Aberdeen Airport

Aberdeen International Airport

Aberdeen International Airport Limited
Dyce, Aberdeen
AB21 7DU
Scotland

T: +44 (0)870 040 0006
W: aberdeenairport.com

FAO Iain MacDonald
Marine Licensing Operations Team
Scottish Government

Via Email

ABZ Ref: ABZ3179

27th October 2023

Dear Iain

Ref: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

I refer to your request for scoping opinion received in this office on 4th October 2023.

The scoping report submitted has been examined from an aerodrome safeguarding perspective and we would make the following observations:

- The proposed site is located outwith the wind farm consultation zone and instrument flight procedures safeguarding zone for Aberdeen Airport and as such aviation impacts with regards to the airport are not expected.

Yours Sincerely
[Redacted]

Kirsteen MacDonald

Safeguarding Manager
Aberdeen Airport
[Redacted]

abzsafeguard@aiairport.com

Aberdeen City Council

From:	Robert Forbes
To:	MD Marine Renewables
Subject:	RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Date:	06 November 2023 10:46:04
Attachments:	image001.png

Good morning

Apologies for the delay in responding regarding the above,

I can advise that the Planning Authority have no comments regarding the scoping consultation.

Yours sincerely

Robert Forbes MRTPI
Senior Planner

Development Management
Strategic Place Planning
Aberdeen City Council
Business Hub 4
Marischal College
Broad Street
Aberdeen
AB10 1AB

T: 01224 067942
[Redacted]

E: rforbes@aberdeencity.gov.uk

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: Thursday, October 26, 2023 9:55 AM
To: MD.MarineRenewables@gov.scot
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Good morning,

Kind reminder that if you wish to submit any representations in response to the above consultation, I would be grateful if they could be forwarded to me in an electronic format (MD.MarineRenewables@gov.scot) by **03 November 2023**.

Kind Regards
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

The Scottish Government

Scottish Government
Riaghaltas na h-Alba

In the service of Scotland | Integrity | Inclusivity | Innovation | Collaboration | Kindness

---

From: MD Marine Renewables
Sent: Wednesday, October 4, 2023 2:00 PM
To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Cc: John Mckay <John.Mckay@gov.scot>; Kirsty Black <Kirsty.Black@gov.scot>
Subject: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
(collectively referred to as the "EIA Regulations").

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine

licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Buchan Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at:
https://marine.gov.scot/node/24504

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment ("EIA") Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project**. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

Please submit your response electronically to MS.MarineRenewables@gov.scot by **03 November 2023**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Many thanks,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

The Scottish Government

Aberdeenshire Council

Aberdeenshire COUNCIL

Our Ref: ENQ/2023/1421
Your Ref:

Ask for: Fiona Rendall
Tel: 01467 533088
Email: fiona.rendall@aberdeenshire.gov.uk

Scottish Government
Marine Licensing & Consenting Casework Officer
Licensing Operations Team
Marine Directorate
Marine Laboratory
Aberdeen
AB11 9DB

2 November 2023

Dear Sir/Madam

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2007

Consultation in respect of an EIA Scoping Opinion for offshore aspects of Buchan Offshore Wind Farm

1.1 I refer to your consultation in respect of a Scoping Request for the above proposal received on 5 October 2023. I am in receipt of all necessary information and can now offer a response to this consultation. Your request sought advice relating to the content of a future environmental assessment and a scoping report and appendices has been provided for consideration.

1.2 Aberdeenshire Council, as a terrestrial authority, are generally only concerned with potential effects upon the intertidal zone between mean high-water springs (MHWS) and meal low water springs (MLWS) with offshore infrastructure projects like this. As such, our comments will be limited to effects on the intertidal zone, with Marine Scotland being best places to consider whether the offshore elements of the scoping report are acceptable and if the proposals can be adequately managed with low risk to the marine environment.

1.3 Consultation has been undertaken with the Council's Archaeology and Natural Heritage teams.

2.0 Response Overview

2.1 Having reviewed the submitted documentation the Planning Service generally agrees with the proposed scope of the EIA in relation to those aspects which may impact upon the Aberdeenshire Council Area with issues to be considered further provided by Natural Heritage.

