

Aberdeenshire Council

Our Ref: ENQ/2026/0499
Your Ref: MS-00011410 / MS-00011409

Ask for: Galina Fomina
Tel: [Redacted]
Email: [Redacted]

Marine Directorate
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

13 April 2026

Dear Sir/Madam

Marine Licence Consultation for Consultation under Section 36 of the Electricity Act 1989, the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009 for the Erection of Offshore Wind Farm and Associated Infrastructure at Aspen Offshore Wind Farm, Approximately 84km East Of Peterhead

Thank you for the above consultation. As the additional information provided relates to offshore element of the development, Aberdeenshire Council has no objections or comments on it at this time.

Yours faithfully
[Redacted]

Paul Macari
Head of Planning and Economy

**Dee District
Salmon Fishery
Board**



Dee District Salmon Fishery Board

Amy Woodward
Marine Licensing and Consenting Casework Officer
Licensing Operations Team
Marine Directorate
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

By email to MD.MarineRenewables@gov.scot
27th April 2026

Dear Amy,

ELECTRICITY ACT 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE (SCOTLAND) ACT 2010

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

MARINE AND COASTAL ACCESS ACT 2009

The Marine Works (Environmental Impact Assessment) Regulations 2007

MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – Approximately 84km east of Peterhead.

Background

On behalf of the Dee District Salmon Fishery Board (Dee DSFB) we welcome the opportunity to respond to the **Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation.**

Designations & Conservation Status - Atlantic Salmon

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 International Union for Conservation of Nature's (IUCN) latest Red List of Threatened Species (December 2023) reclassified Atlantic salmon from 'Least Concern' to 'Endangered' in Great Britain because of a 30-50% decline in British populations since 2006 and 50-80% projected between 2010-2025. The Scottish Government has released a Scottish Wild Salmon Strategy which calls on government agencies, as well as the private sector, to prioritise the protection and recovery of Scotland's wild Atlantic salmon populations.

Salmon and many other key species of diadromous fish have also been identified as Priority Marine Features and UKBAP Priority Species.

Designations & Conservation Status - Other Species

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.

Comments

The Dee DSFB welcomes the opportunity to respond to the **Aspen Offshore Wind Farm – EIA Section 36 consent and Marine License Applications - Additional Information Consultation**. We generally find it difficult to comment on the approaches and findings outlined in the EIA in relation to Atlantic salmon due to lack of robust scientific research, a key requirement to fully understand potential interactions.

The additional information provided focuses on information for Blue Carbon, Ornithology, Marine Mammals, Turbot Bank nature conservation Marine Protected Area, and Socio-cultural and socio-economic impacts and as such does not alter assessments for Atlantic salmon.

We would support Fishery Management Scotland's previous representation to this consultation.

1. For diadromous fish, there is a lack of current information on their use of the marine environment, and an apparent lack of ambition and resource to study and understand the potential impacts of developments on diadromous fish.
2. We remain keen to work constructively with the developers, Marine Directorate and NatureScot to identify appropriate monitoring and research programmes which will allow us to be able to

assess the acknowledged risks of proposed marine 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. Given the scale of development in the North Sea, developers should be required to work together to fund strategic monitoring, to allow more certainty for all involved.

The scale of proposed offshore developments and other technical approaches to marine renewables development represents a step-change in the exposure of marine animals of high cultural and economic significance to attendant risks. As highlighted above, understanding of many of these risks is insufficient to support proposals for mitigation even at the stage when substantial developments are being submitted for licensing. The cumulative impact of such proposals, alongside those developments already submitted or likely to follow in the near future is potentially even greater. We believe that more needs to be done to ensure that the best scientific talent is made available to find practicable ways to address the unresolved uncertainties.

3. We would request that the developer contributes to monitoring which could address evidence gaps identified the ScotMER Fish Specialist Receptor Group evidence map. With reference to DF.01-2022: Spatial and Temporal Distribution, DF.02-2022: Survival and progression rates in relation to passing through marine renewable areas, DF.03-2022 Influence on migratory patterns due to cable deployment (EMF), DF.04-2022: Effects on diadromous fish behaviour including fish aggregations around devices (ecological traps) and DF.05-2022: Impacts of noise, including particle motion and direct impact high intensity sound from pile driving and detonation of unexploded ordnance. Potentially causing both direct physical impact and displacement e.g. less foraging more predation.
4. A more widespread body of scientific research and its effective incorporation into environmental decision-making is required to achieve the dual objectives of marine development and ensuring that human impact on the marine environment is managed to protect and enhance important marine ecosystems and species. The Dee DSFB would recommend that further robust scientific research into salmonid migration and potential stressors within the marine environment is undertaken to protect this species, which is ecologically, culturally and economically important to Scotland.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

[Redacted]

Edwin third

River Operations Manager, Dee District Salmon Fishery Board

**Department of
Agriculture,
Environment and
Rural Affairs**

From: [DAERA Marine Information Requests](#)
To: [MD Marine Renewables](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 30 April 2026 09:44:40
Attachments: [image002.png](#)
[image003.png](#)

Hi
Apologies for the delay. This is a nil return from MFD. Thanks
Eamonn

Eamonn Brady | Marine Plan Team | Department for Agriculture, Environment and Rural Affairs
Ground Floor | Clare House | 303 Airport Road West | Belfast | BT3 9ED
Contact: [| **Tel:** [Redacted] | **DD:** [Reda



Department of
**Agriculture, Environment
and Rural Affairs**
www.daera-ni.gov.uk

***Sustainability** at the heart of a
living, working, active landscape
valued by everyone.*

Edinburgh Airport

From: [Safe Guarding](#)
To: [MD Marine Renewables](#)
Cc: [Safe Guarding](#)
Subject: MS-00011410 and MS-00011409 Cerulean Winds Aspen Project Limited - Aspen Offshore Wind Farm
Date: 23 March 2026 10:26:58
Attachments: [image001.png](#)

Good morning,

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

With best regards,
Claire

Claire Brown
Aerodrome Safeguarding & Compliance Officer




Our values

t: [Redacted] m: [Redacted]

My working hours are Monday-Friday
www.edinburghairport.com

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

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**Highland and
Islands Airports
Limited**

From: [Safeguarding](#)
To: [MD Marine Renewables](#)
Cc: [Safeguarding](#)
Subject: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 30 April 2026 15:06:06
Attachments: [image001.png](#)
[values2025_49f0881e-b581-44a4-b961-1aecd2620b56.png](#)

OFFICIAL

Your Ref: MS-00011410 and MS-00011409

Our Ref: 2025/197/INV

Dear Amy,

Proposal: Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm
Location: Approximately 84km east of Peterhead.

Thank you for checking HIAL's lack of response to the additional information submitted in regard to this development. I heartily apologise. I can only assume that I must have been forced to do a computer reboot (have to do a lot of them) as the email I thought I had sent back to you was sat in the "Draft" folder.

A response of **No Objection** with the conditional request of a construction plan was returned by HIAL on 23/10/2025. As the proposed development is outwith HIAL's Safeguarding area for Inverness Airport, there are no operational safeguarding concerns. However, the condition was applied as we wish to confirm if the turbines are going to be constructed in situ or as in the case of floating turbines are they to be constructed on the mainland and towed out to the operational area? If they are constructed on the mainland or indeed just off the coast then there may be a Safeguarding impact that would need to be assessed.

Other than the construction concern, HIAL does not require any further consultation for this development.

Thank you again for checking our failure to submit a response, it was very much appreciated.

Regards,

Andy Brown
HIAL Safeguarding Officer



Safeguarding
Highlands and Islands Airports Ltd
Inverness Airport Dalcross IV2 7JB
www.hial.co.uk

Our Values



Historic Environment Scotland



HISTORIC
ENVIRONMENT
SCOTLAND

ÀRAINNEACHD
EACHDRAIDHEIL
ALBA

By email to:

MD.MarineRenewables@gov.scot
Amy Woodward
Marine Directorate
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300069863
Your ref: MS-00011410
MS-00011409
18 March 2026

Dear Amy Woodward

**The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2007
Cerulean Winds Aspen Project Limited - Aspen Offshore Wind Farm – Additional
Information**

Thank you for consulting us on this Additional Information which we received on the 13 March 2026. We have reviewed the contents and considered the proposed development in terms of our historic environment interests. This covers cultural 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.

Your archaeological and cultural heritage advisors will also be able to offer advice on impacts on the historic environment. This may include topics covered by [our advice-giving role](#), and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

Our advice

We have reviewed the contents of the Additional Information. This primarily relates to technical topics including Blue Carbon, Ornithology, Marine Mammals, Turbot Bank nature conservation Marine Protected Area and Socio-cultural and socio-economic impacts. We can confirm that the Additional Information would not alter our advice provided in our response dated 23 September 2025. We are of the opinion that the offshore elements of the development proposals do not raise historic environment issues in the national interest.

Our decision not to object should not be taken as our support for the proposals. Decision makers are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision making. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.



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. If you have questions about this response, please contact Kevin Mooney at [Redacted]

Yours sincerely

Historic Environment Scotland

Hywind

From: [Marta Kucharska](#)
To: [MD Marine Renewables](#)
Cc: [Andy Edgar](#); [Polly Haslam](#); [Maria Pagla](#); [William Munn](#); [Amy Woodward](#); [Ben Walker](#); [Anna Shenton](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 21 April 2026 15:29:43
Attachments: [image002.png](#)
[image003.png](#)

Dear Sir / Madam,

On behalf of Hywind Scotland I would like to confirm that we don't have any comments on the latest documents regarding the Aspen Offshore Wind Farm, but we would like to stay informed about further steps in the application process.

Kind Regards,

Marta Kucharska

Offshore environmental specialist

REN EUR RD

Equinor Polska sp. z o.o.

[Redacted]

[Redacted]

Visitor address: Aleja Grunwaldzka 472C, 80-309 Gdansk
Marszalkowska 107, 00-110 Warszawa

www.equinor.com



 Please consider the environment before printing this email

Kincardine Offshore Wind Farm

From: [Catrin Fowden](#)
To: [MD Marine Renewables](#)
Cc: [Ian Broadbent](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 14 April 2026 12:52:27
Attachments: [image001.png](#)

Dear Sirs

KOWL has reviewed the Cerulean Winds Aspen Offshore Windfarm Additional Information regarding blue carbon, ornithology, Marine Mammals, Turbot Bank nature conservation Marine Protected Area and Socio-cultural and socio-economic impacts, and KOWL has the following observations and comments.

