacts to ornithology receptors in the construction and decommissioning phase.

Paragraph 7.7.3.6 acknowledges that as seabirds and other migratory birds are highly mobile species, there is the potential for birds occurring within the proposal study area to have originated from more distant locations (e.g. breeding colony). Therefore, it is proposed, for each species, to identify a regional study area based on a number of factors including published foraging ranges from Woodward et al. 2019. We are content with this approach.

#### Baseline characterisation

##### *Data sources*

Examples of data sources that will be used to inform the ornithology assessment are discussed in Section 7.7.4. We are content with these but would recommend the following additional data sources are also considered:

- SiteLink – provides access to data and information on key protected areas around Scotland: <https://sitelink.nature.scot/home>
- NatureScot guidance notes to support offshore wind applications - marine ornithology: <https://www.nature.scot/doc/guidance-note-1-guidance-support-offshore-wind-applications-marine-ornithology-overview>
- Ossian Offshore Wind Farm EIA Report: <https://marine.gov.scot/node/25347>

##### *Designated sites*

Paragraph 7.7.5.3 acknowledges that species which occur within the offshore and intertidal ornithology study area may be qualifying features of designated sites. It goes on to state that to inform the scoping report, a generic 50km buffer has been used to identify designated sites with offshore ornithological features (e.g. Special Protection Areas (SPAs)) within close proximity to the MHPGC proposal. We advise that this approach is insufficient and may omit species and sites that could be impacted by the proposal. For SPA connectivity we advise following our Guidance note 3



– identifying theoretical connectivity with breeding site SPAs using breeding season foraging ranges<sup>13</sup>.

Table 7.42 includes mention of the Outer Firth of Forth and St Andrews Bay Complex (OFFSAB) marine SPA – just to highlight that a number of the OFFSAB qualifying seabird species are functionally linked to breeding colony SPAs along the east coast of Scotland – further information can be found in the Sites’ Conservation and Management Advice note<sup>14</sup> via SiteLink, which may be helpful when undertaking the assessment.

### **Potential impacts**

We are generally content with the potential impacts that have been scoped in and out of the assessment as per Tables 7.44 and 7.45, subject to the following comments.

The potential impact ‘indirect impacts from underwater sound affecting prey species’ is proposed to be scoped out for the operation and maintenance phase, with no justification provided.

Underwater sound impacting fish and shellfish was proposed to be scoped out as per Table 7.27 of the EIA Scoping Report as it states that major maintenance activities will be non-routine. However, no detail is provided on what major maintenance, or any maintenance activities, might comprise. Therefore, as per our advice for fish and shellfish (Appendix D), this impact should remain scoped in for ornithology for the operation and maintenance phase until some justification is provided – we advise this could be agreed during discussions prior to application submission.

‘Temporary habitat loss / disturbance from increased SSCs, including indirect impacts on prey species’ has also similarly been scoped out for the operation and maintenance phase, with no justification provided.

This potential impact has also been proposed to be scoped out for a number of receptors including benthic ecology, physical processes and fish & shellfish interests. However, as advised for those receptors, without justification or evidence that repairs are likely to be minor in nature, this impact should be scoped into the operation and maintenance phase for further assessment. Particularly as it acknowledges in Table 7.44 that increased SSCs has the potential to affect the foraging efficiency of diving birds as well as indirect impacts on fish and shellfish prey. We advise that this could be discussed further prior to application submission.

### **Approach to assessment**

The proposed ornithology assessment methodology is outlined in Section 7.7.8

Paragraph 7.7.8.3 states that the assessment of likely ecological impacts of the MHPGC proposal will focus on ‘valued ornithological receptors’ (VORs) and that VORs are species populations and assemblages of high ecological value present within the ZoI and in numbers that could mean any impacts associated with the proposal are considered significant. These VORs will then be subject to a semi-quantitative, evidence-based assessment to consider impacts and identify any required mitigation.

