

Buchan Offshore Wind

Chapter 1: Introduction

Offshore AEIR



BUC-C-R-021

Buchan Offshore Wind

Additional Environmental Information Report

Chapter 1 Introduction

QMS Review

Name	Company	Date	Reviewed	Approved
ELE	Natural Power	26/05/2026	LJN	SMM
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1.1 INTRODUCTION

1.1.1 Project Overview

- 1-1 The proposed Buchan Offshore Wind Farm (hereinafter referred to as the Proposed Offshore Development) is a floating offshore wind development located within the Option Area within the ScotWind North East Area 8 (NE8) Plan Option, as identified in the Sectoral Marine Plan for Offshore Wind Energy.
- 1-2 Buchan Offshore Wind Limited (hereinafter referred to as the Applicant) was awarded development rights for the Option Area through an Agreement for Lease with Crown Estate Scotland as part of the ScotWind leasing process. The Option Area covers approximately 330 km² and has the potential to accommodate an anticipated 1 GW of offshore wind generating capacity.
- 1-3 It is the Applicant's intention to develop a floating offshore windfarm in the Option Area (NE8), along with associated infrastructure for the transmission of electricity back to shore for onward connection into the National Grid. The Proposed Offshore Development will contain the Offshore Generation Infrastructure (OGI) including Wind Turbine Generators (WTGs), along with the associated Offshore Transmission Infrastructure (OTI) to landfall, seaward up to Mean High Water Springs (MHWS). Further details of the Proposed Offshore Development and associated infrastructure are provided in Volume 1, Chapter 4: Project Description of the Environmental Impact Assessment Report (EIAR).
- 1-4 Once the required transmission infrastructure reaches the shore and enters the terrestrial environment, landward of Mean Low Water Springs (MLWS), it is referred to as the Proposed Onshore Development. The Proposed Onshore Development is subject to a separate assessment and application process under the Town and Country Planning (Scotland) Act 1997. The intertidal area between MHWS and MLWS is considered by both applications.

1.1.2 Application Overview

- 1-5 The Application for the Proposed Offshore Development (the Application), submitted to Marine Directorate – Licensing Operations Team (MD-LOT) in July 2025, is supported by an EIAR, which was prepared in accordance with the relevant Environmental Impact Assessment Regulations (as set out in Volume 1, Chapter 2: Legislation and Policy for the EIAR) and informed by consultation with statutory and non-statutory stakeholders. The EIAR assesses the likely significant environmental effects of the Proposed Offshore Development and provides the basis for determination of the Application.
- 1-6 Following review of the Application and consultation representations of the Application, MD-LOT issued a Request for Additional Environmental Information (RAEI) to the Applicant on 18 December 2025, informed by consultation responses from NatureScot and Marine Directorate – Science, Evidence, Data and Digital (MD-SEDD). The RAEI requests further information to support MD-LOT in reaching a conclusion on the significance of effects of the Proposed Offshore Development and to inform the decision on whether to grant consent. This request is pursuant to regulation 21 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, regulation 19 of the Electricity Works (Environmental Impact Assessment) (Scotland)

Regulations 2017 and regulation 14 of the Marine Works (Environmental Impact Assessment) Regulations 2007.

1-7 Terms defined in the EIAR Glossary have the same meanings in this Additional Environmental Information Report, unless stated otherwise.

1.1.3 Purpose of the Additional Environmental Information Report (AEIR)

1-8 This Additional Environmental Information Report (AEIR) has been prepared in response to the RAEI received from MD-LOT on 18 December 2025 in relation to the determination of the Application for the Proposed Offshore Development made in July 2025.

1-9 The RAEI seeks clarification on specific aspects of the EIAR, includes comments on elements of the assessment approach and models, and requests targeted additional information in relation to certain technical topics.

1-10 The Applicant's approach to the AEIR is to provide a targeted and proportionate response to the matters raised, drawing on and, where necessary supplementing the existing EIAR. Responses to the RAEI have therefore been structured to:

- clarify, verify and expand upon the existing assessment where appropriate; and
- provide additional supporting information or detail in assessment where required.

1-11 This report also explains the context for the AEIR and sets out the structure of the accompanying documents, including the chapters for technical topics and associated appendices.

1.2 REGULATORY CONTEXT

1.2.1 Environmental Impact Assessment Framework

1-12 Environmental Impact Assessment (EIA) is a process used to identify, assess and present the likely significant environmental effects of a proposed development. The EIAR supporting the Application was prepared in accordance with the requirements of the EIA Regulations and provides information to enable consultees and the competent authority to understand the Proposed Offshore Development, its likely significant environmental effects, and the measures proposed to avoid or reduce adverse effects.

1-13 The AEIR should be read alongside the submitted EIAR and is supplementary to it. The legislative and policy context underpinning the EIA, including relevant international, UK and Scottish policy frameworks, marine planning context, consenting regime, and environmental legislation, is set out in Volume 2, Chapter 2: Legislation and Policy of the EIAR.