The work on the Blue Carbon assessment is timely and provides a sound exemplar for future projects required to conduct similar analyses in future.

Whilst it is good to see that the Guillemot PVA has been re-run in line with the NatureScot guidance, it is surprising to see that the Gannet colony at Troup Head appears to have been excluded from the PVA. This is the closest Gannet colony to the Aspen site, with an estimate of 5600 AON/AOS in 2021 according to the Seabirds Count census. We note that the original scoping report states that this Gannet colony is “of relatively recent origin”, but the numbers of Gannet AOS/AONs at Troup Head since the 1998-2002 census are very similar to (and now exceed) those on Fair Isle, which has been included in the analysis. We feel that the effects of the proposed Aspen Offshore Windfarm and neighbouring developments on this growing Gannet colony at Troup Head should be assessed more thoroughly, and the PVA should be conducted for this species at the Troup, Pennan and Lion’s Head SPA despite the Gannet colony not being a qualifying breeding feature for this SPA. The current analysis includes Kittiwakes, Razorbills and Guillemots from the Troup Head site, so it is all the more surprising that this sizeable Gannet colony has been excluded.

Notwithstanding the comments above, the additional clarifications provided by the developer are helpful and thorough and KOWL are grateful for the opportunity to provide comments.

Kind Regards

Ian Broadbent and Catrin Fowden

Joint Radio Company

From: [Joint Radio Company](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#)
Subject: Re: Aspen Offshore Wind Farm - Cerulean Winds Aspen Project Limited - Application
Date: 17 March 2026 10:10:13

If any details of this proposal change, particularly the position or scale of any structures (including turbine(s)), this clearance will be void and re-evaluation of the proposal will be necessary.

Dear Amy,

Planning Ref: MS-00011410 and MS-00011409

Name/Location: Aspen Offshore Wind Farm (Cerulean Winds)

Thank you for the Additional Information provided for this planning application; we can see and have reviewed the updated / added information.

It appears that the turbine positions and sizes remain the same as we cleared in our last response on 15th September 2025. Provided that the locations and dimensions of the turbines have in fact stayed the same, our last Clearance on 15th September 2025 for the offshore element of this development still stands at the time of this response.

Please see a copy of the details used in the response for reference below:

Max. Tip Height: 310m
Max. Hub Height: 170m (*calc.*)
Max. Rotor Radius: 140m

 This proposal is **cleared within the design envelope above - subject to 50m Micrositing*** - with respect to radio link infrastructure operated by the local energy networks.

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom

Office: 02476 932 185

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries)

We maintain your personal contact details and are compliant with the Data Protection Act 2018 (DPA 2018) for the purpose of 'Legitimate Interest' for communication with you. If you would like to be removed, please contact enquiries@jrc.co.uk

On Mon, 15 Sep, 2025 at 6:50 AM , Joint Radio Company <wftracker@jrc.co.uk> wrote:

If any details of this proposal change, particularly the disposition or scale of any turbine(s), this clearance will be void and re-evaluation of the proposal will be necessary.

Dear Amy

Planning Ref: MS-00011410 and MS-00011409

Name/Location: Aspen Offshore Wind Farm

Thank you for the opportunity to comment on this application. We have noted the changes in turbine size and number of turbines, since the scoping application.

Site Centre:



Development Description: 72 wind turbines on floating foundations.

NB. Onshore elements of this development are not included in this application, and as such have not been included or assessed by JRC; separate clearance will need to be sought for any onshore structures due to protected links in proximity to the intended landfall site.

Max. Tip Height: 310m

Max. Hub Height: 170m (calc.)

Max. Rotor Radius: 140m

This proposal is **cleared within the design envelope above - subject to 50m Micrositing*** - with respect to radio link infrastructure operated by the local energy networks.

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom

Office: 02476 932 185

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Registered in England & Wales: 2990041

[About The JRC | Joint Radio Company | JRC](#)

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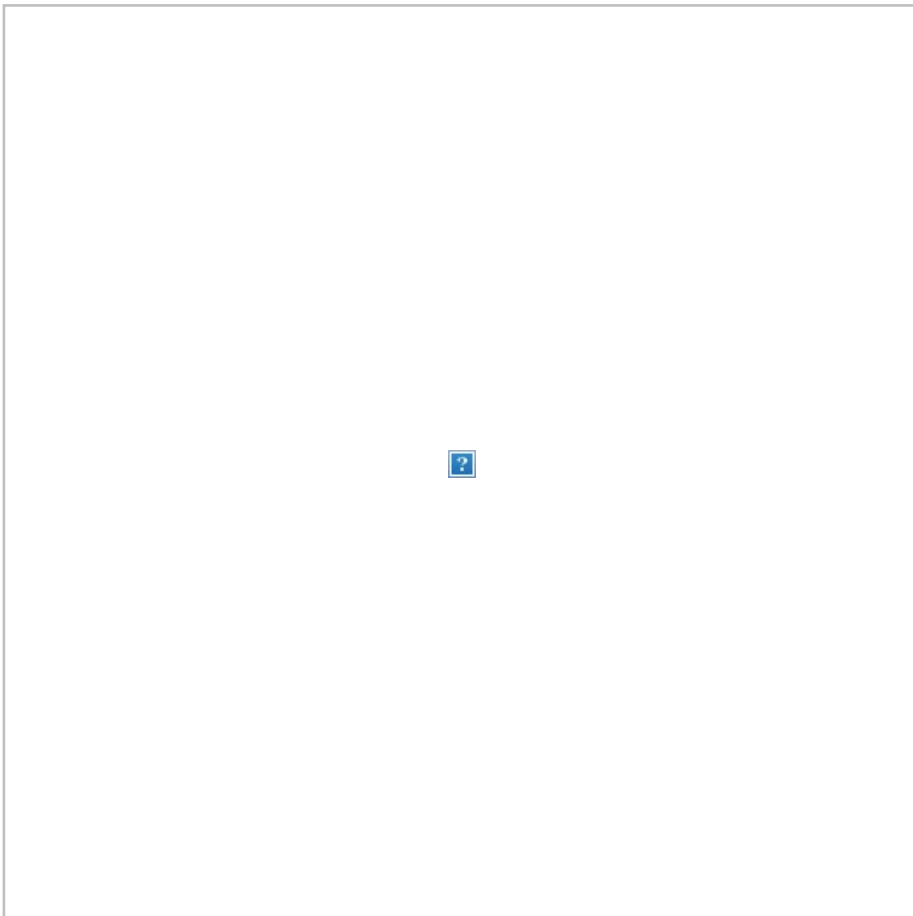
On Thu, 26 Jun at 2:00 PM , Joint Radio Company <wftracker@jrc.co.uk> wrote:

Dear Lauren,

Planning Ref: SCOP-0066

Site Name: Aspen Offshore Wind Farm

Site Centre at location:



Number of Wind Turbines: 72

Tip Height: 310m

This offshore proposal is ***cleared*** - **subject to 50m Micrositing** - with respect to radio link infrastructure operated by the local energy networks.

NB: Any onshore structures associated with this development will need to be submitted for clearance.
This clearance applies only to the offshore elements of this development.

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal. Please note that due to the large number of adjacent radio links in this vicinity, which have been taken into account, clearance is given specifically for a location within the declared grid reference (quoted above).

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, you are advised to seek re-coordination prior to submitting a planning application, as this will negate the possibility of an objection being raised at that time as a consequence of any links assigned between your enquiry and the finalisation of your project.

JRC offers a range of radio planning and analysis services. If you require any assistance, please contact us by phone or email.

Regards

Wind Farm Team

Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom

Office: 02476 932 185

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Registered in England & Wales: 2990041

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On Mon, 16 Jun at 10:53 AM , Nicole Clark [Redacted] wrote:
Good morning,

I am writing to you today on behalf of Cerulean Aspen Project Limited with regards to the Aspen Offshore Wind Farm. Thank you for responding to the Aspen OWF Scoping Report, we appreciate your consideration. The drafting of the Environmental Impact Assessment Report is now in progress, and as such we would like to share some updates to certain parameters associated with the project as the design develops.

A number of design parameters have been refined since the production of the Scoping Report, both in response to the assessment process for the

Environmental Impact Assessment, but also in response to further engagement with component suppliers in order to accommodate the necessary degree of design flexibility to support ongoing engineering works. A description of the changes and the reasoning for each is presented in the table below.

Design Parameter	Scoping Parameter	EIAR Parameter	Reasoning
Wind Turbine Generator maximum tip height	283 m	310 m	The Scoping Report was based on standard parameters provided by manufacturers in an initial request for information. Following detailed discussions with suppliers, an additional degree of flexibility is required to accommodate possible variations in maximum blade lengths due to site conditions, which would be confirmed during detailed engineering design after the consent application. As such, it has been necessary to increase the maximum top height for the turbines to accommodate the increase in blade lengths.
Maximum number of Wind Turbine Generators	67	72	The maximum number of turbines in the Scoping Report was based on an assumed use of 15MW rated WTGs to achieve the nominal generation capacity for Aspen of 1,008MW. Following further engagement with turbine suppliers, it has been necessary to include an option for a reliance on a 14MW rated WTG (depending on final turbine supplier). To still achieve the nominal generation capacity, it is necessary to increase the maximum number of WTGs for Aspen to 72.

Whilst the Applicant considers that these are changes are minor and would not change the conclusions of the Scoping Report, please could you review the revised parameters against your original response and confirm whether your previous remains valid?

If you require any further information, please do not hesitate to get in contact.