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<sup>13</sup> <https://www.nature.scot/doc/guidance-note-3-guidance-support-offshore-wind-applications-marine-birds-identifying-theoretical>

<sup>14</sup> <https://www.nature.scot/sites/default/files/special-protection-area/10478/conservation-and-management-advice.pdf>

We are generally content with this approach, subject to our previous advice around the Zol, but advise the Applicant consult us further on the list of VORs and detailed assessment approach prior to application submission. Additional advice in relation to taking account of Highly Pathogenic Avian Influenza (HPAI) within the assessment is provided below.

#### *HPAI*

We advise that there is a need to incorporate HPAI impacts within the assessment. Work is continuing within NatureScot to provide further information and guidance, which will be available in due course. In the meantime, we expect the impact of HPAI on colonies to be considered qualitatively. Surveys have been undertaken at a number of key seabird colonies in 2023, coordinated by RSPB, some of which were repeated in 2024. Recent data for key species at some sites can be found on the SMP database. In addition, the RSPB have published a report (Tremlett *et al.* 2024)<sup>15</sup> on HPAI effects, which will provide useful context.

#### **Cumulative impact assessment**

Section 7.7.9 notes that the CEA will follow the approach outlined in Chapter 4 (EIA Methodology), which generally appears appropriate subject to our comments in the cover letter on the Morven proposal elements.

#### **Mitigation and monitoring**

Designed in measures and mitigation relevant to ornithology is outlined in Table 7.46. We welcome the identification of embedded mitigation at an early stage. However, as noted in the cover letter and previous appendices, much of the designed in measures / mitigation includes adherence to post-consent plans. Plans do not strictly constitute mitigation as it is the measures contained within the plans that will mitigate impacts for which no detail has been provided yet. Paragraph 7.7.7.1 states that the determination of magnitude and significance will assume the implementation of such measures – care needs to be taken that there is a commitment to specific measures in order for these to be truly embedded measures that will reduce impacts and thus could be used in the assessment to reduce the magnitude and significance of effects.

We welcome designed in measure MM-79, which commits to developing a Vessel Management Plan (VMP). However, we note that this appears to cover the construction phase only. We would advise the VMP contains measures to minimise disturbance of bird species across all phases of the proposal and should consider most likely ports and harbours to be used by vessels transiting to and from the MHPGC proposal.

#### **Transboundary impacts**

We advise that there is no potential for transboundary impacts from the proposal description and information provided within the EIA Scoping Report.

Please see our scoping advice in respect of the Morven Offshore Wind Array (24 August 2024) – where we advise consideration will be required for cross border impacts for the array alone.

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<sup>15</sup> Tremlett, C.J., Morley, N., and Wilson, L.J. (2024). UK seabird colony counts in 2023 following the 2021- 22 outbreak of Highly Pathogenic Avian Influenza. RSPB Research Report 76. RSPB Centre for Conservation Science, RSPB, The Lodge, Sandy, Bedfordshire, SG19 2DL. <https://www.rspb.org.uk/birds-and-wildlife/seabird-surveys-project-report>

**MPA screening assessment**

An MPA screening assessment (Appendix E) has been provided within the Scoping Report. We have reviewed the information provided in Section E.3 and agree that there is no connectivity to any ornithology features of ncMPAs.

# North Sea Transition Authority


**From:** [Stuart Walters \(North Sea Transition Authority\)](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Benjamin Taylor](#)  
**Subject:** SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025  
**Date:** 24 January 2025 14:39:14  
**Attachments:** [image001.png](#)

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Good Afternoon,

Just to confirm a nil return from the NSTA on the Hawthorn Pit Grid connection EIA Scoping Opinion report.