1.3 CONSULTATION AND REQUESTS FOR FURTHER INFORMATION

1.3.1 Consultation Summary

1-14 Following submission of the Application and EIAR, statutory consultees were consulted by MD-LOT in accordance with the relevant legislative and procedural requirements. Further details of

the consultation process are provided in Volume 1, Chapter 2 Legislation and Policy, Section 2.7.6.

- 1-15 Representations were received from a range of statutory consultees and stakeholders, including NatureScot, MD-SEDD, the Scottish Fishermen’s Federation (SFF), Fisheries Management Scotland (FMS), the Maritime and Coastguard Agency (MCA), the Ministry of Defence (MOD), National Air Traffic Services (NATS), and other technical and regulatory bodies. The issues raised include ecological effects (ornithology, marine mammals and fish), commercial fisheries interactions, navigational safety, aviation and radar considerations, socio-economics, and potential interactions with existing infrastructure.
- 1-16 The Applicant would like to express thanks to all consultees and stakeholders who have taken the time to review and provide feedback on the Application. The Applicant has responded directly to all consultees that provided representations in response to the Application in order to provide clarification on issues raised.
- 1-17 A summary of representations received on the Application and subsequent Applicant response is provided in **Table 1-1**.

Table 1-1 : Summary of Consultation Responses and Applicant Responses

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
Aberdeen Airport	08 September 2025	13 April 2026	Aberdeen Airport confirmed that the Proposed Offshore Development lies outwith their consultation area, and therefore no comments are made and no further consultation is required.	The Applicant acknowledged Aberdeen Airport’s response confirming that the Proposed Offshore Development lies outside the airport safeguarding area and that no aviation impacts requiring further assessment were identified. No further action was considered necessary in relation to Aberdeen Airport safeguarding.
Aberdeen City Council	01 October 2025	13 April 2026	Aberdeen City Council confirmed that the Proposed Offshore Development lies outwith the administrative boundary of the city, and that no associated land or marine infrastructure is proposed within their area. On this basis, the Council confirmed that they have no comments to make in response to the consultation.	The Applicant acknowledged receipt of Aberdeen City Council’s consultation response and thanked them for their feedback. The Applicant welcomed further engagement, where necessary, as the project progresses through determination.
Aberdeenshire Council	25 September 2025	13 April 2026	Aberdeenshire Council confirmed that they have no comments in relation to the Proposed Offshore Development, noting the distance between the development and the Aberdeenshire coastline. The Council highlighted that elements of the Proposed Onshore Development, including the landfall, have been subject to pre-application discussions and will be considered separately through a future planning application.	The Applicant acknowledged receipt of Aberdeenshire Council’s consultation response, thanked them for their feedback, and confirmed that the comments have been noted. The Applicant welcomed further engagement, where necessary, as the project progresses through determination.

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
BT (Radio Network Protection)	19 September 2025	13 April 2026	BT reviewed the Proposed Offshore Development in relation to electromagnetic compatibility (EMC) and potential impacts on point-to-point microwave radio links. BT confirmed that the proposed layout is unlikely to cause interference to existing and planned radio networks. However, they specified a requirement for a minimum 100 metre clearance from radio link paths, and noted that the assessment reflects current spectrum use, which may change. BT requested that they are reconsulted if there are any changes to turbine locations, heights or layout, as new radio links may be assigned over time.	The Applicant acknowledged receipt of BT's consultation response, thanked them for their feedback, and confirmed that the comments have been noted. The Applicant welcomed further engagement, where necessary, as the project progresses through determination.
Department of Agriculture, Environment and Rural Affairs (DEFRA)	NO DATE	13 April 2026	DEFRA provided a split response. The Sea Fisheries Inspectorate raised concerns regarding potential impacts on Northern Ireland fishing vessels, noting catch activity within relevant International Council for the Exploration of the Sea (ICES) rectangles. The Marine Licensing Branch confirmed that they have no comment at this stage, advising that projects are considered on a case-by-case basis.	The Applicant acknowledged receipt of DEFRA's consultation response, thanked them for their feedback, and confirmed that the comments have been noted. The Applicant welcomed further engagement, where necessary, as the project progresses through determination.
Edinburgh Airport	26 August 2025	13 April 2026	Edinburgh Airport confirmed that the Proposed Offshore Development lies outwith their Aerodrome Safeguarding Zone, and therefore no objection or	The Applicant acknowledged receipt of Edinburgh Airport's consultation response and thanked them for their feedback. The Applicant welcomed further engagement, where necessary,