Kind regards,
Nicole



www.gobeconsultants.com

Nicole Clark

Consultant, GoBe Consultants

DD:

HQ: 01626 323890

[Redacted]

Suites B2 & C2, Higher Mill, Higher Mill Lane, Buckfastleigh, Devon, TQ11 0EN



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Marine Analytical Unit

From: [Christopher Bradbury](#)
To: [MD Marine Renewables](#); [Amy Woodward](#)
Cc: [Jonathan Edosomwan](#); [Marine Analytical Unit](#); [Yousaf Kanan](#); [Peter Greene](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information – Response Requested by 28 April 2026
Date: 20 April 2026 09:11:50
Attachments: [image001.png](#)

Hi Amy,

The additional information provided in response to the comments around socio-cultural impacts and the use of a short list of ports for assessing the operation and maintenance phase does not change the MAU's initial response. No further assessment has been undertaken by the applicant. The applicant makes it clear that they believe this would not be proportionate or in line with established industry practice, and that further assessments and stakeholder engagement will happen at a later date. While the applicant has provided rationale for their decision to delay a fuller assessment of impacts to a later stage. The MAU is unable to comment on the post consent stakeholder engagement that will occur to inform the assessment of socio-cultural impacts or the further analysis of socio-economic impacts once port locations are known, especially when no further information on this process or methodology has been provided. Therefore, the conclusions reached in the MAU's initial response remain valid.

Best regards,

Chris

Marine Directorate
– Science,
Evidence, Data and
Digital



E: [Redacted]

AMY WOODWARD
MARINE LICENSING AND CONSENTING CASEWORK OFFICER
LICENSING OPERATIONS TEAM
MARINE DIRECTORATE
SCOTTISH GOVERNMENT

28 April 2026

RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information

Advisors from the SEDD Marine Renewables & Ecology Team have reviewed the above request and provide the following advice.

The MD-SEDD oceanography advisor has reviewed Section 5.5. of the Environmental Impact Assessment Report and Habitats Regulations Appraisal Addendum for Aspen Offshore Wind Farm (hereafter referred to as the additional information). This section clarifies the potential impact on the Turbot Bank ncMPA due to sediment plums arising from installation activities, most notably OTC installation activities. The Offshore Environmental Impact Assessment Report (EIAR) relied on numerical modelling evidence from the Muir Mhor OWF, arguing that “given the close proximity, similarity in environmental conditions and comparable scale of works, the numerical model results for the Muir Mhòr OWF are considered to provide an appropriate analogue for cable installation at the Proposed Development.” The EIAR did not provide an assessment of the impact of sediment plums on Turbot Bank, and only considered the Sothern Trench ncMPA, the southernmost corner of which is just within the marine and coastal processes 10 km Zone of Influence (Zoi) identified in the EIAR.



The additional information reiterated much of the information provided in section 7.7.17 of the EIAR, and applying it to an assessment of the Turbot Bank ncMPA. MD-SEDD advise that the Turbot Bank ncMPA does not appear to be within the Zol but it does lie to the south east of the offshore transmission cable corridor. MD-SEDD therefore advise that, due to the residual current in the region, there is a risk that low levels of suspended sediment could be transported towards and settle within the Turbot Bank ncMPA during OTC construction activities.

MD-SEDD, however, agree with the additional information that this would be very low levels and would be spatially limited and temporary in duration.

Yours sincerely,

Renewables and Ecology Team

Marine Directorate – Science, Evidence, Data and Digital



Maritime and Coastguard Agency

From: [navigation_safety](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Anna Shenton](#); [Ben Walker](#); [Nick Salter](#); [Immanuel Josy](#); [Vinu John](#); [Vaughan Jackson](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 27 April 2026 13:01:46
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Good afternoon, Amy.

Thank you for your correspondence regarding the updated information on the Cerulean Winds Aspen Project (Aspen Offshore Wind Farm).

We note that the additional information submitted by the developer is in regard to the following:

- Blue Carbon
- Ornithology
- Marine Mammals
- Turbot Bank nature conservation Marine Protected Area
- Socio-cultural and socio-economic impacts

After review of the above additional information, it was noted that it is not generally in regard to Shipping and Navigation and as a result is likely to have only a negligible impact. As such, our current position on the project which was submitted on 19th September 2025, has not changed and we have no further comment at this stage.

If you have any further questions regarding this response, then please do get in touch.

Kind regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
Marine Safety and PNT Services

[Redacted]

[Redacted]



Maritime &
Coastguard
Agency

Maritime & Coastguard Agency

Bay 2/25, Spring Place
105 Commercial Road,
Southampton SO15 1EG



Safer Lives, Safer Ships, Cleaner Seas
www.gov.uk/mca

Ministry of Defence



Defence Infrastructure Organisation

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

Application Ref: MS-00011410 and MS-00011409

Our Reference: DIO10066295

E-mail: DIO-Safeguarding-Wind@mod.gov.uk

Amy Woodward
Scottish Government
Licensing Operations Team
Marine Directorate
Victoria Quay
EDINBURGH
EH6 6QQ

26 March 2026

Dear Amy

ELECTRICITY ACT 1989

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

The Electricity (Applications for Consent) Regulations 1990

MARINE (SCOTLAND) ACT 2010

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

MARINE AND COASTAL ACCESS ACT 2009

The Marine Works (Environmental Impact Assessment) Regulations 2007

MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – Approximately 84km east of Peterhead.

Thank you for consulting the Ministry of Defence (MOD) on the additional information submitted in support of the above Section 36 and Marine Licences applications for the proposed Aspen Offshore Wind Farm development.

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

This consultation relates to the Applicant's submission of additional information in relation to the following:

- Blue Carbon
- Ornithology
- Marine Mammals
- Turbot Bank nature conservation Marine Protected Area
- Socio-cultural and socio-economic impacts

After reviewing the submitted documents it is understood that the additional information does not seek to amend either the locations or dimensions of any of the proposed Wind Turbine Generators, nor make any changes to the offshore export cables or their landfall.

The MOD previously responded to the consultation on this application with a letter to the Licensing Operations Team, Marine Directorate dated 23 October 2025. The MOD position remains that the MOD objects to the proposed development on the grounds of the unacceptable impact that the development would have on air defence radar systems deployed at RRH Buchan.

The MOD must emphasise that the advice provided within this letter is in response to the information detailed in the Applicant's Covering Letter dated 27 February 2026 and the Environmental Impact Assessment Report and Habitats Regulations Appraisal Addendum, Revision 1.0, dated February 2026. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

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

Yours sincerely

[Redacted]

Wendy Talbot
Assistant Safeguarding Manager

National Air Traffic Services

From: [NATS Safeguarding](#)
To: [MD Marine Renewables](#); [Amy Woodward](#); [Anna Shenton](#); [Ben Walker](#)
Cc: [NATS Safeguarding](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026 [SG37075]
Date: 30 April 2026 09:10:46
Attachments: [image001.png](#)
[RE SCOP-0066 - Cerulean Winds Aspen Project Limited - Aspen Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 23 March 2025 SG37075.msg](#)

Amy,

For the avoidance of doubt, NATS has no additional comments in relation to the newly submitted information.

Our stance remains as previously provided (attached),

Regards,

Alasdair

NATS Safeguarding

NATS Internal

From: [NATS Safeguarding](#)
To: [MD Marine Renewables](#)
Cc: [Lauren Cowan](#); [Judith Horrill](#)
Subject: RE: SCOP-0066 - Cerulean Winds Aspen Project Limited - Aspen Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 23 March 2025 [SG37075]
Attachments: [image001.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[SG37075 Cerulean Winds Aspen Project Limited Wind Farm - TOPA Issue 1.pdf](#)

Our Ref: SG37075

Dear Sir/Madam

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

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA SG37075.

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

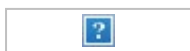
In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland)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

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

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

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

Yours faithfully



NATS Safeguarding
E: natssafeguarding@nats.co.uk
4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



From: NATS Safeguarding

Sent: 14 March 2025 13:46

To: MD.MarineRenewables@gov.scot

Cc: [Redacted]

Subject: RE: SCOP-0066 - Cerulean Winds Aspen Project Limited - Aspen Offshore Wind Farm - Consultation on Request for Scoping Opinion - Response Required by 23 March 2025 [SG37075]

Our Ref: SG37075

Dear Sir/ Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams. In the timeframe given to us we have been unable to thoroughly investigate the effects of the proposed development on our Operations, however, the relevant teams are being consulted.

Based on our preliminary technical findings, the proposed development does conflict with our safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal. We will notify you within 4-6 weeks of the results of our operational assessment. Only if this assessment shows the impact to be acceptable will we be able to withdraw our objection.

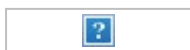
We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission for a wind farm. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf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

In the event that any recommendations made by NATS are not accepted, local authorities are further obliged to notify both NATS and the Civil Aviation Authority ("CAA") of that fact (which may lead to the decision made being subject to review whether by the CAA referring the matter for further scrutiny or by appropriate action being taken in the courts).

As this further notification is intended to allow the CAA sufficient time to consider whether further scrutiny is required, we understand that the notification should be provided prior to any granting of permission. You should be aware that a failure to consult NATS, or to take into account NATS's comments when deciding whether to approve a planning application, could cause serious safety risks for air traffic.

If you have any queries regarding this matter you can contact us using the details as below.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

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

Technical and Operational Assessment (TOPA)

For Cerulean Winds Aspen Project
Limited

Wind Farm Development

NATS ref: SG37075

Issue 1

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Publication History

Issue	Month/Year	Change Requests and summary
1	May 2025	Scoping Request

Document Use

External use: Yes

Referenced Documents

1. Background

1.1. En-route Consultation

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

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

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

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

2. Scope

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

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

3. Application Details

Scottish Government submitted a request for a NATS technical and operational assessment (TOPA) for the development at Cerulean Winds Aspen Project Limited Wind Farm. It will comprise a large number of turbines each up to 282m tall contained within the boundary points detailed below and shown in the diagrams contained in Appendix B.