3.0 Site Description, Approach to consenting and EIA Methodology

3.1 The site description and characteristics of the development have been satisfactorily identified within the Scoping Report.

3.2 It is noted that a separate screening/scoping request will be lodged with Aberdeenshire Council for the onshore elements of the project.

3.3 The EIA Methodology outlined within the Offshore Scoping Report appears to be typical for a development of this type and is considered acceptable.

4.0 Planning Policy

4.1 In respect of planning policy, the Planning Service has little to add to the proposed scope. It should be noted that the primary means of assessment for onshore impacts shall be the development Plan (Aberdeenshire Local Development Plan 2023 and National Planning Framework 4) and would be a key consideration for relevant potential impacts.

5.0 Intertidal Ecology and Ornithology

5.1 The following information has been provided in consultation with the Council's Natural Heritage Team.

5.2 The range of ecological surveys that is proposed to be included in the EIA is acceptable.

5.3 With regard to the list of designated sites (page 260), Loch of Strathbeg Special Protection Area appears to have been omitted although the Ythan Estuary, Sands of Forvie and Meikle Loch SPA has been included. This may be an omission but if there has been a reason for this exclusion it would be useful for this to be provided for clarity.

6.0 Recreation (Coastal Path)

6.1 The following information has been provided in consultation with the Council's Natural Heritage Team.

6.2 Consideration should be given to the impact of cable installation on recreational use of the beach (intertidal area).

6.3 The beach at Rattray is well used for walking and some horse-riding and this will extend into the intertidal area when the tide is out. The installation of the cable could impact on this use, particularly if open cut trenching is to be used, rather than horizontal directional drilling. On the basis of this, the impact of the proposal on the coastal path core path and general recreational use within the intertidal area should be included for consideration in the EIA or it should be clearly identified that this is being considered within the EIA for the onshore works.

7.0 Seascape, Landscape and Visual Impact Assessment

This chapter has been reviewed by the Planning Service. The approach is considered to be typical for a development of this type and the rationale is acceptable

in relation to the scope of the assessment. In response to the scoping questions (Section 16.11), it is agreed that the study area is acceptable and that the seascape, landscape and visual impacts should be scoped out of the EIA.

8.0 Archaeology and Cultural Heritage

8.1 The following information has been provided in consultation with the Council's Archaeology Team.

8.2 Answers have been provided to the questions posed in the Marian Archaeology and Cultural Heritage Chapter of the scoping report (Section 14), with agreement to all Questions 1-8. In summary, the proposed scope and methodology is agreed.

9.0 Conclusion

9.1 I hope the above information is of assistance as a formal scoping opinion in respect of the relevant EIA Report. Obviously during the processing of any associated planning application other issues may become obvious following public consultation and consultations with statutory consultees.

9.2 This opinion will be held for public inspection for a two-year period, or until a planning application is submitted at which time the opinion will be transferred to the planning register with the application.

Yours faithfully

[Redacted]

Head of Planning and Economy

British Telecom
Network Protection

From:	radionetworkprotection@bt.com
To:	MD Marine Renewables
Cc:	John Mckay; Kirsty Black; radionetworkprotection@bt.com
Subject:	WID13225 - SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Date:	13 October 2023 12:51:56
Attachments:	image002.png image004.png image001.png image005.png

BT Group

Our Ref: WID13225

Thank you for your email dated 04/10/2023.

