marinescotland



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PROFORMA FOR RECORDING MARINE SCOTLAND'S CONSIDERATION OF A PROPOSAL AFFECTING A POTENTIAL/DESIGNATED SAC or SPA

SITE: Aberdeen Bay Offshore Wind Farm

FILE REF: 018/OW/AOWFL - 9

Appropriate Assessment Conclusion

Marine Scotland (the Licensing Authority) ascertains that the installation, operation and decommissioning of Aberdeen Bay Offshore Wind Farm will not adversely affect the integrity of the SACs and SPAs listed in section 1a. as long as the conditions detailed in section 3d are complied with.

1a. Name of Natura site affected & current status available from:

http://gateway.snh.gov.uk/sitelink/siteinfo.jsp?pa_code=8409 http://gateway.snh.gov.uk/sitelink/siteinfo.jsp?pa_code=8512

Moray Firth SAC
River Dee SAC
River South Esk SAC
Isle of May SAC
Firth of Tay and Eden Estuary SAC
Berwickshire and Northumberland Coast SAC

Buchan Ness to Collieston Coast SPA Caithness & Sutherland Peatlands SPA Copinsay SPA East Caithness Cliffs SPA Fair Isle SPA

raii isie SPA

Fetlar SPA

Firth of Forth SPA

Firth of Tay and Eden Estuary SPA

Forth Islands SPA

Foula SPA

Fowlsheugh SPA

Hermaness, Saxa Vord and Valla Field SPA

Hoy SPA

Loch of Strathbeg SPA

Montrose Basin SPA

North Caithness Cliffs SPA

Noss SPA

Orkney Mainland Moors SPA

Otterswick & Graveland SPA

Ronas Hill - North Roe & Tingon SPA

Sumburgh Head SPA

Troup, Pennan and Lion's Head SPA

Upper Solway Flats and Marshes SPA

Ythan Estuary, Sands of Forvie and Meikle Loch SPA

1b. Name of component SSSI if relevant

Not relevant for this assessment

1c. European qualifying interests & whether priority/ non-priority

Moray Firth SAC	River Dee SAC
Bottlenose Dolphins	Freshwater Pearl Mussel
Subtidal sandbanks	Atlantic Salmon
	Otter
River South Esk SAC	Isle of May SAC
Freshwater Pearl Mussel	Grey seals
Atlantic Salmon	Inshore sublittoral rock reefs
Firth of Tay and Eden Estuary SAC	Berwickshire and Northumberland Coast
Harbour seals	SAC
Subtidal sandbanks	Grey seals
Estuaries	Intertidal mudflats and sandflats
Intertidal mudflats and sandflats	Reefs
	Sea caves
	Shallow inlets and bays

Buchan Ness to Collieston Coast SPA Black-legged kittiwake Common guillemot Fulmar Herring gull Shag	Caithness & Sutherland Peatlands SPA Red-throated diver
Copinsay SPA	East Caithness Cliffs SPA
Fulmar	Fulmar
Fair Isle SPA	Fetlar SPA
Fulmar	Fulmar
Northern gannet	
Firth of Forth SPA	Firth of Tay and Eden Estuary SPA
Common scoter	Common eider
	Common scoter
Forth Islands SPA	Foula SPA
Fulmar	Fulmar
Northern gannet	Red-throated diver
Fowlsheugh SPA Black-legged kittiwake Common guillemot	Hermaness, Saxa Vord and Valla Field SPA Red-throated diver
Fulmar Herring gull Razorbill	
Hoy SPA Red-throated diver	Loch of Strathbeg SPA Sandwich tern Barnacle goose Pink-footed goose
Montrose Basin SPA	North Caithness Cliffs SPA
Common eider	Fulmar
Pink-footed goose	
Noss SPA	Orkney Mainland Moors SPA

Fulmar	Red-throated diver
Northern gannet	
Otterswick & Graveland SPA	Ronas Hill - North Roe & Tingon SPA
Red-throated diver	Red-throated diver
Sumburgh Head SPA	Troup, Pennan and Lion's Head SPA
Fulmar	Fulmar
Upper Solway Flats and Marshes SPA	Ythan Estuary, Sands of Forvie and Meikle
Barnacle goose	Loch SPA
	Common eider
	Common tern
	Sandwich tern
	Pink-footed goose