Point	Lat	Long	East	North
a1	57.7624	-0.4408	492870	875815
a2	57.8025	-0.3084	500636	880467
a3	57.8271	-0.1806	508156	883399
a4	57.8409	-0.1350	510823	885012
a5	57.7707	-0.0380	516804	877356
a6	57.7232	-0.0385	516928	872075
a7	57.6974	-0.0774	514693	869139
a8	57.6299	-0.2993	501659	861269

Table 1 – Development Details

4. Assessments Required

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

En-route Surv	Lat	Long	nm	km	Az (deg)	Type
Alanshill Radar	57.6431	-2.1655	56.0	103.7	86.4	CMB
Perwinnes Radar	57.2123	-2.1309	64.0	118.4	71.7	CMB
En-route Nav	Lat	Long	nm	km	Az (deg)	Type
None						
En-route AGA	Lat	Long	nm	km	Az (deg)	Type
None						

Table 2 – Impacted Infrastructure

4.1. En-route RADAR Technical Assessment

4.1.1. Predicted Impact on RADAR Allanshill (only that portion of the development within 60nm)

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

4.1.2. En-route operational assessment of RADAR impact

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

Unit or role	Comment
Prestwick Centre ATC	Unacceptable
Aberdeen ATC	Unacceptable
Military ATC	Acceptable

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

4.2. En-route Navigational Aid Assessment

4.2.1. Predicted Impact on Navigation Aids

No impact is anticipated on NATS' navigation aids.

4.3. En-route Radio Communication Assessment

4.3.1. Predicted Impact on the Radio Communications Infrastructure

No impact is anticipated on NATS' radio communications infrastructure.

5. Conclusions

5.1. En-route Consultation

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

Appendix A – Background RADAR Theory

Primary RADAR False Plots

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

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

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

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

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

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

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

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

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

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

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

Secondary RADAR Reflections

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

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

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

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

Shadowing

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

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

Terrain and Propagation Modelling

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

Appendix B – Diagrams

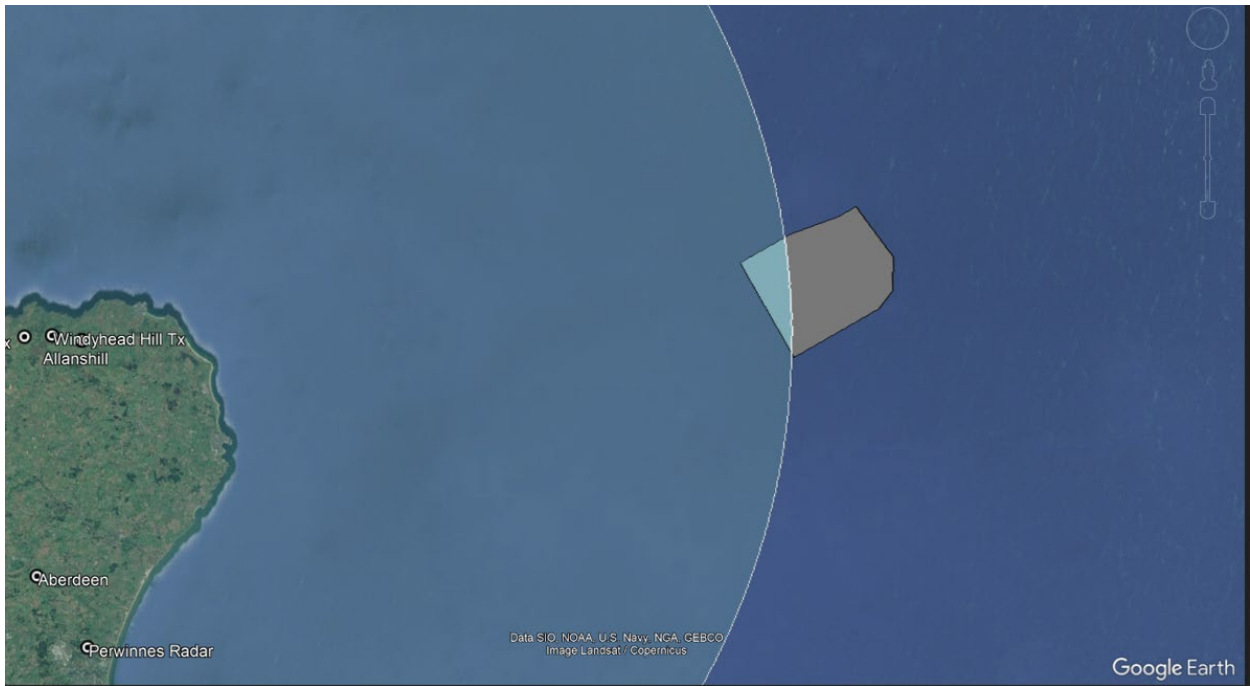


Figure 1: Proposed development location shown on an airways chart

Natural England

Date: 23/04/2026
Our ref: 543666
Your ref: MS-00011410 & MS-00011409



Tyneside House,
Skinnerburn Road,
Newcastle-upon-Tyne,
NE4 7RA

0300 – 060 3900

Licensing Operations Team
Marine Directorate
Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

Via email only

Dear Amy

Environmental Impact Assessment Report – Additional Information – Aspen Offshore Wind Farm

Thank you for seeking our advice on Environmental Impact Assessment Report – Additional Information in your consultation which we received on 13/03/2026.

ELECTRICITY ACT 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity (Applications for Consent) Regulations 1990

MARINE (SCOTLAND) ACT 2010

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

MARINE AND COASTAL ACCESS ACT 2009

The Marine Works (Environmental Impact Assessment) Regulations 2007

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). As the application is located outside English territorial waters then the advice from NatureScot, the statutory nature conservation body in offshore Scottish waters should be sought.

Due to our remit, our advice on this consultation is restricted to species within England and to protected species from English designated sites which may be impacted by the proposed wind farm.

We provide our advice based on the following documents:

- Additional Information – Cover Letter
- Additional Information – Addendum
- Additional Information – Appendix 2 – EIAR and RIAA Updates

Natural England note that the additional ornithological information requested was from NatureScot, and that the subsequent updates to the EIAR and RIAA are relevant to Scottish SPAs. Therefore Natural England has no advice on the present consultation.

For any queries relating to the content of this letter please contact me using the details provided below. To provide the further information requested in this advice and for subsequent consultations, please email consultations@naturalengland.org.uk

Yours sincerely

Dan Donald

Marine Higher Officer

Northumbria Marine Team

Email: [Redacted]

NatureScot

Marine Directorate
Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

28 April 2026

Our ref: CNS – REN – OWSF – INTOG – Cerulean - INTOG

Dear Sir/Madam,

CERULEAN WINDS – ASPEN OFFSHORE WIND FARM ADDITIONAL INFORMATION

ADDITIONAL INFORMATION TO THE APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER THE MARINE (SCOTLAND) ACT AND PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE ASPEN OFFSHORE WIND FARM

Thank you for consulting us on the Additional Information submitted for the proposed Aspen Offshore Wind Farm. This follows on from the original Application consultation on 08 September 2025. The proposal, located approximately 84 km east of Peterhead, includes a project design envelope approach comprising up to 72 wind turbine generators, the associated infrastructure, covering an area of 333 km² and an anticipated operational life of 35 years.

The Additional Information provided by the Applicant includes updated ornithology assessments relating to:

- the extended foraging range approach for guillemot through EIA and HRA;
- new Population Viability Analysis (PVAs) undertaken for sites and species with a predicted impact of between 0.2 to 1.0 birds per annum; and
- PVAs undertaken for great black-backed gull (GBBG) at relevant SPAs.

It also includes:

- a Blue Carbon assessment, and
- clarifications on the marine mammal assessment.

We have reviewed the Additional Information submission, along with the relevant documents submitted with the original EIA Report and provide advice below.

Our advice and guidance following Application submission has been well followed and sufficient detail has been provided throughout to allow us to follow the applicant's assessment process in detail.

NatureScot advice

Guillemot extended foraging range

PVAs have been rerun using extended foraging range approach (153.7 km) for cumulative impacts under EIA and proposal alone and in-combination impacts as part of the RIAA. This has resulted in additional SPAs being screened in: Buchan Ness to Collieston Coast SPA; Fowlsheugh SPA; and Troup, Pennan and Lion's Heads SPA.

PVA Analysis for 0.2 to 1.0 bird per annum

We welcome the undertaking of PVA analysis for sites and species with a predicted impact of 0.2 to 1.0 birds per annum and provide our updated project alone and in-combination conclusions in our advice below.

Revised in-combination assessments considering other relevant projects

The Applicant has included an 'excluding consented projects committed to compensation' (ECPCC) scenario in an attempt to ensure the in-combination assessments reflect the most up-to-date predicted impacts. We highlight several discrepancies between what is presented in the Aspen Additional Information and the information as presented by other relevant projects in Appendix A. However, the figures presented in the Aspen Additional Information are more precautionary and therefore do not alter our conclusions on AEoSI. We recommend that:

- **Prior to finalisation of the Appropriate Assessment by Marine Directorate, in-combination impact figures should be corrected.**

Great black-backed gull

We welcome the inclusion of PVA analysis for GBBG at Calf of Eday SPA and Hoy SPA. While mortality from project-alone figures have only been presented to two decimal places, meaning impacts are shown as zero, we are content to conclude No AEoSI considering the minimal impact from the project, and based on the Applicant's commitment to deliver compensation for other species that may also benefit GBBG.

We hope this advice is helpful. Please contact Joe Nisbet ([Redacted]) in the first instance for any further advice, copying in our marine energy mailbox – marineenergy@nature.scot.

Yours sincerely,

Erica Knott

Head of Marine Energy – Sustainable Coasts and Seas.

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NATURESCOT ADVICE ON CERULEAN WINDS – ASPEN OFFSHORE WIND FARM

Appendix A – Marine and intertidal ornithology

In our advice dated 23 October 2025, we highlighted the following aspects should be provided as additional information, and were subsequently requested by MD-LOT:

- Guillemot regional populations and apportioning approaches to be amended based on the extended foraging range approach, as highlighted during pre-application engagement.
- PVA analysis to be undertaken for sites and species where an impact of 0.2 to 1.0 birds per annum is predicted.
- PVA analysis to be undertaken for the proposal alone and in-combination impacts to great black-backed gull (GBBG) at the Calf of Eday and Hoy SPA considering the significant decline of this feature.