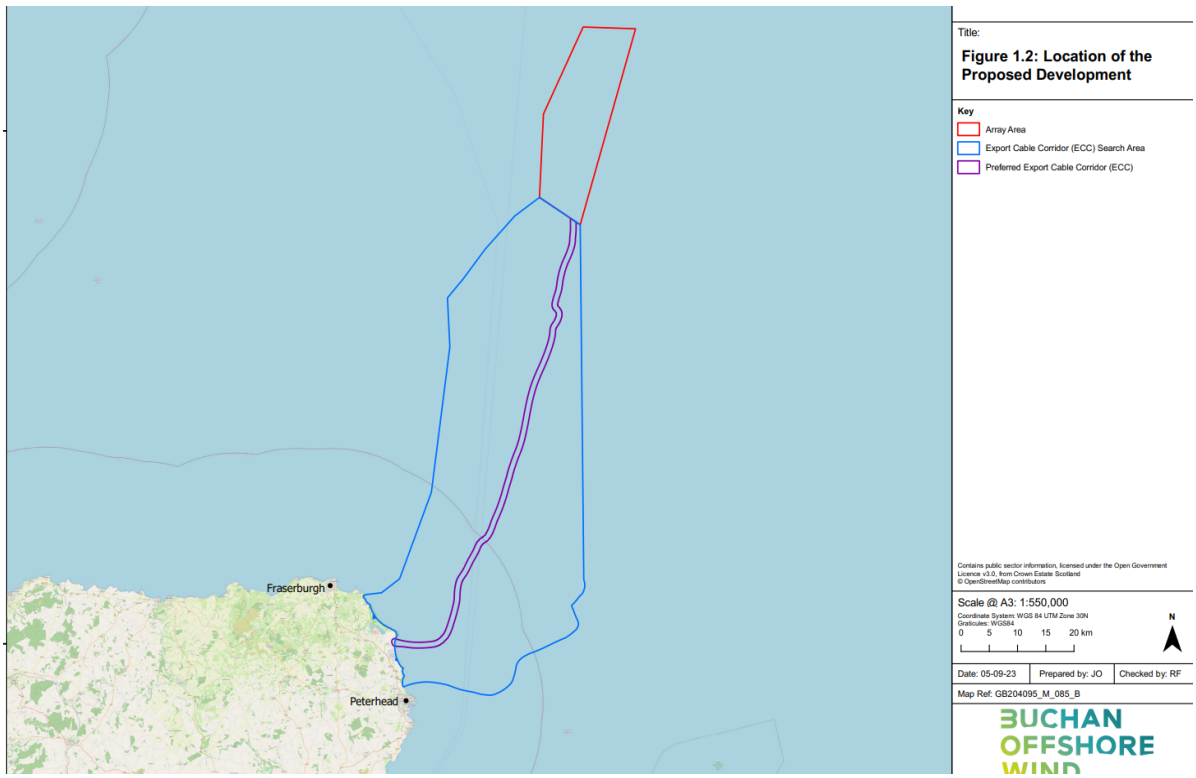
We have studied this proposal, with respect to EMC and related problems to BT point-to-point microwave radio links.

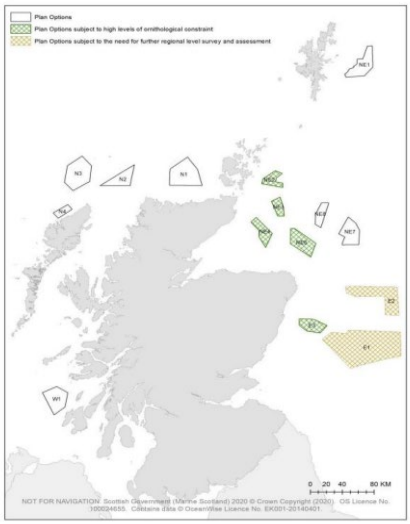
The conclusion is that the locations provided in figure 1.2 below should not cause interference to BT's current and presently planned radio network. For reference regarding the second picture below, the third shows where there are active/planned BT radio links shown with red, blue and purple lines.