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
			comment is raised in relation to the Application.	as the project progresses through determination.
Fisheries Management Scotland	07 October 2025	20 May 2026	Fisheries Management Scotland raised a formal objection to the Proposed Offshore Development due to concerns regarding potential impacts on diadromous fish, including Atlantic salmon and sea trout. Key issues included significant uncertainty in the evidence base, and disagreement with the conclusion of no significant effects. FMS highlighted the need for a precautionary approach, particularly given declining salmon populations, and raised concerns regarding cumulative impacts, electromagnetic fields (EMF) from cables, behavioural effects, and predator aggregation around offshore structures. Further concerns were raised regarding incomplete assessment of SAC rivers, limitations in baseline data, and insufficient consideration of migratory pathways. FMS emphasised the need for strategic monitoring and research, including pre-construction baseline data collection, and requested that developers contribute to addressing evidence gaps through ScotMER and other initiatives.	The Applicant acknowledged receipt of Fisheries Management Scotland consultation response and thanked them for their feedback. The Applicant confirmed that the re-classification of Atlantic salmon would be considered in future development of management plans for the Proposed Offshore Development alongside monitoring strategies and mitigation more generally as part of these plans. The Applicant also provided clarification on the Study Area for the fish and shellfish chapter including confirmation of the River Tay in assessment, The Applicant confirmed consideration being given to any evidence gaps under ScotMER in relation to diadromous fish and whether they can contribute to the filling of these. Clarification was also provided in relation to EMF and visual stimuli (i.e. shadow flicker) and the behaviour of wild salmonids and how this was assessed as part of the EIA and the RIAA respectively with confirmation that the conclusions presented in assessment remain valid. The Applicant confirmed that further consultation with FMS would be undertaken towards the

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
				development of a Fish Management Plan to support the Proposed Offshore Development.
Historic Environment Scotland	15 September 2025	13 April 2026	Historic Environment Scotland reviewed the EIAR and confirmed that no significant impacts on historic environment assets are anticipated from the Proposed Offshore Development. They noted that impacts on designated assets had been appropriately scoped out and that there would be no physical impacts within their remit. A minor observation was made regarding inaccuracies in supporting documentation, although this was not considered to affect the overall conclusions of the assessment.	The Applicant acknowledged receipt of Historic Environment Scotland's consultation response, thanked them for their feedback, and confirmed that the comments have been noted. The Applicant welcomed further engagement, where necessary, as the project progresses through determination.
Joint Radio Company	19 September 2025	13 April 2026	The Joint Radio Company confirmed that the Proposed Offshore Development is unlikely to cause interference to existing radio infrastructure. They advised that no objection is raised, subject to there being no impact on radio link paths. It was noted that re-consultation may be required should there be any changes to the proposed layout, height or location of structures that could affect telecommunications links.	The Applicant acknowledged receipt of the Joint Radio Company's consultation response, thanked them for their feedback, and confirmed that the comments have been noted. The Applicant welcomed further engagement, where necessary, as the project progresses through determination.
Marine Directorate – Marine Analytical Unit (MAU)	Undated	7 May 2026	The Marine Analytical Unit provided technical advice on the socio-economic assessment. Overall, the assessment was considered to be of a satisfactory standard, with positive effects identified in relation	The Applicant acknowledged receipt of MAUs consultation response and thanked them for their feedback. The Applicant provided clarification on the approach for assessment of the socio-

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
			<p>to employment and Gross Value Added (GVA). However, MAU recommended improvements to the clarity and specificity of the assessment, including refining the list of potential ports and providing greater detail on anticipated social impacts. MAU also noted limited detail on engagement with local communities and stakeholders, and highlighted uncertainty regarding how future engagement would be undertaken once project details are confirmed.</p>	<p>economic impact on ports. The Applicant confirms that the approach taken is in line with the principles of the Maximum Design Scenario approach to EIA and given the final port selection will be subject to ongoing commercial negotiations, infrastructure capability and CfD, all 15 port locations included in assessment have the potential to be used. In absence of a confirmed port the Maximum Design Scenario approach was used by evaluating the minimum and maximum boundaries to ensure that whichever port is selected, the impacts will fall within the boundaries assessed. The Applicant confirms that the multi-port approach is standard industry practice for similar projects including Ossian and Muir Mhor. The Applicant commits to engage with organisations and members of the public local to the ports being considered as the list of ports is refined.</p>
MD-SEDD	30 September 2025	7 May 2026	<p>MD-SEDD provided detailed technical advice across physical processes and commercial fisheries. For physical processes, MD-SEDD raised concerns regarding the assessment of water column stratification, including lack of consideration of interannual variability, potential interaction of floating</p>	<p>The Applicant has provided a detailed response to MD-SEDDs matters raised in relation to physical processes as part of the AEIR Chapter 2: Marine and Coastal Physical Processes. A copy of the responses to MD-SEDD against matters raised is provided as an appendix to the AEIR chapter.</p>