Many Thanks,

 <p><b>North Sea Transition Authority</b></p>	<p>Stuart Walters Senior Policy Manager – Energy Transition Strategy Directorate</p> <p>✉ NSTA, Lower Ground Floor, Sanctuary Buildings, 20 Great Smith Street, London, SW1P 3BT</p> <p>💻 <a href="mailto:stuart.walters@nstauthority.co.uk">stuart.walters@nstauthority.co.uk</a></p> <p>☎ [Redacted]</p> <p><a href="http://www.nstauthority.co.uk">www.nstauthority.co.uk</a> Follow us on Twitter <a href="https://twitter.com/NSTAuthority">@NSTAuthority</a></p>
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# Northern Lighthouse Board



# Northern Lighthouse Board

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Your Ref: SCOP-0058 – Morven OWF – Scoping Report  
Our Ref: AL/OPS/ML/WIND\_077\_24

Ms Lauren Cowan  
Licensing Operations Team – Marine Directorate  
Scottish Government  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

23 December 2024

## **THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007**

### **SCOP-0058 – Morven Offshore Wind Ltd – Hawthorn Pit Grid Connection,**

Thank you for your e-mail correspondence dated 20<sup>th</sup> December 2024 relating to the Scoping Report submitted by **Morven Offshore Wind Ltd** for the proposed additional grid connection for the Morven Offshore Windfarm at Hawthorn Pit, Durham. It is noted that whilst the exact export cable landfall site has not been confirmed, it will be in the proximity of Seaham, Durham.

Northern Lighthouse Board note that Shipping and Navigation will be included within the EIA Report for the Hawthorn Pit Grid Connection, and have no objection to the Scoping Report in respect to the section of the export cable route within Scottish waters.

However, it should be noted that Trinity House, as the General Lighthouse Authority for England, Wales, the Channel Islands and Gibraltar, should be consulted for the portion of the export cable route and landfall located within English waters.

Yours sincerely

[Redacted]

Peter Douglas  
Navigation Manager

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# Northumberland County Council



**From:** [Gordon Halliday](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Kevin Tipple](#); [Vivienne Cartmell](#)  
**Subject:** Morven Hawthorn Pit Grid Connection Project  
**Date:** 06 January 2025 15:07:33

---

*Dear Sirs*

*Thank you for consulting Northumberland County Council on the request for a Scoping Opinion submitted by Morven Offshore Wind Limited for the development of the Morven Hawthorn Pit Grid Connection Project. It is noted that the offshore part of the project is located in the North Sea in both Scottish and English waters whilst the onshore element is located within the local authority areas of Durham County Council and Sunderland City Council.*

*It is noted furthermore that no part of the Scoping Boundary is located within Northumberland. The Scoping Boundary is approximately 20 kilometres offshore from the Northumberland coast at its closest point.*

*Northumberland County Council has declared a Climate Emergency vowing to half its carbon footprint by 2025 and make the county carbon neutral by 2030. The Council considers that the further development of offshore wind is consistent with its wider aims. The Council is therefore generally supportive of the Morven Hawthorn Pit Grid Connection Project.*

*I would be grateful if you would keep the Council informed of this project as it develops.*

*Gordon Halliday  
Case Officer*

Gordon Halliday MA MPhil MRTPI  
Planning Consultant  
Planning Services  
Place and Regeneration  
Northumberland County Council  
County Hall  
Morpeth  
Northumberland  
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Northumberland County Council Stay Home



# RYA Scotland



**10 January 2025**

Lauren Cowan  
Marine Licensing and Consenting Casework Manager  
Licensing Operations Team  
Marine Directorate  
Marine Laboratory,  
375 Victoria Road,  
Aberdeen,  
AB11 9DB  
MD.MarineRenewables@gov.scot benjamin.taylor@gov.scot

Dear Lauren,

**SCOP-0058 – Morven Offshore Wind Limited – Hawthorn Pit Grid Connection**

I have read the relevant parts of the scoping report on behalf of RYA Scotland. Rather few recreational vessels are likely to pass over the line of the export cable in Scottish waters, although there will be some. The only impact on recreational vessels could be during the cable laying phase. However, cable laying is covered in the Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREGs), with which all recreational boaters are expected to be familiar. I see no need for any additional data collection beyond that required by the MCA. I note that there may be a future application for an additional connection to Branxton near Torness.