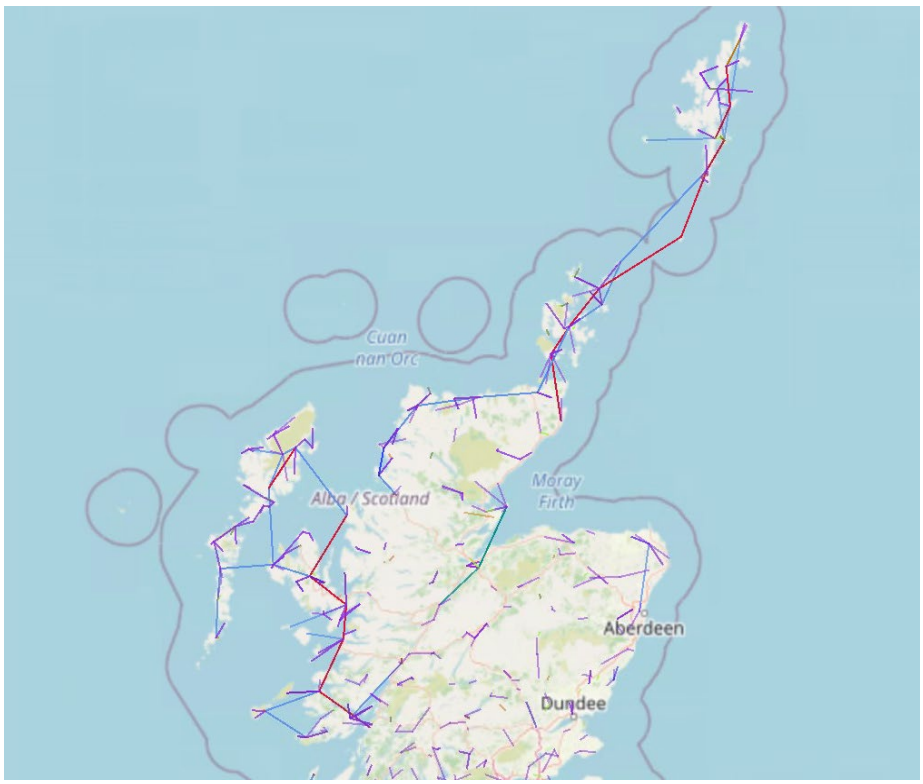
BT requires 100m minimum clearance from any structure to the radio link path. If the proposed locations change, please let us know and we can reassess this for you.

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

Please direct all queries to radionetworkprotection@bt.com







Kind Regards

Lisa Smith
National Radio Planner
Network Planning

BT Group

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: Wednesday, October 4, 2023 2:00 PM
To: MD.MarineRenewables@gov.scot
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
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(collectively referred to as the "EIA Regulations").

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Buchan Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: https://marine.gov.scot/node/24504

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment ("EIA") Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project**. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

Please submit your response electronically to MS.MarineRenewables@gov.scot by **03 November 2023**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Many thanks,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

The Scottish Government

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Cruden Community Council

From: [Redacted]
To: Iain Macdonald
Subject: Cruden Community Council Response to SCOP-0031
Date: 07 November 2023 14:37:37

Dear Iain,

Just to clarify the lack of response from CCC. We met on Tuesday 24th October and discussed the above. I was tasked with reading and commenting on the scoping exercise, primarily in relation to the ornithological data given the importance of breeding sites around the Buchan coastline along with offshore feeding sites (both during the breeding and non-breeding seasons.) However I was abroad from the 25th October returning on the 3rd November so had little time to both read and comment by the closing date. That said on behalf of Cruden Community Council I should add that we do support the recommendations, methodology etc., for the proposed offshore windfarm. As a result we are indeed submitting a 'Nil' response.

But I have a couple of questions that do not in themselves limit our support. Firstly (and please bear in mind that I have only had time to 'skim' read the substantial report), I am a little surprised that in section 10.5.2.4 page 260, there is no mention of Gannets at Troup Head. As you may be aware this site is only one of two major onshore breeding colonies in the UK, the other being Bempton cliffs on the east Yorkshire coast. Given the foraging distances that these birds travel during the breeding season, have the potential negative effects on breeding success been suitably considered? My second question relates to the aerial surveys, which began during 2022 and the figures that will have been obtained since then (and on-going) for maximum numbers of marine birds at the surveyed site. Numbers of most if not all marine birds have been affected by bird flu, which has particularly affected auk species, kittiwakes and fulmars along the east coast of Scotland. Gannets numbers have also declined. Given that numbers are likely to increase as effects of the virus reduce, will the aerial surveys take the effects of bird flu into account when the ornithological scoping exercise is completed, i.e., might figures be adjusted in any way?