In post-application consultation with the Applicant, dated 04 February 2026, we advised that in-combination inputs and cut off dates from other relevant projects should be confirmed through consultation with MD-LOT. The Applicant has sought to ensure the revised in-combination assessments reflect the most up-to-date predicted impacts, which we welcome, though note several discrepancies with the values presented (See Section A.3).

A.1 Guillemot

In our original application advice, we advised that PVAs should be rerun using the extended foraging range approach (153.7 km) for guillemot cumulative impacts under EIA, and for guillemot proposal-alone and in-combination impacts as part of the Report to Inform Appropriate Assessment (RIAA). This is due to the Proposed Development location having partial connectivity to an SPA when using the Mainland recommended foraging range (95.2 km).

The Applicant has reapportioned guillemot impacts using the extended foraging range (153.7km), in line with other far offshore projects resulting in screening in of Buchan Ness to Collieston Coast SPA, Fowlsheugh SPA, and Troup, Pennan and Lion's Heads SPA. We accept the updated information presented.

A.2 Population Viability Assessment

PVA analysis has been undertaken for sites and species where the impact per annum was between 0.2 and 1.0. We welcome the provision of this analysis, and this has resulted in revised conclusions for some features at some SPAs. Table 3 and Table 4 provide a comparison of these revised conclusions with the original application supporting information. Our updated conclusions for in-combination is provided in Section A.7 below.

A.3 Excluding consented projects committed to compensation (EPCC)

The Applicant has included an 'excluding consented projects committed to compensation' (EPCC) scenario in an attempt to ensure the in-combination assessments reflect the most up-to-date predicted impacts. This advice given is based off the EPCC scenario, as this is in-line with advice given to other recent projects.

This EPCC scenario is based on the in-combination inputs and cut-off dates submitted by Muir Mhòr, Ossian and Caledonia (08/01/2026), with the addition of impacts from Marram Wind, Buchan and Dogger Bank D alongside the Applicant's own predicted impacts derived from the

NatureScot (Guidance) approach to assessment (See Section 2.6.1 of Appendix 2). While we are content with the approach adopted, we note several discrepancies between what is presented in Table 2.10 of Appendix 2 and the in-combination values from the projects listed above. These are summarised below.

Table 1 Discrepancies between Aspen Additional Information In-combination Impact Values and the Impact Values of Relevant Projects

Project	NatureScot comments
Marram	With a few exceptions, the impacts attributed to Marram align with those presented within the Marram RIAA and subsequent NatureScot response.
Buchan	The figures presented for Buchan on the whole do not correlate with either the NatureScot Buchan response or the Buchan RIAA. The Applicant has used non-breeding mortalities rather than annual mortalities for guillemot at Troup, Pennan and Lion's Heads SPA, but it is unclear how the values for gannet and kittiwake have been derived.
Dogger Bank D	The values for kittiwake at East Caithness Cliffs SPA and Fowlsheugh SPA appear to be switched for Dogger Bank D as per the Dogger Bank D RIAA.
'All Other Impacts' (Muir Mhòr, Ossian and Caledonia)	The impacts presented within the 'All Other Impacts' column of Table 2.10 do not match the latest values as understood from the Muir Mhòr, Ossian and Caledonia figures. Despite this, the figures presented are higher than those presented by Muir Mhòr, Ossian and Caledonia and are therefore more precautionary.

The 'total impact' column does not subtract impacts from projects where consent has not been granted but where AEOsI is likely to be reached. This is what we would expect. For clarity, only sites and features where AEOsI has been concluded in the Appropriate Assessment (where the application is subsequently consented) should be removed as this reflects those projects committed to compensation.

The 'All Other impacts', and subsequently 'Total Impacts', presented in Table 2.10 are higher than those presented by Muir Mhòr, Ossian and Caledonia. We are therefore content that while incorrect, the figures presented are more precautionary and as a result our conclusions on AEOsI are unaffected.

To ensure that subsequent in-combination assessments take into consideration correct values we highlight that prior to the Appropriate Assessment being finalised the figures presented in Table 2.10 should be corrected and made publicly available on the MD-LOT portal.

A.4 Great black-backed gull

We welcome the clarification on the transcribing error between Chapter 12, Table 12.50 and Appendix 12.6, Table 3.27, and assurances that the correct values were carried through to PVA.

As great black-backed gull populations are in serious decline, we consider it important that PVAs are undertaken for this species, despite the low project-alone mortalities. Impacts to great black-backed gull in combination with other plans and projects are significant, however, project-alone impacts are, to two decimal places, zero. Although we cannot ignore the very low counterfactuals after 35 years of impact, we also recognise that the Aspen project will contribute minimally to these impacts.

While the true value of mortality from project-alone has not been presented (due to rounding to two decimal places, resulting in zero) as a pragmatic approach, we are content to conclude no AEoSI if the compensation the Applicant delivers for other species) benefits also great black-backed gulls. Mortality figures (two decimal places), PVA analysis and our conclusions on AEoSI are presented in Table 2 below.

Table 2 NatureScot conclusions on AEoSI following review of PVA undertaken as part of Additional Information submission

SPA	Mortality from project alone	Median CGR after 35 years of impact	Median CPS after 35 years of impact	NatureScot Application conclusion	NatureScot Additional Information conclusion	Population change (since Seabirds 2000)
Calf of Eday	0.00	0.996	0.873	Lack of sufficient information	No AEoSI	-91%
Copinsay	0.00	0.994	0.800	No AEoSI	No AEoSI	-93%
Hoy	0.00	0.988	0.650	Lack of sufficient information	No AEoSI	-93%

A.5 Project-alone impacts

We agree with the Applicants conclusion of **no AEoSI** from project-alone impacts and these are summarised in Table 3 **Error! Reference source not found.** below.

Table 3 Sites and features where NatureScot conclusions differed for project alone impacts between the original Application and the Additional Information Submission

SPA	Species	NatureScot Application conclusion	NatureScot Additional Information conclusion
Buchan Ness to Collieston Coast	Guillemot	Lack of sufficient information	No AEoSI
	Kittiwake	No AEoSI	No AEoSI
Calf of Eday	GBBG	Lack of sufficient information	No AEoSI
Copinsay	GBBG	No AEoSI	No AEoSI

East Caithness Cliffs	Kittiwake	No AEoSI	No AEoSI
Fair Isle	Gannet	No AEoSI	No AEoSI
Forth Islands	Kittiwake	No AEoSI	No AEoSI
	Puffin	No AEoSI	No AEoSI
Fowlsheugh	Guillemot	Lack of sufficient information	No AEoSI
	Kittiwake	No AEoSI	No AEoSI
Hoy	GBBG	Lack of sufficient information	No AEoSI
North Caithness Cliffs	Kittiwake	No AEoSI	No AEoSI
North Rona	Gannet	No AEoSI	No AEoSI
St Kilda	Gannet	No AEoSI	No AEoSI
Sule Skerry	Gannet	No AEoSI	No AEoSI
Troup, Pennan & Lion's Heads	Guillemot	Lack of sufficient information	No AEoSI
	Kittiwake	No AEoSI	No AEoSI
	Razorbill	No AEoSI	No AEoSI

A.6 'Without Berwick Bank'

As requested, the Applicant has included a 'without Berwick Bank' scenario in the in-combination assessment. Since this advice was given, Berwick Bank has been awarded a CfD for one phase of development. Advice given to other developments since this announcement has been to remove compensated-for impacts (i.e. where AEoSI or unable to conclude no AEoSI has been concluded in the AA) for consented projects.

This Additional Information reflects the above position in its 'ECPC scenario'. Based on advice to other Applicants, we have based our in-combination conclusions on this scenario though we highlight this is subject to approval by MD-LOT.

A.7 Revised RIAA conclusions

Table 4 provides our revised in-combination conclusions, in comparison to our original Application advice.

Table 4 Sites and features where NatureScot conclusions differed for in-combination impacts between the original Application and the Additional Information Submission

SPA	Species	NatureScot Application conclusion	NatureScot Additional Information conclusion
Buchan Ness to Colliston Coast	Guillemot	AEoSI	AEoSI
	Kittiwake	AEoSI	No AEoSI
Calf of Eday	GBBG	Lack of sufficient information	No AEoSI

Copinsay	GBBG	No AEoSI	No AEoSI
East Caithness Cliffs	Kittiwake	Lack of sufficient information	AEoSI
Fair Isle	Gannet	Lack of sufficient information	No AEoSI
Forth Islands	Kittiwake	Lack of sufficient information	No AEoSI
	Puffin	Unable to conclude no AEoSI	Unable to conclude no AEoSI
Fowlsheugh	Guillemot	Apportioning not as advised	AEoSI
	Kittiwake	AEoSI	AEoSI
Hoy	GBBG	Lack of sufficient information	No AEoSI
North Caithness Cliffs	Kittiwake	Lack of sufficient information	No AEoSI
North Rona	Gannet	Lack of sufficient information	No AEoSI
St Kilda	Gannet	Lack of sufficient information	No AEoSI
Sule Skerry	Gannet	Lack of sufficient information	No AEoSI
Troup, Pennan & Lion's Head	Guillemot	Apportioning not as advised	AEoSI
	Kittiwake	Lack of sufficient information	No AEoSI
	Razorbill	Lack of sufficient information	AEoSI

A.7.1 Buchan Ness to Collieston Coast SPA

SPA	Species	Mortality from project alone (low to high)	Median CGR after 35 years of impact (low to high mortality)	Median CPS after 35 years of impact (low to high mortality)	NatureScot Additional Information conclusion
Buchan Ness	Guillemot	5.54 to 15.03	0.985 - 0.969	0.579 - 0.319	AEoSI
	Kittiwake	1.18 to 1.31	0.999 - 0.998	0.956 - 0.945	No AEoSI

For **guillemot** at Buchan Ness to Collieston Coast SPA we conclude AEoSI, considering:

- The significantly low CPS values, representing a reduction in population size of 42.1 – 68.1%,
- a decrease in population growth rate of 1.5 - 3.10%,
- The stable population between Seabird 2000 and Seabirds Count,
- The favourable condition of the feature.

For **kittiwake** at Buchan Ness to Collieston Coast SPA we conclude no AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 5.5%,
- the high CGR value, representing a decrease in population growth rate of only up to 0.2%,

- 19% population decline between Seabird 2000 and Seabirds Count,
- the unfavourable condition of the feature.