Yours sincerely,

[Redacted]

Dr G. Russell FCIEEM(retd) FRMetS

Planning and Environment Officer, RYA Scotland

# Scottish Environment Protection Agency

**From:** [Planning.North](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Benjamin Taylor](#)  
**Subject:** PCS-20004117 SEPA Response to SCOP-0058  
**Date:** 20 December 2024 13:06:54  
**Attachments:** [image.png](#)

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To Whom It May Concern,

## **Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017**

### **SCOP-0058**

#### **Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion**

**This consultation request relates to the offshore elements of the proposed works in Scottish waters only and not the onshore elements of the proposed works or the offshore elements of the proposed works in English waters.**

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,  
Jessica Taylor  
Senior Planning Officer



**For the future of our environment**

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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu [postmaster@sepa.org.uk](mailto:postmaster@sepa.org.uk). Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhraid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1 4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghlèidheadh agus airson adhbharan laghail eile.

Scottish  
Fishermen's  
Federation





Our Ref: FH- Morven OEC/0025/001

Your Ref: SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection

E-mail: [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

14 February 2025

Dear Lauren Cowan /MD-LOT

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)

## **SFF Response to Morven OWF Hawthorn Pit Grid Connection Export Cable Scoping Report (SR) 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.

### **1. General comments**

SFF note section '3.4 Offshore Infrastructure' that the total length of offshore export cable (OEC) is 341 km with 80km in Scottish waters and 261km in English waters. There will be maximum of 6 cables. We also note that the Applicant is using Project Design Envelopment (PDE) for this consultation, therefore SFF response will be focused on the current content of the documents provided with this consultation and is applicable to the whole project (both OEC in Scottish and English waters).

### **Boulder and UXO Clearance**

The SFF notes from para '3.4.3.18 'Seabed Preparation; that boulders and UXOs will be relocated and/or cleared during the seabed preparation work.

Since the relocation of boulders and UXOs from their natural positions and re-positioning them creates snagging and safety hazards for demersal and static gears therefore SFF would suggest that to avoid the relocation of boulders and UXOs as much as possible. Where boulder and UXO relocation is unavoidable, we recommend the new locations/coordinates of the relocated boulders and UXO should be recorded and shared with fishermen. Fishermen require geographical readings to decimal of a minute format (3 decimal places sufficient) rather than going down to actual seconds and the datum should be WGS84 rather than ED50.

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

In terms of UXO clearance, the fishing industry supports the use of deflagration as opposed to UXO detonation to mitigate as much as possible against any marine life being caught in the immediate blast radius including the resulting shock waves which can result in barotrauma to marine life out with the initial blast radius.

### **Offshore Export Cable Burial**

SFF notes from para 3.4.3.16 that the OEC will be buried or protected with cable protection where burial is not practicable. Cable protection material types include: "Concrete Mattresses, Rock Placement, Rock Bags, Grout bags, Cement bags, Sandbags, Articulated pipes, Cast Iron Shells, Bend Restrictors/Stiffeners, Cable Protection Systems, Frond Mats".

Being concerned for fishermen's safety, first of all, SFF would suggest to the Applicant to make all efforts to reach the required depth of cable burial and avoid using cable protection measures as much as possible since the volume of cable protection mass will disrupt the marine habitat and has the potential to create a snagging hazard for fishing vessels within the EC.

In terms of using cable protection measures, SFF is opposed to using concrete mattresses, frond mats, rock bags, grout bags, cement bag and other similar nature protection materials in open water since they create severe snagging hazards for bottom trawl fishing vessels and static gears. SFF's preferred cable protection measure is rock protection considering industry standard rock size (1"-5") with a 1:3 profile followed by an over trawl sweep alongside a long-term monitoring programme.

In terms of crossing points, as they introduce obstacles and snagging hazards for the fishing industry, SFF would suggest that the cable crossing should be avoided as much as possible otherwise the design of cables and pipelines crossing points should be consulted on with the fishing industry to ensure their impacts are mitigated.

### **Guard vessel**

Where OEC is pre-layed on the seabed, the SFF propose the Applicant to use guard vessels on the cable route during the installation period until the cable is buried and protected as required. We propose utilising local fishing vessels to be used as guard vessels. Which in turn establishes a good working relationship and awareness of ongoing developments as they are ultimately the ones that will have their day-to-day operations disrupted.