1d. Conservation objectives for qualifying interests:

SAC Species Conservation Objectives

Moray Firth SAC

To avoid deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and

To ensure for the qualifying species that the following are established then maintained in the long term:

- Population of the species as a viable component of the site
- Distribution of the species within site
- Distribution and extent of habitats supporting the species
- Structure, function and supporting processes of habitats supporting the species
- No significant disturbance of the species

Rivers Dee and River South Esk SACs

To avoid deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and

To ensure for the qualifying species that the following are maintained in the long term:

- Population of the species, including range of genetic types for salmon, as a viable component of the site
- Distribution of the species within site
- Distribution and extent of habitats supporting the species
- Structure, function and supporting processes of habitats supporting the species
- No significant disturbance of the species
- Distribution and viability of freshwater pearl mussel host species
- Structure, function and supporting processes of habitats supporting freshwater pearl mussel host species

Isle of May, Firth of Tay and Eden Estuary and Berwickshire and Northumberland Coast SACs

To avoid deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and

To ensure for the qualifying species that the following are maintained in the long term:

• Population of the species as a viable component of the site

- Distribution of the species within site
- Distribution and extent of habitats supporting the species
- Structure, function and supporting processes of habitats supporting the species
- No significant disturbance of the species

SPA Species Conservation Objectives

To avoid deterioration of the habitats of the qualifying species listed above for the Special Protection Areas or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained: and

To ensure for the qualifying species that the following are maintained in the long term:

- Population of the species as a viable component of the site
- Distribution of the species within site
- Distribution and extent of habitats supporting the species
- Structure, function and supporting processes of habitats supporting the species
- No significant disturbance of the species

PROPOSAL DETAILS

2a. Proposal title & name of consultee (i.e. applicant or competent authority)		
Application for consent under Section 36 of the Electricity Act 1989 and a Marine	Marine	
Licence under Part 4, Section 20 of the Marine (Scotland) Act 2010 to construct and	Scotland	
operate an offshore wind farm, Aberdeen Bay		
2b. Date of Consultation: SNH responses to consultation on 2 nd November 2011 and		
3 rd October 2012. Advice from Marine Scotland Science on 30 th and 31 st January		
2013.		
2c. Type of Case:		
Offshore Wind Farm, Aberdeen Bay		

2d. Details of proposed operation (inc. location, timing, methods):

Installation and operation of a European Offshore Wind Deployment Centre consisting of 11 turbines, inter-array and export cables. To be located 2-4.5km off the coast at Blackdog, Aberdeenshire and likely to be constructed in 2013 and 2014. The developer predicts that the installation of the 11 turbine foundations will take place over approximately 2 weeks (within a 2 year time period) and at most 4 turbines might be installed using piling techniques.

ASSESSMENT IN RELATION TO REGULATION 20 or 48

3a. Is the operation directly connected with or necessary to conservation management of the site? NO If YES give details:

The operation is not connected with or necessary to conservation management of the site.

If yes and it can be demonstrated that the tests in 3b have been applied to all the interest features in a fully assessed and agreed management plan then consent can be issued but rationale must be provided, including reference to management objectives. If no, or if site has several European

qualifying interests and operation is not directly connected with or necessary to the management of **all** of these then proceed to 3b.

3b. Is the operation likely to have a significant effect on the qualifying interest? Repeat for each interest on the site.

During the consultation phase of the licensing process, SNH concluded that the Aberdeen Bay Offshore Wind Farm development would have a likely significant effect on the following:

Moray Firth SAC – Bottlenose dolphin River Dee SAC – Salmon and Freshwater Pearl Mussel River South Esk SAC – Salmon and Freshwater Pearl Mussel Isle of May SAC – Grey seal Berwickshire and Northumberland Coast SAC – Grey seal

Due to the large distance (90km) between the Firth of Tay and Eden Estuary SAC and the proposed wind farm site no LSE was concluded for harbour seal as this species tends to forage over distances up to approximately 50km. Therefore this site will not be considered further in this assessment.