A.7.2 East Caithness Cliffs SPA

SPA	Species	Mortality from project alone (low to high)	Median CGR after 35 years of impact (low to high mortality)	Median CPS after 35 years of impact (low to high mortality)	NatureScot Additional Information conclusion
ECC	Kittiwake	0.72 to 0.82	0.996 – 0.994	0.864 – 0.793	AEoSI

For **kittiwake** at East Caithness Cliffs SPA we conclude AEoSI, considering:

- the significantly low CPS value for the high displacement scenario, representing a population decrease of 20.7%,
- a decrease in population growth rate of up to 0.6%,
- 39% population decline between Seabird 2000 and Seabirds Count,
- The favourable condition of the feature.

A.7.3 Fair Isle SPA

SPA	Species	Mortality from project alone (low to high)	Median CGR after 35 years of impact (low to high mortality)	Median CPS after 35 years of impact (low to high mortality)	NatureScot Additional Information conclusion
Fair Isle	Gannet	0.40 to 0.60	0.998 – 0.997	0.946 – 0.902	No AEoSI

For **gannet** at Fair Isle SPA we conclude no AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 9.8%
- the high CGR value, representing a decrease in population growth rate of up to 0.3%
- the increasing population between Seabird 2000 and Seabirds Count and only a 3% decline following HPAI,
- The favourable condition of the feature.

A.7.4 Forth Islands SPA

SPA	Species	Mortality from project alone (low to high)	Median CGR after 35 years of impact (low to high mortality)	Median CPS after 35 years of impact (low to high mortality)	NatureScot Additional Information conclusion
Forth Islands	Kittiwake	0.21 to 0.24	0.998 – 0.997	0.942 – 0.910	No AEoSI

	Puffin	2.05 to 3.66	0.998 – 0.996	0.928 – 0.866	Unable to conclude
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For **kittiwake** at Forth Islands SPA we conclude no AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 9.0%
- the high CGR value, representing a decrease in population growth rate of up to 0.3%
- 22% population decline between Seabirds 2000 and Seabirds Count,
- The unfavourable condition of the feature.

For **puffin** at Forth Islands SPA we are unable to conclude no AEoSI, considering:

- the low CPS value for the high displacement scenario, representing a population decrease of 7.2%
- a decrease in population growth rate of up to 0.4%
- 39% population decline between Seabird 2000 and Seabirds Count, despite the favourable condition of the feature.

A.7.5 Fowlsheugh SPA

SPA	Species	Mortality from project alone (low to high)	Median CGR after 35 years of impact (low to high mortality)	Median CPS after 35 years of impact (low to high mortality)	NatureScot Additional Information conclusion
Fowlsheugh	Guillemot	10.55 to 28.62	0.992 – 0.986	0.747 – 0.598	AEoSI
	Kittiwake	1.03 to 1.14	0.997 – 0.996	0.899 – 0.862	AEoSI

For **guillemot** at Fowlsheugh SPA we conclude AEoSI, considering:

- The significantly low CPS values, representing a reduction in population size of 25.3 – 40.2%,
- a decrease in population growth rate of up to 1.4%,
- despite the stable population and the favourable condition of the feature

For **kittiwake** at Fowlsheugh SPA we conclude AEoSI, considering:

- the low CPS value for the high displacement scenario, representing a population decrease of 13.8%
- a decrease in population growth rate of up to 0.4%,
- 51% population decline between Seabird 2000 and Seabirds Count,
- The unfavourable condition of the feature.

A.7.6 North Caithness Cliffs SPA

SPA	Species	Mortality from project alone (low to high)	Median CGR after 35 years of impact	Median CPS after 35 years of impact	NatureScot Additional Information conclusion
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			(low to high mortality)	(low to high mortality)	
NCC	Kittiwake	0.44 to 0.50	0.999 – 0.998	0.949 – 0.939	No AEoSI

For **kittiwake** at North Caithness Cliffs SPA we conclude no AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 6.1%,
- the high CGR value, representing a decrease in population growth rate of up to 0.2%,
- 4% population decline between Seabird 2000 and Seabirds Count,
- The unfavourable condition of the feature.

A.7.7 North Rona and Sula Sgeir SPA

SPA	Species	Mortality from project alone (low to high)	Median CGR after 35 years of impact (low to high mortality)	Median CPS after 35 years of impact (low to high mortality)	NatureScot Additional Information conclusion
North Rona	Gannet	0.18 to 0.24	1.000 – 0.999	0.990 – 0.982	No AEoSI

For **gannet** at North Rona and Sula Sgeir SPA we conclude no AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 1.8%,
- the high CGR value, representing a decrease in population growth rate of up to 0.1%,
- the increasing population between Seabird 2000 and Seabirds Count and 23% decline following HPAI,
- The favourable condition of the feature.

A.7.8 St Kilda SPA

SPA	Species	Mortality from project alone (low to high)	Median CGR after 35 years of impact (low to high mortality)	Median CPS after 35 years of impact (low to high mortality)	NatureScot Additional Information conclusion
St Kilda	Gannet	0.65 to 0.89	1.000 – 1.000	0.999 – 0.998	No AEoSI

For **gannet** at St Kilda SPA we conclude no AEoSI, considering:

- the very high CPS values, representing only a small population decline of only up to 0.2%,
- the very high CGR value, representing a decrease in population growth rate of up to 0.1%,
- the stable population between Seabird 2000 and Seabirds Count,
- The favourable condition of the feature.

A.7.9 Sule Skerry and Sule Stack SPA

SPA	Species	Mortality from project	Median CGR after 35 years	Median CPS after 35 years	NatureScot Additional
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		alone (low to high)	of impact (low to high mortality)	of impact (low to high mortality)	Information conclusion
Sule Skerry	Gannet	0.25 to 0.33	0.998 – 0.997	0.930 -0.906	No AEoSI

For **gannet** at Sule Skerry and Sule Stack SPA we conclude no AEoSI, considering:

- the high CPS values, representing a population decline of up to 9.4%,
- a decrease in population growth rate of up to 0.3%,
- the increasing population between Seabird 2000 and Seabirds Count,
- The favourable condition of the feature.

A.7.10 Troup, Pennan and Lion's Heads SPA

SPA	Species	Mortality from project alone (low to high)	Median CGR after 35 years of impact (low to high mortality)	Median CPS after 35 years of impact (low to high mortality)	NatureScot Additional Information conclusion
Troup, Pennan & Lion's Heads	Guillemot	5.62 to 15.24	0.992 – 0.984	0.757 – 0.562	AEoSI
	Kittiwake	0.37 to 0.41	0.998 – 0.997	0.940 – 0.914	No AEoSI
	Razorbill	0.38 to 0.64	0.997 – 0.993	0.891 – 0.788	AEoSI

For **guillemot** at Troup, Pennan and Lion's Heads SPA we conclude AEoSI, considering:

- The significantly low CPS values, representing a reduction in population size of 24.3 – 43.8%,
- a decrease in population growth rate of up to 1.6%,
- 50% population decline between Seabird 2000 and Seabirds Count,
- The unfavourable condition of the feature.

For **kittiwake** at Troup, Pennan and Lion's Heads SPA we conclude no AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 8.6%
- the high CGR value, representing a decrease in population growth rate of up to 0.3%
- 44% population decline between Seabirds 2000 and Seabirds Count,
- The unfavourable condition of the feature.

For **razorbill** at Troup, Pennan and Lion's Heads SPA we conclude AEoSI, considering:

- the low CPS value, representing a population decrease of 10.9 – 21.2%
- a decrease in population growth rate of up to 0.7%,
- 9% population decline between Seabird 2000 and Seabirds Count,
- The favourable condition of the feature.

NATURESCOT ADVICE ON CERULEAN WINDS – ASPEN OFFSHORE WIND FARM

Appendix B – Blue Carbon

In the original Aspen Application, there was no consideration of impacts to Blue Carbon. We requested either rationale why a blue carbon assessment was not possible, or, alternatively, a blue carbon assessment to be presented. The Applicant has provided the latter in Appendix 1 Blue Carbon Assessment.

The assessment for Blue Carbon concludes **no significant impacts**, which we support.

We recognise that Blue Carbon assessments are a relatively new element of EIA Reports for proposed marine energy projects. Whilst advice included within this appendix is specific to the proposed Aspen Offshore Wind Farm EIA Report, there are some instances in which we provide comment on aspects of the assessment process which do not affect the outcome of the assessment or the overall conclusions reached in our advice; we hope these comments will be of benefit to future Blue Carbon assessments.

Furthermore, the biodiversity value and ecosystem functions provided by Blue Carbon habitats are well understood and afforded protection through a variety of policies. In addition, there is an increasing need to also recognise the climate change mitigation potential in line with the Blue Carbon Action Plan¹.

B.1 Study area

The study area is defined as the Proposed Development, including the Array Area and Offshore Transmission Cable (OTC), as well as a buffer of up to 10 km based on the spring tidal excursion ellipses. Intertidal habitats are also considered up to Mean High Water Springs (MHWS). This approach mirrors the study area for benthic subtidal and intertidal ecology, as per our advice. We are content with this approach.

B.2 Baseline characterisation

Table 6.1 lists the data sources used to inform the Blue Carbon assessment. All key data sources have been identified.

Additionally, our understanding is that no site-specific surveys were undertaken for Blue Carbon. Whilst we typically recommend that site-specific data is used where possible, we can accept a desk-based assessment for Blue Carbon.

B.3 Assessment approach

B.3.1 Sedimentary Blue Carbon

For sedimentary Blue Carbon, organic carbon data from Smeaton *et al.* (2021)² was overlain with the total area of disturbance within the proposed development area. As above, whilst it would have been useful to incorporate site-specific carbon values, we are content with this desk-based approach using the best available scientific information.

¹ <https://www.gov.scot/publications/scottish-blue-carbon-action-plan/>

² Smeaton, C., Hunt, C.A., Turrell, W.R. and Austin, W.E.N. (2021). Sediment type and surficial sedimentary carbon stocks across the United Kingdom's Exclusive Economic Zone and the territorial waters of the Isle of Man and the Channel Islands.