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
			<p>foundations with the thermocline, and the dynamic behaviour of the Buchan and East Orkney fronts. They also noted limitations in the qualitative assessment approach, particularly for cumulative effects, and requested further clarification and potential post-consent monitoring. For commercial fisheries, MD-SEDD agreed with the overall conclusion of no significant effects but provided recommendations regarding cable protection methods, management of snagging risks, and the need to share infrastructure data with the fishing industry and relevant bodies.</p>	<p>In relation to points made on commercial fisheries, the Applicant acknowledges the matters raised by MD-SEDD and will continue to consult with the fishing industry prior to discharging requirements. The Applicant also notes that the promulgation of information is a key element of embedded mitigation across all shipping and navigation interactions, inclusive of fisheries.</p> <p>A workshop was held with MD-SEDD to discuss the matters raised on 8th April 2026.</p>
MCA	12 September 2025	13 April 2026	<p>The MCA reviewed the Navigational Risk Assessment (NRA) and confirmed that it is generally acceptable and proportionate, including vessel traffic surveys and cumulative assessment. The MCA provided detailed technical comments in relation to navigational safety, Search and Rescue (SAR), layout design, marking and lighting, cable installation, mooring arrangements, hydrographic surveys, and post-construction monitoring. The MCA highlighted requirements for further agreement on post-consent plans and mitigation measures, including Emergency Response Co-operation Plan (ERCoP), Navigation Safety Plan and Cable Plan. The</p>	<p>The Applicant acknowledged the MCA's comments and confirmed that requirements will be addressed through final design and post-consent plans, including completion of SAR documentation (including the provision of the ERCoP), agreement of layout, lighting and marking, and provision of monitoring and survey data. Commitments were made to engage with the MCA and NLB on potential options for wet storage, to finalise mitigation measures and ensure compliance with guidance and licence conditions. The Applicant confirms that a reduction of over 5% water depth will</p>

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
			response concluded with a cautious acceptance of the Application, subject to conditions and further discussion.	not be exceeded in the Array Area or in installation of cable protection. In addition, the Applicant confirmed that any future hydrographic surveys will comply with IHO order 1a and any final data sets will be provided to the MCA and that a post-construction monitoring report will be submitted to MCA and NLB at the end of each year of monitoring (3 years total)
Ministry of Defence (MOD)	14 October 2025	Ongoing	The MOD raised a formal objection to the Proposed Offshore Development due to unacceptable impacts on air defence radar systems, specifically the Remote Radar Head (RRH) Buchan. The MOD advised that the proposed turbines would cause interference with radar capability, including reduced detection performance and false returns, thereby affecting the UK's air defence capability. Additional concerns were raised regarding physical obstruction to low flying aircraft within Low Flying Area 14, and requirements for aviation lighting and charting. While no concerns were identified in relation to air traffic control radar or offshore cables, the MOD noted that no suitable mitigation has been proposed to address radar impacts, although they welcomed further engagement on potential solutions.	Ongoing engagement is being undertaken with the MOD to identify and progress potential mitigation solutions.

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
	September 2025	Ongoing	Through consultation, the MOD requested additional technical information to support its assessment, including array and export cable coordinates, landfall location, and maximum generation capacity.	The requested information was provided to MD-LOT for onward transmission to the MOD.
	Ongoing (2023–2026)	Ongoing	Ongoing engagement has been undertaken with the MOD to identify potential mitigation solutions for radar impacts, including consideration of a Non-Automatic Initiation Zone (NAIZ) and potential strategic mitigation through the Project Njord programme.	Engagement is ongoing, including provision of technical information and exploration of mitigation options in consultation with the MOD.
National Air Traffic Services (NATS)	28 August 2025	Ongoing	NATS raised a formal objection to the Proposed Offshore Development on the basis that it conflicts with safeguarding criteria relating to aviation infrastructure. NATS advised that preliminary technical assessment identified potential impacts on air traffic operations. It was noted that a further operational assessment would be undertaken, and that the objection may be withdrawn only if this demonstrates that impacts are acceptable. NATS also highlighted the legal requirement for consultation and the importance of considering their advice to avoid risks to aviation safety.	Engagement with NATS is ongoing to progress mitigation measures.
	Pre-application / October 2024 onwards	Ongoing	Through pre-application engagement, NATS identified a potential mitigation solution comprising radar blanking and the implementation of a Transponder	The Applicant is progressing this mitigation solution with NATS, including discussions to move towards a contracted agreement.