During the consultation phase of the licensing process, SNH concluded that the Aberdeen Bay Offshore Wind Farm development would have likely significant effect (LSE) on the qualifying species from the SPAs listed in table 1c above based on the level of connectivity.

The Licensing Authority believe that the identification of LSE by SNH is precautionary as other factors that relate to the magnitude of the effect, such as collision risk based on numbers of birds recorded at the site/flight height were not included in predicting LSE.

3c. Appropriate assessment of the implications for the site in view of the site's conservation objectives.

- i) Describe for each European qualifying interest the potential impacts of the proposed operation detailing which aspects of the proposal could impact upon them.
- ii) Evaluate the significance of the potential impacts, e.g. whether short/long term, reversible or irreversible, and in relation to the proportion/importance of the interest affected, and the overall effect on the site's conservation objectives. Record if additional survey information or specialist advice has been obtained.

SAC appraisal

SNH carried out a detailed appraisal of the proposed development submitted to The Licensing Authority on 2nd November 2012, this is summarised below:

For all the mobile species, impacts will occur away from the designated site area, so it is for the following conservation objectives to be considered against the potential impacts:

- Will the proposal cause significant disturbance to mobile species (bottlenose dolphins, grey seal and salmon) while they are outwith the SAC such that the viability of the SAC population is adversely affected?
- Will the proposal in any other way adversely affect the population viability of the SACs from which the mobile species are connected? This could include indirect impacts such as the degradation or loss of supporting habitats or feeding grounds which are outwith the SAC but which help to maintain the population of mobile species in the SACs in the long-term.

For freshwater pearl mussels, the conservation objective that requires consideration is:

• Distribution and viability of freshwater pearl mussel host species i.e. impacts on salmon may have an indirect effect on freshwater pearl mussel and if the salmon in the Rivers Dee and South Esk are assessed not to be at risk from an adverse effect on site integrity, then FWPM can also be ruled out as being at risk in both these SACs.

Several aspects of the development could have impacts on the qualifying features of the SACs listed above, during construction, operation and decommissioning:

Construction

- increased vessel traffic may lead to disturbance/ displacement or injury/death to seals through corkscrew injury
- Underwater noise from piling may lead to death, physical damage or behavioural avoidance in marine mammals or fish.
- Indirect effects including effects on prey species through water quality

Operation and Maintenance

- Vessel movements associated with maintenance could result in disturbance/ displacement
- Electro magnetic fields (EMF)could impact on salmon
- Activities could give rise to pollution

Decommissioning

 Similar impacts as construction although impacts should be less than those associated with construction.

SNH advised that these impacts could be reduced through mitigation:

- Vessel management plan to minimise the risk of injury and disturbance to seals and cetaceans
- Soft start procedures for piling
- Use of marine mammal observers and Passive Acoustic Monitoring (PAM) prior to piling

commencing

- restriction to percussive piling to avoid the months of July and August, and to avoid periods
 of darkness in order to reduce impacts on salmon migration and to marine mammals. This
 mitigation does not apply to drilled piles and other non-piling construction activities.
- Pollution prevention measures
- Burying of cables to reduce EMF

Advice received from Marine Scotland Science has suggested that piling restrictions during July and August would not be necessary to ensure no adverse effect on site integrity and may actually lead to an increased impact on bottle nose dolphins as the most sensitive time for them is winter and early spring. Avoiding those times when the weather is more likely to be calm may actually extend the period of impact, thus making it worse. Therefore this restriction has not been included in the conditions in section 3d below.

Impacts during construction and decommissioning are short term. Aberdeen harbour is in close proximity to the proposed wind farm area (approximately 7km). Seals and cetaceans have been recorded at the mouth of the harbour and are therefore accustomed to frequent vessel movements, however they are still likely to take avoiding action at certain levels of activity.

SNH advised that noise from piling is likely to lead to a temporary displacement of bottlenose dolphins and seals during and possibly after the piling activity. The noise could also act as a barrier to movement north and south of the wind farm, due to the preference by bottlenose dolphins and harbour seals to remain in coastal waters. Any displacement or barrier effect should be short lived, with a piling event lasting for a maximum of 4-6 hours. There are also alternative foraging areas available either side of the development area.