B.3.2 Impact pathways

Section 7.2.8 lists the various potential impact pathways across the different phases of development. This is a comprehensive list, including impacts such as: increased Suspended Sediment Concentrations (SSC), displacement of bottom-trawling fishing, temporary habitat disturbance, long-term habitat loss, and changes in physical processes (e.g. scour effects, etc). We welcome this thorough scoping of impacts.

B.4 Impact assessment

B.4.1 Sedimentary carbon

B.4.1.1 Temporary and permanent habitat disturbance

The proposed development has the potential to disturb up to 51,192,053 m² of marine sediments, representing a potential 36,346 tonnes of organic carbon and 133,375 tonnes of CO₂ equivalent, assuming that 100% of the organic carbon disturbed will be released as CO₂ equivalent. We agree that this magnitude is considered low due to the footprint of the proposal relative to the total seabed area, and net benefit of displaced greenhouse gas emissions across the operational lifetime.

Regarding sensitivity, we consider that the sedimentary carbon is deemed to be of high vulnerability, low recoverability and high value. This is because sediment accumulation on the seabed can be very low and recovery therefore is slow. As such, we agree that the sensitivity would be classed as high.

Overall, we agree with the conclusion of minor significance, which is not significant in EIA terms.

B.4.1.2 Reduction in access to or exclusion from established fishing grounds

Reduction in access to or exclusion from established fishing grounds is a novel impact pathway for a Blue Carbon assessment. We agree that the sequestration potential from the displacement of bottom-trawling is largely unknown and that based on the generally low sediment accumulation rates in the North Sea, although noting that this does vary spatially (Diesing *et al.*, 2021)³, any additional sequestration of carbon during the proposed development lifetime resulting from this potential pathway would likely be low.

Overall, we agree with the conclusion of negligible significance, which is not significant in EIA terms.

B.4.1.3 Changes in physical processes

We welcome the inclusion of this impact pathway, which considers the presence of infrastructure and scour/cable protection, which may introduce changes into the local hydrodynamic and wave regime, changing sediment transport pathways. Given the relatively low sediment accumulation rates in the North Sea, although noting that this does vary spatially (Diesing *et al.*, 2021), we agree with the conclusion of minor significance, which is not significant in EIA terms.

³ Diesing, M., Thorsnes, T., & Rún Bjarnadóttir, L. (2021). Organic carbon densities and accumulation rates in surface sediments of the North Sea and Skagerrak. *Biogeosciences*, 18(6), 2139–2160. <https://doi.org/10.5194/bg-18-2139-2021>

B.4.2 Blue Carbon habitats

Blue Carbon habitats identified within the wider study area include bryozoan thickets and kelp beds. The temporary increase in suspended sediment concentration (SSC) and deposition was assessed as a potential impact pathway for both habitats.

B.4.2.1 Bryozoan thickets

Bryozoans are calcifying species, storing inorganic carbon over the long-term. This form of carbon is derived from a process called calcification. This process is a net emitter of CO₂. Therefore, inorganic carbon is not considered relevant to climate change mitigation. However, bryozoan thickets can physically capture and retain organic carbon, thereby enhancing organic carbon deposition, possibly leading to eventual burial (Turrell *et al.*, 2023)⁴, noting that there is considerable uncertainty associated with this.

Temporary increase in suspended sediment concentration (SSC) and deposition was assessed as a potential impact pathway. We agree with the magnitude of low, sensitivity of medium and overall significance of minor for bryozoan thickets, which is not significant in EIA terms.

B.4.2.2 Kelp beds

As well as being afforded protection through their PMF status, kelp beds are also considered a Blue Carbon habitat. Kelps are very productive and can sequester large amounts of CO₂. They attach to rocks and other substrates using holdfasts, and as such, they do not have root systems and do not transfer carbon to underlying sediments. Kelps in particular have a fast turnover rate and decompose easily; however, due to their large volumes, a proportion of their biomass can become buried in seabed sediments for longer timescales.

Temporary increase in suspended sediment concentration (SSC) and deposition was assessed as a potential impact pathway. We agree with the magnitude of low, sensitivity of low and overall significance of minor for kelp beds, which is not significant in EIA terms.

B.5 Cumulative assessment

The Blue Carbon cumulative assessment mirrors that presented for Benthic Ecology, such that there are no likely cumulative effects predicted for any phase of the proposed development, based on the 10 km study area. We are content with this conclusion.

B.6 Mitigation and monitoring

No specific mitigation or monitoring for Blue Carbon is proposed, which is in line with the overall conclusion of not significant in EIA terms.

⁴ Turrell, W.R., Austin, W.E.N., Philbrick, S.P., Tilbrook, C. and Kennedy, H., (2023). Clarifying the role of inorganic carbon in blue carbon policy and practice. *Marine Policy*, 157, p.105873.

NATURESCOT ADVICE ON CERULEAN WINDS – ASPEN OFFSHORE WIND FARM

Appendix C Marine Mammals

Clarifications for the following aspects of the marine mammal assessment have been presented in the Additional Information submission:

- Clarification on how the impact range for suction anchor installation was calculated, due to the high Permanent Threshold Shift (“PTS”) impact to harbour porpoise.
- Clarification on the percentage of the population, of each marine mammal species assessed, impacted by piling disturbance using the UK portion of the Management Units.
- Clarification on how species densities were derived for the marine mammal cumulative assessment.
- Clarification on the number of proposed piling days assessed due to discrepancy noted between the EIA, and Interim Population Consequences of Disturbance Model (“iPCoD”) modelling.

We are content that the information presented addresses the above requests for clarification and do not change our conclusions and advice provided at the Application stage.

Northern Lighthouse Board

From: [Adam Lewis](#) on behalf of [navigation](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Anna Shenton](#); [Ben Walker](#)
Subject: RE: [EXT] MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 16 March 2026 09:56:15
Attachments: [image001.png](#)

Good morning,

NLB have no comment to provide on the additional information provided with regard to the Aspen Offshore Wind Farm S36 and ML applications.

The NLB response to the original application remains unchanged.

Regards

Adam

Adam Lewis

Coastal Inspector

Northern Lighthouse Board

T: [Redacted]

M: [Redacted]

E: [Redacted]

Northlink Ferries

From: [Stuart McCallum](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Anna Shenton](#); [Ben Walker](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 30 April 2026 09:32:40
Attachments: [image001.png](#)

Good morning Amy,

Sorry if this was missed, 84km East of Peterhead would present no concerns to us, we would only ever be between 5 – 15 nm off Peterhead, so no objections.

Best regards,

Capt. Stuart McCallum
Marine Manager
DPA & CSO

T: [Redacted]
M: [Redacted]
E: [Redacted]
[Redacted]
W: www.northlinkferries.co.uk

Serco NorthLink Ferries
Jamieson Quay
Aberdeen, AB11 5NP

Peterhead Fishery Office

From: [William Harris](#) on behalf of [FO Peterhead](#)
To: [MD Marine Renewables](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 29 April 2026 17:15:53
Attachments: [image001.png](#)

Good afternoon Amy,
Yes, a nil return from us.
Thanks,
Billy

William A. Harris
Senior Operations Officer
Operations - Marine Directorate

**In the service
of Scotland**



Scottish Government, Area Office, Caley Buildings, 28-32 Harbour Street Peterhead. AB42 1DN

[Redacted]

[Redacted]

W: www.scotland.gov.uk/marinescotland

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Royal Yachting
Association
Scotland

From: [Pauline McGrow](#)
To: [MD Marine Renewables](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 16 March 2026 09:24:16
Attachments: [image002.png](#)
[image003.png](#)

Hi Amy,

I write to inform you that RYA Scotland has no comment that they wish to make on this application.

Kind Regards

Pauline

Pauline McGrow
Business Support Lead

Royal Yachting Association Scotland

T: [Redacted]

E: [Redacted]



Protecting your personal information is important to us, view our full Privacy Statement [here](#)

**Scottish
Environment
Protection Agency**

From: [Planning.North](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#)
Subject: PCS-20008296 SEPA Response to MS-00011409 / MS-00011410
Date: 25 March 2026 14:22:22
Attachments: [image.png](#)

To Whom It May Concern,

Marine (Scotland) Act 2010

MS-00011409 / MS-00011410

Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA

Section 36 consent and Marine Licence Applications

Aspen Offshore Wind Farm – Approximately 84km east of Peterhead

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,
Aden McCorkell
Senior Planning Officer



For the future of our environment

Disclaimer

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email to postmaster@sepa.org.uk. Registered office: SEPA, Angus Smith Building, 6 Parklands Avenue, Eurocentral, Holytown, North Lanarkshire, ML1 4WQ. Communications with SEPA may be monitored or recorded or released in order to secure the effective operation of the system and for other lawful purposes.

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. Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhruid 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: OB MS-00011410 and MS-00011409 Aspen OWF EIA/0025/002

Your Ref: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation

28th April 2026

Amy Woodward
Marine Directorate – Licensing Operations Team
Scottish Government
E-mail: MD.MarineRenewables@gov.scot

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www.sff.co.uk

SFF Response to MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation

The Scottish Fishermen's Federation (SFF) has reviewed the Additional Information submitted by Cerulean Winds Aspen Project Limited, including the Addendum and its supporting appendices.

This response should be read as a continuation of, and does not supersede, the Scottish Fishermen's Federation's statutory representation dated 13th November 2025. The matters raised in that response remain outstanding and no additional evidence submitted to date materially alters the Federation's position. As with our original representation, the SFF has confined its review to matters relevant to commercial fisheries, seabed use, spatial access, cumulative impacts and socio economic consequences for fishing businesses and communities.

1. Procedural Scope of the Additional Information

The Addendum confirms that it was prepared solely in response to the Marine Directorate – Licensing Operations Team (MD-LOT) request for additional information dated 15th December 2025, based primarily on NatureScot's representation. The Applicant explicitly frames:

- Blue Carbon and Ornithology as the only statutory "Additional Information" and
- all other matters (including fisheries relevant socio economic issues) as clarifications rather than reassessment.