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
			Mandatory Zone (TMZ), which was confirmed as acceptable in principle.	
	Ongoing (2025–2026)	Ongoing	Ongoing engagement has been undertaken with NATS to progress mitigation, including agreement in principle that blanking and TMZ would mitigate impacts to Allanshill radar. Further steps include contractual agreement and regulatory approval (including Civil Aviation Authority approval for TMZ), following which the objection may be withdrawn.	Engagement is ongoing, including technical discussions and progression of contractual and regulatory steps required to implement mitigation.
Natural England	26 August 2025	13 April 2026	Natural England advised that the Proposed Offshore Development is outside their primary jurisdiction, and that NatureScot should lead on advice for offshore Scottish waters. However, they provided limited technical input in relation to English designated sites and species. Natural England agreed with the conclusions of the Habitats Regulations Assessment, noting no adverse effects on the integrity of English SPAs and SACs, subject to mitigation being secured. Additional advice was provided in relation to future updates to marine mammal deterrent ranges and deferral to NatureScot on the Entanglement Management Plan.	The Applicant acknowledged receipt of Natural England’s consultation response, confirmed that the feedback has been noted, and welcomed further engagement, where necessary, as the project progresses through determination.
Natural Resources Wales	21 August 2025	13 April 2026	Natural Resources Wales confirmed that they would not be providing a substantive response to the consultation and advised that they defer to NatureScot for	The Applicant acknowledged receipt of Natural Resources Wales’ response, thanked them for their input, and confirmed that the feedback has been

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
			consideration of the Proposed Offshore Development.	noted. The Applicant welcomed further engagement, where necessary, as the project progresses through determination.
NatureScot	01 October 2025	11 June 2026	NatureScot provided consultation responses, which informed the RAEI issued by MD-LOT, across multiple ecological topics, including ornithology, marine mammals, fish and shellfish, and cumulative effects. Key concerns related to the robustness of impact assessment, likely significant environmental effects, on designated sites, and the need for further clarification and additional information.	<p>The Applicant has provided a detailed response to NatureScot’s matters raised in the following submissions: AEIR Chapter 2: Marine and Coastal Physical Processes; AEIR Chapter 3: Fish and Shellfish Ecology; AEIR Chapter 4: Offshore and Intertidal Ornithology; AEIR Chapter 5: Marine Mammals and Other Megafauna; and AEIR Chapter 6: Shadow Derogation Case.</p> <p>Where clarification on other matters was required, these have been responded to in full directly with NatureScot across a number of topics and sub-topics. A copy of the responses to NatureScot against matters raised is provided as an appendix to each AEIR chapter pertinent to the technical topic.</p> <p>A workshop was held with NatureScot to discuss the matters raised on 31st March 2026.</p>

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
North Sea Transition Authority (NSTA)	23 September 2025	14 April 2026	The NSTA highlighted the presence of plugged and abandoned wells within the array area and identified interactions between the export cable corridor and existing oil and gas infrastructure, including active pipelines and producing fields. The NSTA advised that ongoing engagement with pipeline owners, licence holders and field operators is required to ensure safe construction and avoid disruption to existing and future operations, including decommissioning activities.	The Applicant acknowledged the NSTA's comments and confirmed that plugged and abandoned wells will be mapped and avoided during construction. The Applicant also committed to maintaining engagement with pipeline owners, licence holders and field operators throughout the project lifecycle to ensure coordination of activities and reduce disruption.
Northern Lighthouse Board (NLB)	27 August 2025	13 April 2026	The NLB confirmed no objection to the Proposed Offshore Development. Comments focused on navigational safety, including the Navigational Risk Assessment, Aids to Navigation (AtoN), lighting and marking, and the content of post-consent plans. The NLB requested specific amendments to documentation and highlighted the need for appropriate marking, visibility, and promulgation of information.	The Applicant acknowledged the NLB's comments and confirmed that amendments will be incorporated into finalised post-consent plans, including navigation, AtoN, and lighting and marking documentation. Commitments were made to reflect NLB guidance within these plans and to continue engagement throughout the project.
Regional Inshore Fisheries Group	21 October 2025	14 May 2026	The Regional Inshore Fisheries Group, through alignment with the Scottish Fishermen's Federation (SFF), raised concerns regarding potential impacts on commercial and inshore fisheries, including displacement, loss of access to fishing grounds, gear conflict, and long-term effects on fishing activity.	The Applicant provided response to matters raised by the Regional Inshore Fisheries Group through the consultation with SFF. All matters raised by the Regional Inshore Fisheries Group in regard to commercial fisheries were addressed

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
				directly by the Applicant with the consultee.
Royal Yachting Association (RYA)	2 September 2025	13 April 2026	The RYA confirmed no objection to the Proposed Offshore Development but raised considerations regarding navigational safety, including the importance of effective AtoN management. The RYA also highlighted the need for clarity on the selection of the operational base port and wet storage sites, noting that these could have wider impacts and suggesting that consent be conditional on these matters being satisfactorily addressed.	The Applicant acknowledged receipt of the RYA’s consultation response and confirmed that the feedback has been noted. The Applicant welcomed ongoing engagement as the project progresses through determination.
RSPB	20 October 2025	11 June 2026	RSPB Scotland supported the principle of offshore wind development and confirmed that it has no objection to the Proposed Offshore Development in isolation. However, they did object to the Application due to concerns regarding cumulative (in-combination) impacts on seabird populations. Key issues raised included potential adverse effects on the integrity of multiple SPAs, particularly in relation to collision risk, displacement, and additional energetic costs for seabirds. RSPB also raised concerns regarding the reliance on modelling approaches, the application of ‘de minimis’ arguments in the assessment, and the need for a precautionary approach under the Habitats Regulations.	All matters raised by the RSPB in regard to ornithological issues were addressed directly by the Applicant with the consultee.