Adult salmon returning to their natal river are likely to take avoidance action during piling events, thus delaying entry into the natal river, however this can be mitigated against by diurnal restrictions preventing piling at night.

Soft start piling, and the use of marine mammal observers and PAM will reduce any physical impacts on dolphins, seals and salmon.

Disturbance and/ or displacement of seals and bottlenose dolphins during operation from vessel movements and activities associated with operation and maintenance are likely to be of lower intensity than during construction and mitigation detailed above will help minimise any impacts.

Pollution prevention measures will minimise the risk of polluting substances being released into the water.

The effects of EMF can be reduced by burying cables, this would minimise any impact on salmon migration.

SNH concluded that for the various SAC interests (bottlenose dolphins, grey seal, Atlantic salmon and freshwater pearl mussel that no adverse effects on site integrity will occur so long as conditions are attached to the consent to minimise impacts. These conditions are detailed in section 3d below.

In-Combination Effects

The key consideration for this part of the assessment is the anticipated brief duration of the most significant effects (i.e. construction noise) and the very small magnitude of the operational effects (e.g. vessel disturbance). It is recognised that the potential exists for an in-combination impact with a number of developments in the Moray Firth and Firth of Forth areas, particularly offshore wind farm proposals:

- Bottlenose dolphins from the Moray Firth SAC also occur in the Tay and Firth of Forth area and therefore must at least transit through the development area
- Grey seals from the Isle of May SAC and the Berwick and Northumberland Coast SAC are likely to occur in areas of other potential offshore renewable projects, particularly in the Firth of Forth
- Atlantic salmon from the River Dee SAC and River South Esk SAC may also occur in either the Moray Firth or Firth of Forth.

No simultaneous cumulative effects have been identified in-combination with other licensed projects. In the event that other projects propose construction at the same time as this project their incombination effects will be considered in the relevant appropriate assessment undertaken to inform licensing decisions for those projects.

The Licensing Authority agree with conclusions reached by SNH that in light of the SAC interests (bottlenose dolphins, grey seal, Atlantic salmon and freshwater pearl mussel) that no adverse effects on site integrity will occur so long as conditions are attached to the consent to minimise impacts.

iii) In the light of the assessment, ascertain whether the proposal will not adversely affect the integrity of the site for the European interests. Separate conclusions must be provided if the SAC and/or SPA and/or Ramsar site. If conditions required, proceed to 3d.

In light of the assessment, The Licensing Authority ascertains that the installation, operation and decommissioning of Aberdeen Offshore Wind Farm will not adversely affect the integrity of the Moray Firth, River Dee, River South Esk, Isle of May or Berwickshire and Northumberland Coast SACs as long as the conditions detailed in section 3d are complied with.

SPA Appraisal

This assessment draws together the key conclusions reached as part of the iterative process and where necessary refers to the relevant correspondence.

During the consultation phase SNH advised in their 1st appraisal (2nd November 2011) that the ES did not contain sufficient information to make a robust enough assessment to demonstrate that there would be no adverse effect on site integrity. SNH recommended that further work be undertaken in order to inform the Appropriate Assessment.

SNH recommended further work on:

Red-throated diver Common scoter Common eider Northern gannet Black-legged kittiwake Common guillemot Razorbill Sandwich tern Common tern

Herring gull

Puffin Pink-footed goose Barnacle goose Fulmar Shag

Following the submission of the addendum SNH advised (on 3rd October 2012) that the Aberdeen Bay Offshore Wind Farm has the potential to impact seabirds in the area directly through death from collision or indirectly through a loss of fitness by disturbing and displacing birds from an important feeding and moulting area, or by acting as a barrier. SNH concluded the following:

Displacement

The turbine envelope does not appear to coincide with any regularly-used or significant 'hotspots' of activity for any species; this includes birds on the surface (and therefore assumed to be using the site for foraging or other maintenance activities), and birds in flight. These findings are consistent with the physical characteristics of the site which, although relatively sheltered and suitable for foraging by a range of species, are similar to other sections of the coast to north and south.