### **Decommissioning**

SFF note from para 3.9.1.2 (p29) that during decommissioning, it is anticipated offshore cables, and any offshore cable protection may be left in-situ, to minimise environmental impacts associated with their removal. The possibility of removing the subsea cables and leaving structures above the seabed in-situ with appropriate navigation markers will also be assessed.

SFF would like to see a clear seabed post-decommissioning where no legacy snagging hazard for fishing vessels is left on seabed. Any part of the unburied cables including crossing points with any type of cable protections (except rock) should be removed to shore followed by an over-trawl sweep additionally a long-term monitoring programme to ensure safety of the fishing vessels in those areas.

### **As built report**

Due to the importance of the 'as-built report' to fishers, we would like the 'as-built report' within the first three months of cable installation as a maximum. This will allow fishing operations to resume ~~to~~ within the area as soon as possible.

## **2. Specific comments**

### **Ch. 7.4 Benthic Ecology**

SFF would like to see the 'Impacts to benthic invertebrates due to thermal emissions from subsea electrical cables' to also be scoped in since any temperature change in the invertebrate's habitat would have adverse effects on their behaviour and increase their mortality rate.

### **Ch. 7.5 Fish and Shellfish Ecology**

#### **Cable footprint and Seabed Spawning Grounds Disturbance**

SFF note section '3.4 Offshore Infrastructure' that the total length of offshore export cable (OEC) is 341 km with OEC of 1.5km wide and there will be maximum of 6 cables. However, the maximum width of seabed disturbed by cable installation (per cable) has not been specified (usually it will be around 25-30m per cable). This results to a vast area of seabed to be disturbed which will have environmental impacts especially destruction of spawning ground. SFF wonder how this impact is considered/calculated and addressed as the overall impact of the Development on seabed.

SFF note that the OEC Scoping Boundary overlaps with the spawning and nursery grounds of some commercially important demersal and pelagic fish species (including, cod, haddock, whiting, herring and sandeel). Therefore, we propose any survey activities and other seabed disturbances should be undertaken out with spawning and nursery periods of all fish species to avoid juvenile fish mortality.

We also note that the Local Benthic Ecology Study Area seabed is suitable for herring spawning. As the mentioned areas are suitable for herring spawning, the SFF are concerned about the Development impacts on all commercial value fish species in the area, especially the Development impacts on the herring which are also particularly sensitive to noise impacts as they have swim bladders which are involved in hearing.

We are of the view that any activities with negative impacts on herring spawning habitat are prohibited based on the 'ICES Advice on fishing opportunities, catch, and effort Greater North Sea ecoregion' published 31 May 2024. Therefore, SFF propose the above-mentioned ICES advice to be taken into account and acted upon at determination stage. The link for the ICES advice can be accessed here: [North Sea herring advice](#).

### **Ch. 7.8 Commercial Fisheries**

SFF have the following comments on the Commercial Fisheries chapter:

#### **Data Set/source**

SFF propose to use pre-Brexit landing data in the EIA. We reiterate the importance of pre-Brexit data to be utilised for the EIA Report to present a realistic baseline of fishing activities within the study area, as some fisheries targeting species such as small haddock have declined post Brexit.

Fishing plotter data from fishermen, SFF and associations should be used as AIS and VMS data cannot represent all the actual fishing activities within the study area. In general collection of fishing plotter data from the fisheries organisations, and any specific data from smaller vessels that are not required to use AIS or VMS is recommended.

**Proposed embedded mitigation:**

- SFF would propose 'the Fisheries Management and Mitigation Strategy (FMMS)' to be developed and adopted pre-consent in consultation with fishing industry to ensure all fishing industry's concerns are considered and addressed accordingly.
- We request that all NtMs are issued in sufficient time to avoid any disruption to fishing activities in the intended area. Fishermen require geographical readings to a decimal of a minute format (3 decimal places sufficient) rather than going down to actual seconds and the datum should be WGS84 rather than ED50.
- We propose also adding the 'dropped object' to the Kingfisher Bulletin App if a potential hazard exists for fishers.