This framing is important. It confirms that no new environmental assessment has been undertaken for commercial fisheries, fisheries displacement, cumulative spatial squeeze or fishing community impacts. The matters raised by SFF in our original representation therefore remain within the scope of determination and have not been substantively revisited.

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

2. Blue Carbon Assessment

Recognition of Fisheries Displacement

Appendix 1 (Blue Carbon Assessment) explicitly recognises commercial fishing displacement as an impact pathway across construction, operation, maintenance and decommissioning phases. The Applicant states that:

- commercial fishing is unlikely to resume within the Aspen Array Area during operation and maintenance and
- the presence of floating foundations, anchors and moorings renders fishing “not practically feasible”.

This is a clear acknowledgment of functional, long-term exclusion, not merely temporary disruption. The SFF notes that this directly aligns with concerns raised in our original response regarding loss of access to established grounds and displacement of fishing effort.

Selective Treatment of Displacement Effects

While displacement is identified, the assessment treats its consequences narrowly and selectively:

- Disturbance caused by bottom contact fishing activity is described as harmful to sedimentary carbon stores, with penetration depths of up to 16 cm and depletion of organic carbon pools.
- Conversely, the displacement of fishing caused by the wind farm is treated as potentially neutral or beneficial, on the assumption that reduced activity within the development footprint may allow local sediment accumulation.

However, the assessment does not consider:

- where displaced fishing effort relocates
- whether receiving grounds have higher carbon density, greater sensitivity, or existing cumulative pressure
- whether effort displacement results in net increases in seabed disturbance elsewhere.

This one directional logic applies system boundaries selectively and is not supported by quantitative evidence.

Admitted Data Gaps and Unsupported Conclusions

The Applicant acknowledges that:

- sequestration gains from reduced fishing activity cannot be quantified
- sediment accumulation rates in offshore North Sea environments are low and spatially variable
- data drawn from fjord environments are not directly transferable offshore
- the frequency and intensity of fishing activity within the study area is unknown.

Despite these admissions, the assessment concludes that displacement related impacts on carbon stores are negligible. From an SFF perspective, this conclusion is assumption led rather than evidence led. The absence of data is used to discount impact, rather than to trigger a precautionary approach. These same uncertainties underpin SFF’s concerns about fisheries displacement, spatial squeeze and cumulative seabed pressure.

Long Term Seabed Interaction from Floating Infrastructure

The Blue Carbon Assessment also confirms:

- anchors penetrating up to ~40 m below seabed
- repeated seabed disturbance from mooring movement (“strimming effects”)
- repeated disturbance associated with cable protection, inspection and repair over the operational life.

However, the assessment considers only the top 10 cm of sediment, acknowledges that carbon impacts at depth are unknown, and yet proceeds to reach confidence conclusions regarding magnitude and significance.

The SFF notes that this mirrors longstanding concerns regarding the under representation of long term, repeated seabed disturbance associated with floating infrastructure impacts which are directly relevant both to fisheries viability and seabed condition.

3. Commercial Fisheries Assessment – No Change in Evidence Base

The SFF notes that the Additional Information does not revisit or update Volume 2, Chapter 13 (Commercial Fisheries). In particular:

- no new quantification of fisheries displacement is provided
- no reassessment of cumulative spatial pressure is undertaken
- no fleet-specific economic impacts are revisited and
- no additional mitigation or compensation mechanisms are proposed

In particular, the findings of moderate adverse significance for fisheries displacement, access restriction, and cumulative spatial squeeze identified in Volume 2, Chapter 13 of the EIAR remain unchanged and unmitigated. No new evidence has been submitted that alters those findings or the conclusions previously reached by the SFF.

4. Socio Economic and Community Impacts – Explicitly Unresolved

The Addendum confirms that:

- no socio-cultural impact assessment has been undertaken
- no shortlist of potential operation and maintenance ports has been provided
- these matters are considered premature and deferred to post consent stages.

This position confirms that cumulative socio-economic impacts on fishing communities cannot be meaningfully assessed at determination stage, despite being raised by consultees. From an SFF perspective, this is a material gap, given the scale of spatial exclusion proposed and the concentration of fishing activity along the east coast.

5. Matters Not Addressed by the Additional Information

For clarity, the Additional Information does not revisit or resolve:

- the magnitude and duration of fisheries displacement
- cumulative spatial squeeze across the east coast
- viability of fishing within floating wind arrays
- long term gear conflict risks from moorings and dynamic cables
- adequacy of proposed mitigation or adaptation measures for commercial fisheries
- long-term compensation arrangements or governance structures for cumulative fisheries impacts.

This is a factual statement based on the content of the submission.

6. SFF Position

Having reviewed the Additional Information in full, the Scottish Fishermen's Federation concludes that:

- while new assessment has been undertaken for blue carbon and ornithology, the additional information does not materially improve the evidence base relating to commercial fisheries
- fisheries displacement is acknowledged but not quantified or assessed on a cumulative basis
- long term seabed interaction from floating infrastructure remains under characterised
- socio economic impacts on fishing communities remain unassessed.

The matters raised by the SFF in its original representation therefore remain outstanding and the evidence submitted does not justify a change in the Federation's position.

For and on behalf of the Scottish Fishermen's Federation

[Redacted]

Oliwia Biros

Offshore Consents Assessments Manager

Scottish Fishermen's Federation

Scottish Water

Wednesday, 25 March 2026



Marine Licensing
375 Victoria Road

Aberdeen

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

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk



Dear Customer,

**cerulean Winds Aspen, Offshore Wind Farm 84km east of, Peterhead,
AB43 9DA
Planning Ref: MS-00011410 and MS-00011409
Our Ref: DSCAS-0151898-VVN
Proposal: EIA Section 36 consent and Marine Licence Applications**

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

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

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at

<https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and-Developers/Connecting-to-Our-Network> which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

Next Steps:

All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals

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

Yours sincerely,

Ruth Kerr

Development Services Analyst
PlanningConsultations@scottishwater.co.uk

Scottish Water Disclaimer:

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

Supplementary Guidance

- Scottish Water asset plans can be obtained from our appointed asset plan providers:
 - Site Investigation Services (UK) Ltd
 - Tel: 0333 123 1223
 - Email: sw@sisplan.co.uk
 - www.sisplan.co.uk
- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for

checking the water pressure in the area, then they should write to the Development Operations department at the above address.

- If a connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.
- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or a Sustainable Drainage System (SUDS) proposed to vest in Scottish Water is constructed.
- Please find information on how to submit application to Scottish Water at our Customer Portal.

Shell

From: [Redacted]
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Anna Shenton](#); [Ben Walker](#)
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 30 April 2026 09:36:47
Attachments: [image001.png](#)

Hi Amy,

That's correct. No response from us. Thanks.

Best,
Aled

Transport Scotland

From: [Iain Clement](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [LOGAN Lesley](#); [DEVENNY Alan](#); [Andrew Erskine](#)
Subject: EIA - A90 – Aspen Offshore Wind Farm – Section 36 Consent and Marine Licence Applications - Additional Information - TS Consultation Response - 14-Apr-26
Date: 14 April 2026 08:54:20
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

FAO Amy Woodward

Morning Amy,

Thank you for the opportunity for Transport Scotland to comment on the Additional Information (AI) submitted in support of the Aspen Offshore Wind Farm, located approximately 84km east of Peterhead. I note that this comprises the following:

- Blue Carbon
- Ornithology
- Marine Mammals
- Turbot Bank nature conservation Marine Protected Area
- Socio-cultural and socio-economic impacts

As indicated in our response dated 20th March 2025, Transport Scotland has no comment to make on the Offshore elements of the project. I can confirm, therefore, that we have no comment to make on the Additional Information.

Kind regards,

Iain

Development Management
Roads Delivery & Operations
transport.gov.scot

Transport Scotland, 177 Bothwell Street, Blythswood New Town, Glasgow, G2 7ER



Transport Scotland, the national transport agency
Còmhdhail Alba, buidheann nàiseanta na còmhdhail

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**Ugie District
Salmon Fishery
Board**

From: [Ugie Salmon](#)
To: [MD Marine Renewables](#); [Amy Woodward](#)
Subject: FW: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited - Aspen Offshore Wind Farm - EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation - Response Required by 28 April 2026
Date: 30 April 2026 09:08:00
Attachments: [image001.png](#)

From: [Redacted]
Sent: 30 April 2026 08:38
To: [Redacted]
Subject: RE: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited - Aspen Offshore Wind Farm - EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation - Response Required by 28 April 2026

Hello Amy

We have had so many (you should know) of these applications it is difficult to keep up with them all. Initially we responded to these applications with a standard question, will the salmon and seatrout populations be adversely affected by this project in the construction stage and in the operating stage. These concerns are still live with the Board members and have not been addressed fully by the applicant. The unseemly haste that these projects are being rushed through is a major concern to us.

Kind Regards
Joseph Yule (Convener)
Ugie District Salmon Fishery Board
Peterhead
Tel [Redacted]
Mob [Redacted]
E mail [Redacted]

**Ythan District
Salmon Fishery
Board**

From: [Mark Andrew](#)
To: [MD Marine Renewables](#)
Cc: [Amy Woodward](#); [Anna Shenton](#); [Ben Walker](#)
Subject: Re: MS-00011410 and MS-00011409 - Cerulean Winds Aspen Project Limited – Aspen Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Additional Information Consultation – Response Required by 28 April 2026
Date: 30 April 2026 11:40:52
Attachments: [image001.png](#)

Dear Amy,

Thanks for the reminder and apologies for the delay in responding.

The River Ythan could be affected by this proposal in that the cable route crosses the offshore estuarial waters and could affect both sea trout and salmon (for which the Ythan District Fishery Board has responsibility).

It could also affect the large and growing seal population which are hauled out on the north side of the Ythan estuary but which feed off the adjacent water. Seals are not within the remit of the Board and no doubt others will comment on any potential impact.

We would ask that the developers are required to time the installation of the cables across the estuarial waters so as to avoid impacting departing salmonid smoults (May) and coastal sea trout that swim between the estuaries of the Dee, Don and Ythan but which tend to congregate in the Ythan from June to August.

[Redacted]

Kind regards
Mark

M H T Andrew