For Eider and Common Scoter there was strong evidence that shallower water closer to the shore was preferred. For others, such as Red-throated Diver, Fulmar, Cormorant, Shag and terns, there was moderate evidence that adjacent sections of coast were preferred over the development site, at least during certain seasons and years. In the case of terns, concentrations of birds to the North of the site are probably linked to the proximity of important nesting colonies at Forvie, around 10km from the centre of the turbine array.

The moderate number of turbines and the relatively restricted turbine envelope suggests that displacement effects will be small relative to the total available foraging resource. Impacts could be mitigated by requiring a vessel management plan to minimise disturbance in areas where birds occur more frequently, and particularly at times of year when birds are moulting and therefore most vulnerable.

<u>Barrier</u>

The moderate number of turbines, relatively restricted turbine envelope and location of the deployment centre away from the Ythan estuary suggests that any barrier effects will be sufficiently restricted not to cause concern for any species.

The Licensing Authority agree with this therefore only collision risk is considered further. The methodology used for collision risk modelling in the addendum was approved by SNH. As the final turbine dimensions are not known yet the approach was to model the turbine option that gives the highest predicted collision rate. The avoidance rate used in the collision risk modelling was 98% and 99% for geese.

Further work presented in the addendum concluded that there would be no adverse effect on:

Red-throated diver – low risk of collision, low flight heights and low numbers in wind farm area.

Common scoter – modelling predicted up to 1 collision per year (taken from bird chapter, missing from HRA)

Common eider - low risk of collision less than 1 bird per year), low flight heights and low numbers in wind farm area

Northern Gannet – Modelling predicted up to 17 collisions per year, most gannets at wind farm site likely to come from the closest colony (Troup, Pennan and Lion's Head SPA), however gannet is not a qualifying species of this SPA.

Common guillemot – low risk of collision (less than 3 birds per year), low flight heights.

Razorbill - very low risk of collision, (less than 1 bird per year), low connectivity, low flight heights.

Puffin - very low risk of collision, low flight heights.

Pink-footed goose – modelling predicted 4 collisions per year.

Barnacle goose - modelling predicted 9 collisions per year.

Fulmar – low risk of collision, low flight heights (up to 7 birds per year)(taken from bird chapter)

The Licensing Authority agree with the conclusions reached in the addendum that there will be no adverse effect on site integrity for the above species for the SPAs listed in table 1c.

For the 5 species: common tern, herring gull, shag, black-legged kittiwake and sandwich tern which SNH had most concerns about in their first appraisal, further information was supplied by the applicant in the addendum. SNH also conducted their own assessment using the latest version of the collision model (SOSS, Band 2012). The collision rates were in line with those reported in the addendum.

Black-legged kittiwake – breeding season adult mortality predicted to be 25 birds which is attributable to Buchan Ness to Collieston Coast SPA (19 birds) and Fowlsheugh SPA (6 birds). These levels of mortality would be too low to give rise to any detectable population-level effects at these sites.

Shag – collision mortality calculated at less than one bird per year.

Common tern – collision mortality calculated at 1 bird per year for the current population, or 5 birds per year for a recovered population (see SNH appraisal 3rd October 2012 for full explanation).

Sandwich tern – SNH agreed with the addendum assessment that this species was uncommon across the development site and not considered to be at risk from collision.

Herring gull – the revised Rochdale envelope parameters presented in the addendum give a significantly lower rate of predicted mortality. The total breeding season mortality of 11 birds is apportioned to Aberdeen City non-SPA colonies (8 birds), Buchan Ness to Collieston Coast SPA (2 birds), Fowlsheugh SPA (1 bird) and Troup, Pennan and Lion's Head SPA (<1 bird). SNH were content with how these collisions were apportioned between the SPAs.

SNH concluded that there would be no adverse effect on site integrity for all species and all SPAs. The Licensing Authority agree with this conclusion.