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
Scottish Environmental Protection Agency (SEPA)	19 September 2025	13 April 2026	SEPA confirmed that they have no objection to the Application based on the information provided. They directed the Applicant to relevant standing advice and guidance and noted that further consultation may be required should any site-specific issues arise that are not covered by existing guidance.	The Applicant acknowledged receipt of SEPA's consultation response and confirmed that the feedback has been noted. The Applicant welcomed further engagement, where required, as the project progresses through determination.
Scottish Fishermen's Federation (SFF)	21 October 2025	14 May 2026	The SFF raised a formal objection to the Proposed Offshore Development, citing significant concerns regarding impacts on commercial fisheries. Key issues included: potential loss of access to fishing grounds and displacement of fishing effort; gear snagging risks associated with floating infrastructure, moorings and cable protection; underestimation of impacts within the EIA, particularly in relation to long-term and cumulative effects; concerns regarding inadequate socio-economic assessment of fisheries impacts; and limitations in baseline data. The SFF also highlighted concerns regarding cumulative impacts with other offshore developments, interaction with marine protected areas, and likely significant environmental effects, on fish ecology (including noise, EMF and habitat disturbance). Further concerns were raised regarding the Fisheries Mitigation, Monitoring and Communication Plan (FMMCP), including	All matters raised by the SFF in regard to commercial fisheries were addressed directly by the Applicant with the consultee.

Consultee	Date of Representation	Date of Applicant Response	Summary of Issues Raised	Summary of Applicant Response
			lack of prior consultation, reliance on outdated guidance, insufficient mitigation measures, and absence of clear compensation mechanisms. The SFF requested enhanced monitoring, reassessment of impact significance, and establishment of long-term compensation and stakeholder engagement mechanisms.	
Scottish Water	25 August 2025	13 April 2026	Scottish Water confirmed that they have no objection to the Proposed Offshore Development. They noted that there are no drinking water protected areas or abstraction sources within the area likely to be affected. General advice was provided in relation to surface water management, including that surface water connections to combined sewer systems are not normally accepted, and that any future connections to public water or wastewater infrastructure would require appropriate applications and approvals.	The Applicant acknowledged receipt of Scottish Water's consultation response, confirmed that the feedback has been noted, and welcomed further engagement as the project progresses through determination.
Transport Scotland	22 September 2025	14 April 2026	Transport Scotland confirmed that they have no comment on the Proposed Offshore Development, noting that the Application relates to offshore works only. They advised that onshore elements will be subject to separate assessment and consultation, and that they will provide input at that stage where relevant.	The Applicant acknowledged receipt of Transport Scotland's consultation response, confirmed that the feedback has been noted, and welcomed further engagement as the project progresses through determination.

1.3.2 Requests for Additional Information

- 1-18 The RAEI issued by MD-LOT focuses on key technical topics requiring clarification and/or additional supporting information. These broadly relate to offshore and intertidal ornithology, marine mammals, fish and shellfish ecology, marine physical and coastal processes, and the Shadow Derogation Case.
- 1-19 The Applicant has structured the AEIR to respond to these topics through the relevant technical chapters, with each chapter providing a targeted and proportionate response to the specific matters raised.
- 1-20 A high-level summary of the key issues raised within the RAEI issued by MD-LOT, and where these are addressed within the AEIR, is provided in **Table 1-2**.

Table 1-2: Summary of MD-LOT Request for Additional Environmental Information (RAEI) and Location of Response