We would propose the following Embedded Mitigations to be considered:

- As part of the proposed commitments, there is no measure for disruption payments for fishing vessels. No reference has been made about mitigation once operational and loss of fishing opportunities to the fishing industry. SFF proposes that a cooperation agreement should be considered for both static and mobile gears where they are required to be temporarily relocated. A long-term compensation mechanism should be put in place for those fishermen who are excluded from OEC.
- Utilise the services of an O.F.L.O with sufficient knowledge of fisheries and the fishers that utilise the development area.

**Scoping**

SFF notes from the Table 7.50 (p317) that 'Snagging risk – loss or damage to fishing gear' has been scoped in. We agree with this being scoped in; however, since snagging in some limited cases has resulted in fatalities, we propose that the possibility of a loss of life should also be highlighted as to a risk of snagging hazards not just to fishing gear.

In conclusion, SFF stresses that our primary concern is protecting the rights of fishermen to safely undertake their trade, and this is the cornerstone of our response. Our position is that fishing activities should continue unaffected and unharmed post-development. If impacted fishermen are denied the right to earn their living, SFF will not support the proposal of any windfarm developments.

Best regards

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

# Sport Scotland

**From:** [Kerry Gibson](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** RE: SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025  
**Date:** 31 January 2025 11:32:04  
**Attachments:** [image001.png](#)

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Good afternoon,

**sportscotland** have consulted with RYAS and have no comment to make.

Thanks,  
Kerry

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**Kerry Gibson** | Planner | **sportscotland**  
Doges | Templeton on the Green | 62 Templeton Street | Glasgow | G40 1DA

| m: [Redacted]

w: [www.sportscotland.org.uk](http://www.sportscotland.org.uk)

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# SSEN Transmission

Lauren Cowen  
Marine Directorate – Licencing and Operations  
Team  
By email: MD.MarineRenewables@gov.scot

**SSEN Transmission**  
10 Henderson Road  
Inverness  
IV1 1SN

30 January 2025

**REF: SCOP-0058 – Morven Offshore Wind Limited – Hawthorn Pit Grid Connection – Consultation on Request for Scoping Opinion**

**Dear Lauren**

Thank you for the opportunity to make a response to the Hawthorn Pit Grid Connection consultation request for scoping opinion (SCOP-0058) submitted by Morven Offshore Wind Limited submitted in December 2024.

We thank Morven OWL for their engagement this far in relation to our Eastern Green Link 2 project and note the inclusion of the intersecting area of the EGL2 project for which a Marine Licence was granted under licence number 00009943 in May 2023. We also note the inclusion of the Eastern Green Link 3 projects prospective route which will undergo submission for marine licence in the near future.

We advise that the EGL2 installation corridor and EGL3 prospective route will be subject to continued geophysical and unexploded ordnance surveys. It is likely that simultaneous marine construction and survey operations between the projects will occur and we request that Morven OWL work with SSEN Transmission project teams ahead of marine works to mutually agree simultaneous operation arrangements, ensuring safe navigation. We also request that Morven OWL proactively engage with the EGL2 and 3 projects to mutually agree suitable crossing points and methodologies should this be required. As a collaboration agreement is in place between EGL2 and Morven OWL, we request that regular meetings are held to discuss such cooperation between the developers.

More information about the EGL2 project can be found at <https://www.ssen-transmission.co.uk/projects/project-map/eastern-green-link-2/> and further details of the EGL3 project can be found at <https://www.ssen-transmission.co.uk/projects/project-map/eastern-green-link-3/>.

We are also aware that the Morven OWL team have had discussions with SSEN Transmission regarding the Offshore Grids project. This project is still in early stages, but we would request continued engagement for this project in future along with EGL2 and EGL3.

SSEN Transmission request that present and future cables, both power and telecoms, are given due consideration and that provision is maintained for cables to cross both export cables and the generation site, and that the freedom of the seas is maintained.