In-combination Effects

Based on the known foraging ranges of breeding seabirds occurring in the proposed Aberdeen Bay Wind Farm site (Thaxter et al. 2012) it was identified in addendum that there was potential for incombination effects with the following:

- Beatrice Demonstrator Project (operational)
- Beatrice Offshore Wind Farm (proposed)
- Moray firth Offshore Wind Farm (proposed)
- Inch Cape Offshore Wind Farm (proposed)
- Firth of Forth Offshore Wind Farm (proposed)
- Neart na Gaoithe Offshore Wind Farm (proposed)

The applicant carried out an assessment of the potential in-combination effects where data was available for these proposals (see pages 61 – 99 of addendum). Based on the information available The Licensing Authority agree with the conclusions reached by the applicant that the impacts predicted by the Aberdeen Bay Win Farm will make only a very small contribution to the incombination effects.

iii) In the light of the assessment, ascertain whether the proposal will not adversely affect the integrity of the site for the European interests. Separate conclusions must be provided if the SAC and/or SPA and/or Ramsar site. If conditions required, proceed to 3d.

In light of the assessment, The Licensing Authority ascertains that the installation, operation and

decommissioning of Aberdeen Offshore Wind Farm will not adversely affect the integrity of the SPAs listed in table 1a.

3d. Conditions required.

Indicate conditions/modifications required to ensure adverse effects are avoided, & reasons for these.

Condition

Construction Method Statement

A construction method statement must be provided to The Licensing Authority 3 months prior to construction for agreement with relevant consultees. This should provide details on the following:

1. General Construction

This should include details of commencement dates, duration and phasing information of key elements of construction e.g. foundations, turbine placements, interarray cabling and landfall cabling as well as details of onshore activities for the substation. This statement should include measures to protect the marine environment (e.g. method and diurnal timing of piling, soft-start procedure, use of Marine Mammal Observers, Passive Acoustic Monitoring, method and depth of cable laying, pollution prevention measures etc) and be cross referenced with the Project Environmental Monitoring Programme. It must include piling restrictions out with daylight hours.

2. Vessel Management

Vessel details will be required prior to the Marine Licence being issued.

3. Export Cables

Details of the location and construction methods for the grid export cables, landfall site and substation, taking into account coastal processes and other environmental considerations

The export cables to be buried to a minimum depth to be agreed with The Licensing Authority and relevant consultees.

Project Environmental Monitoring Programme

A Project Environmental Monitoring Programme should be provided to The Licensing Authority 3 months prior to construction for agreement with relevant consultees. This plan should detail measures through all phases of the windfarm (pre, during and post construction) to prevent adverse impacts to marine mammals, birds, fish and habitats, and include species protection plans.

The plan should also detail how each and all contractors and sub contractors will be made aware of environmental sensitivities, what requirements they are expected to adhere to, how chains of command will work

Reason

To ensure all environmental issues are taken into account in designing the construction of the windfarm

To minimise disturbance and injury to marine mammals and fish, including Atlantic salmon (SACs/EPS).

To safeguard coastal processes in the wider Aberdeen Bay. To ensure all environmental issues are considered in the location and construction of the export cables.

To lessen potential EMF effects on salmon.

To ensure all environmental issues are taken into account during construction and operation of the windfarm. To minimise disturbance to marine mammals (SACs/EPS) and birds (SPAs).

including shore to vessel communications etc. In addition, we advise on the need for regular updates on construction activity, issues encountered and how these have been addressed.

There should be monitoring of the cables to see if they become re-exposed and, if so, action taken to remedy this.

A Decommissioning Plan.

A decommissioning plan will be required for the entire scheme. We recommend that this is an iterative process and that an initial decommissioning strategy is produced. Timescale for the production, consultation and implementation of a decommissioning plan will be captured in the section 36 consent conditions.

In addition to decommissioning the entire scheme, details of decommissioning / replacing individual turbines should be set out taking into account criteria developed with The Licensing Authority on if / when individual turbines should be removed.

To lessen potential EMF effects on salmon.

To ensure all environmental issues are taken into account in decommissioning of the wind farm or individual turbines

4. RESPONSE

a) The Licensing Authority Comments

For The Licensing Authority advice to other authorities:

Will not adversely affect integrity of the protected sites listed in 1a.

For The Licensing Authority response to request for opinion on effects of permitted development:

Will not adversely affect integrity of the protected sites detailed in 1a.

For The Licensing Authority response to application:

Licence process will continue with conditions

Name of assessor	Finlay Bennet – EIA/HRA Specialist
Date	16/01/2013
Name of approver	Gayle Holland – EIA/HRA Compliance manager
Date	26/02/2013