Request for Additional Environmental Information Topic	Summary of RAEI	Where Addressed in Additional Environmental Information Report
Marine Physical and Coastal Processes	<p>Additional information was requested in relation to the physical processes assessment, including:</p> <ul style="list-style-type: none"> • clarification of whether sandwave clearance would be required throughout the operational phase; • whether interannual variability in stratification had been considered; whether floating foundations were included within the stratification assessment; • whether the dynamic nature of the Buchan and East Orkney fronts had been considered in relation to stratification impacts; and • the factors considered within the cumulative effects assessment and how the conclusion that cumulative effects are unlikely to be significant had been reached. 	AEIR Chapter 2 – Marine and Coastal Physical Processes
Fish and Shellfish Ecology	<p>Additional information was requested in relation to:</p> <ul style="list-style-type: none"> • the assessment of potential impacts on sandeel and herring such that clear and informed conclusions on the significance of effect can be made including detail on the provision of mitigation relied upon for these conclusions and confidence placed on these measures in terms of effectiveness; • to provide an updated cumulative effects assessment on fish and shellfish receptors, monitoring and mitigation measures; and • To review the NS representation for further details. 	AEIR Chapter 3 – Fish and Shellfish Ecology
Ornithology	<p>Additional information was requested in relation to the ornithological impact assessment, including:</p> <ul style="list-style-type: none"> • provision of an updated assessment of impacts to guillemot through displacement using the Matrix approach alone with new PVAs being undertaken and counterfactuals updated incorporating adjustments to the Mean Seasonal Peak.; • assessment of cumulative effects to great black backed gull through collusion inclusive of sabbaticals being revisited on re-assessments; • clarification on how the macro-avoidance rate has been applied cumulatively; • clarification as to why literature sources more applicable to the Scottish context (e.g. Wade et al (216) have not been used for the purpose of defining sensitivity; • re-run of PVAs for kittiwake and razorbill using the Matrix approach, with PVA results based on SeabORD; 	AEIR Chapter 4 – Ornithology

Request for Additional Environmental Information Topic	Summary of RAEI	Where Addressed in Additional Environmental Information Report
	<ul style="list-style-type: none"> • consideration of matters raised above in relation to the RIAA; • consideration of new in-combination data being available as part of other projects update to assessments; and • to review the NS representation for further details and discuss matters raised with MD-LOT and NS. 	
Marine Mammals	<p>Additional information was requested on the assessment of Marine Mammals, including:</p> <ul style="list-style-type: none"> • clarification on piling parameters and durations used as part of the maximum design scenario to fully consider the magnitude of effect; • confirmation was sought on whether concurrent piling is likely, whether the 1.4km instantaneous PTS value for grey seals is an accurate underwater noise modelling output and confirmation of the maximum piling durations used for individual piles, including total duration and temporal spread in construction for modelling; • provision on the number of individuals impacts from cumulative PTS across each of the piling scenarios to be updated using flee speeds agreed by NS; • provision of further information to understand the compounding effects of modifications/assumptions used to include cumulative PTS within iPCoD modelling and the impact each change has on the outputs for each species, particularly minke whale and harbour porpoise; • provision of further modelling information to understand assumptions/modifications influence the change in population trajectory; • re-evaluation of the CEA including assessment through iPCoD modelling • revisit of the justification set out in the CEA and further explanation provided in relation to cumulative disturbance from other construction activities; and • on the Southern Trench ncMPA, assessment is to be revisited to provide the percentage area of the ncMPA that will be disturbed during pile driving for both project alone and cumulatively including visual representation of disturbance range and impacts to sandeel and herring as key prey species for minke whale 	AEIR Chapter 5 – Marine Mammals

Request for Additional Environmental Information Topic	Summary of RAEI	Where Addressed in Additional Environmental Information Report
Shadow Derogation Case	Further information was requested by MD-LOT to support the Shadow Derogation Case, including consideration of advice provided by NatureScot in relation to qualifying species with potential for adverse effects, and updating of the shadow derogation case accordingly.	AEIR Chapter 6 – Shadow Derogation Case

1.4 STRUCTURE OF THE ADDITIONAL ENVIRONMENTAL INFORMATION REPORT

1.4.1 Overview of Submitted Documents

1.4.1.1 Summary of Additional Environmental Information Chapters

1-21 Each AEIR chapter provides a focused response to the RAEI raised during the determination process, supported by updated analysis, clarification of the EIAR, and additional evidence where required.

1-22 A summary of the key content of each chapter is provided below, informed by the RAEI, workshops with NatureScot and MD-SEDD and relevant consultation and advice received during this process:

- **Additional Environmental Information Report Chapter 1 – Introduction (this document)** which provides additional information on;
 - An overview of the Application, summary of consultation responses and RAEIs, and sets out the structure and approach to the Additional Environmental Information Report.
- **Additional Environmental Information Report Chapter 2 – Marine and Coastal Physical Processes** which provides additional information on;
 - review of the assessment on significance of impacts associated with sandwave clearance, including whether the assessment adequately accounted for sandwave mobility, sediment recovery processes, and the spatial extent of clearance activities relative to the wider sedimentary environment;
 - confirmation of no sandwave clearance activities being anticipated during operational phases;
 - clarification on whether interannual variability in stratification strength, duration and spatial extent had been adequately represented using established physical metrics;
 - strengthening of the evidence base regarding reliance on mixed layer depth (MLD) alone as a proxy for water-column stability, and confirmation that the seasonal development, persistence and variability of regional density fronts has been considered;
 - detail of the interaction between floating foundation draft and water-column stratification;
 - clarification on the cumulative assessment of effects on stratification, frontal systems and sedimentary processes;
 - discussion on qualitative, evidence-based approach of assessment and the treatment of uncertainty associated with physical processes; and
 - discussion on commitment of the Applicant to undertake post-consent monitoring of the water-column (stratification) via Conductivity, Temperature, and Depth (CTD) profile measurements, as part of the wider marine monitoring framework.