SSEN Transmission remains committed to working with other legitimate users of the sea in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such, we



request that ongoing discussion and consultation between both parties is maintained, and where necessary that proximity and crossing agreements are developed.

Yours sincerely,

[Redacted]

**Euan Mackenzie**

Senior Marine Consents and Environment Manager

# Transport Scotland

Lauren Cowan  
Marine Directorate  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

Your ref:  
SCOP-0058

Our ref:  
GB01T19K05

Date:  
31/01/2025

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

Dear Sirs,

**THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007  
CONSULTATION UNDER SCHEDULE 4, REGULATION 6 OF THE MW 2007 REGULATIONS.  
SCOP-0058 – Morven Offshore Wind Limited – Hawthorn Pit Grid Connection**

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by RPS in support of the above development.

This information has been passed to SYSTRA Limited 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 Morven Hawthorn Pit Grid Connection Project comprises an offshore cable corridor with a maximum length of up to 341km, up to 80km of which will be in Scottish waters. In addition, there will be an onshore high voltage direct current (HDVC) section from transition joint bays (TJBs) to land sub-station (LSS) of up to 16.8km. The Grid Connection project will support the Morven Offshore Wind Farm which lies in the North Sea, in both Scottish and English waters, from Stonehaven in the north to Sunderland in the south.

**Assessment of Environmental Impacts**

We note that the applicant will seek to consent the Project's generation and grid connection aspects separately, with planning permission for the onshore transmission assets, land substation and associated activities sought separately under the Town and Country Planning Act 1990. The SR states that the onshore element of the boundary is located within the local authority areas of Durham County Council and Sunderland City Council, at Hawthorn Pit.

Given the above, Transport Scotland is satisfied that the proposed offshore cable will not have any adverse impact on the Scottish trunk road network and no further information is required in this regard.

I trust that the above is satisfactory but should you wish to discuss in greater detail, please do not hesitate to contact me.

Yours faithfully

**[Redacted]**

**George Smith**

**Transport Scotland  
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

# UK Hydrographic Office

**From:** [Offshore Energy](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [SDR](#); [Benjamin Taylor](#); [Duncan Metcalfe](#)  
**Subject:** RE: SCOP-0058 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - Consultation on Request for Scoping Opinion – Response Required by 31 January 2025  
**Date:** 14 January 2025 10:17:41  
**Attachments:** [image001.png](#)

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Good morning,

Thank you for sending this to the UKHO. While we expect that construction work on any approved wind farm would not start for some time, we would like the operators to be aware of our requirements at that time:

1. Detailed plans for turbine locations and cable routes should be sent to the UKHO as soon as available prior to commencement of construction. Please send correspondence to [SDR@ukho.gov.uk](mailto:SDR@ukho.gov.uk).
2. The UKHO requires FIVE WEEKS advance notice of offshore activities, together with details of activities taking place, eg buoyage, foundation construction, cable laying, to allow preparation of Admiralty Notices to Mariners. Please send notifications and correspondence to [SDR@ukho.gov.uk](mailto:SDR@ukho.gov.uk).
3. The operator should also be advised to contact our Radio Navigation Warnings section 24 hours before offshore work is due to commence, Email: [NavWarnings@UKHO.gov.uk](mailto:NavWarnings@UKHO.gov.uk), Tel: 01823 353448 (direct line) Fax: 01823 322352.
4. The UKHO should be notified of any changes to the existing installations as offshore work progresses (e.g. structure height changes, new/altered aids to navigation). Please send notifications and correspondence to [SDR@ukho.gov.uk](mailto:SDR@ukho.gov.uk).

Best regards

**Andy Wilson – On behalf of Offshore Energy**

Senior Geospatial Analyst

Marine Geospatial Data Management Team

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[gov.uk/ukho](http://gov.uk/ukho)



Find out more about our market-leading  
ADMIRALTY Maritime Data Solutions:

[admiralty.co.uk](http://admiralty.co.uk)    



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