- **Additional Environmental Information Report Chapter 3 – Fish and Shellfish Ecology** which provides additional information on;
 - description of the methodology used within the AEIR for the update of assessments, cumulative effects assessments and Valued Ecological Receptor (VER) approach to receptor selection;
 - clarity on the Maximum Design Scenario (MDS) considered for assessment;
 - building upon the baseline fish and shellfish ecology characterisation and updating all species present at the Proposed Offshore Development Site;
 - updated baseline and assessment of all relevant impacts for herring and sandeel including provision of heat maps for both species to demonstrate their spawning potential, and discussion on the implementation of embedded and secondary mitigation such that conclusions of significance of effects can be made;
 - updates to calculations of habitat loss for other receptors (in addition to herring and sandeel) and inclusion of the addition of mooring chain presence to long term habitat loss;
 - update of the Cumulative Effects Assessment to identify any significant cumulative effects to fish and shellfish receptors; and
 - discussion of proposed mitigation and proposals for inclusion in a Fish Mitigation Plan (FMP).

- **Additional Environmental Information Report Chapter 4 – Offshore and Intertidal Ornithology** which provides additional information on;
 - discussion on approach to use of SeabORD in terms of distributional responses. This also involved use of the Matrix approach to re-assess guillemot impacts incorporating adjustments to the Mean Seasonal Peak. Additional information on the impacts to razorbill and kittiwake was presented using the matrix only approach for these species;
 - additional environmental information on the in-combination impacts from the Proposed Offshore Development in-combination with other reasonably foreseeable projects (presenting an updated version of the in-combination assessment using the approach and PVA by the Muir Mhòr, Ossian and Caledonia projects to be applied to kittiwake, herring gull, guillemot, razorbill, puffin and gannet) and additional environmental information on the cumulative effects with other projects to the regional non-breeding population of great black-backed gull
 - clarification on the errata of the duplication of gannet and provision of corrected text;
 - collision risk modelling (CRM) in terms of macro-avoidance rates and calculations showing the mean value CRM outputs alongside the median value and the upper and lower 95% bootstrap confidence intervals;

- discussion on sabbatical birds and their consideration within breeding season as part of apportioned impacts;
 - clarification as to what literature sources have been used for the purposes of defining sensitivity, including Wade *et al* (2016);
 - provision of impact apportioning taking into account any changes in assessment as outlined in the bullets above for guillemot, razorbill, herring gull, kittiwake, and gannet; and
 - Population Viability Analysis (PVA) screening undertaken taking cognisance of updates to apportioned impacts for guillemot, razorbill, herring gull, kittiwake, and gannet.
- **Additional Environmental Information Report Chapter 5 – Marine Mammals and other Megafauna** which provides additional information on;
 - clarification on the Maximum Design Scenario in terms of the piling parameters and durations used and associated impacts from increased underwater noise from pile driving activity;
 - confirmation on instantaneous Permanent Threshold Shift (PTS) value for grey seals as an output from underwater noise modelling;
 - verification of underwater noise outputs utilising the standard flee speeds as requested by NatureScot;
 - presentation of the spatial overlap of modelled contours using dose response outputs from the Proposed Offshore Development to the ncMPA;
 - revisit of the Cumulative Effects Assessment including remodelling of the Maximum Design Scenario for cumulative assessment using iPCoD for disturbance and PTS inputs and presentation of the percentage of overlap with the Southern Trench ncMPA from disturbance from each project; and
 - assessment of the potential impacts of pile driving on the Southern Trench MPA with consideration of project alone and cumulative impacts and those associated with key prey species (sandeel and herring).
 - **Additional Environmental Information Report Chapter 6 – Shadow Derogation Case** which provides additional information on;
 - an update on the level of compensation required for each species (kittiwake, guillemot, razorbill, puffin and gannet) following NatureScot advice on which SPA qualifying features have an Adverse Effect on Site Integrity (AEOSI) (or where this could not be excluded); and
 - provision on update against proposed compensation measures following submission of the Application including; management of marine litter, artificial nesting structure for kittiwake, additional management measures and prey species habitat creation.

1.5 SUMMARY

- 1-23 This report has outlined the context for, and approach to, the AEIR prepared in response to the RAEI issued by MD-LOT received during consultation. The accompanying documents provide proportionate and targeted responses in relation to the Application in order to assist MD-LOT in reaching their conclusions on the likely significance of effects of the Proposed Offshore Development and subsequently on the decision of granting consent.