Kind regards,

(Dr) Phillip Neville

Dee District Salmon Fishery Board

Dee District Salmon Fishery Board

Marine Licensing and Consenting Casework Officer
Licensing Operations Team
Marine Directorate
Scottish Government
Marine Laboratory
375 Vicotria Road
Aberdeen
AB11 9DB

By email to MD.MarineRenewables@gov.scot
3rd November 2023

Dear Iain Macdonald,

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 APPLICATION AND MARINE LICENCES FOR THE BUCHAN OFFSHORE WINDFARM LIMITED – BUCHAN OFFSHORE WIND – SCOTWIND NE8 SITE LOCATED APPROXIMATELY 75KM NORTH OFF THE COAST OF PETERHEAD

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site-Consultation on Request for Scoping Opinion

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
(collectively referred to as the "EIA Regulations").

On behalf of the Dee District Salmon Fishery Board (Dee DSFB) we welcome the opportunity to respond to the *Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site-Consultation on Request for Scoping Opinion*

Designations & Conservation Status

As a statutory body charged with the protection of Atlantic salmon and sea trout stocks within its district, the Dee DSFB has a duty to ensure that there are no significant adverse impacts upon the populations of these species.

The Dee has been designated as a Special Area of Conservation under the EC Habitats Directive 92/43 EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna for Atlantic salmon (the principal species for which it receives this designation). The Dee District also supports populations of trout, eels and brook, river and sea lampreys.

Sea trout, common to all the rivers within the Dee District, are a priority species under the United Kingdom's Biodiversity Action Plan (UKBAP).

All lamprey species are protected under the EC Habitats Directive whilst river and sea lampreys are additionally protected under the UKBAP priority list.

Eels are a UKBAP priority species, critically endangered under the IUCN red list and protected under CITES.

Wild Salmon Strategy and Conservation regulations

In January 2022, the Scottish Government released its Wild Salmon Strategy which gave a clear message that there is sadly now unequivocal evidence that populations of Atlantic salmon are at crisis point. The Strategy calls on government agencies, as well as the private sector, to prioritise the protection and recovery of Scotland's wild Atlantic salmon populations.

One of the key pressures identified in the strategy is marine development, with marine renewables highlighted as having the potential to impact salmon through noise, water quality and effects on electromagnetic fields (EMFs) used by salmon for migration.

Furthermore, the Conservation of Salmon (Scotland) Regulations 2016 has led to the production of stock assessments for all Scottish salmon rivers, based on catch data. The assessments estimate whether the number of adults returning to the river in each of the previous five years will produce enough eggs to keep the population size above a critical threshold.

For the Dee, like other north-east rivers, the assessments have shown a declining trend in catches since 2011. Nonetheless, the Dee has been categorised as a Grade 1 river, meaning that the stocks have most likely been above the critical threshold - the Conservation Limit - over the last five years. It is however apparent that specific stock components, such as the Spring salmon stock on the Dee are critically low.

Assessment of the juvenile salmon stocks in the Dee through the National Electrofishing Programme for Scotland (NEPS) has evaluated juvenile stocks in the Dee as Grade 2, suggesting that there are significant issues with recruitment and survival within the catchment (Malcolm *et al* 2020). With greater pressures on marine survival such that only approximately 3% of smolts return to the river as adults, we need to address any pressures within the freshwater and marine environments to protect Dee salmon stocks.

Position

The Dee DSFB welcomes the opportunity to respond to the scoping opinion and would wish to be consulted further during this process with specific interest in the migratory fish species Atlantic Salmon and sea trout. We echo the comments of our representative body for Scotland's District Salmon Fishery Boards, Fisheries Management Scotland and call for more research upon the impacts of this development on diadromous fish.

Under Scottish Marine Energy Research (ScotMER), the Diadromous Fish Receptor Group has identified evidence gaps related to the health, distribution, and impacts on Diadromous fish (salmon, sea trout, etc.). Scottish Government has published an 'evidence map' (available for download at the above link) which identifies and scores these evidence gaps according to a specific prioritisation process. It is important that the relevant evidence gaps are considered in full by the applicant, and developers should *contribute* to filling these evidence gaps as a **specific condition of consent**.

To properly assess Environmental Statements for developments, information on the use of the development area by diadromous fish should be provided. We note that in chapter 9 section 9.7 of the scoping report (Table 9.6) that the impact factor Electromagnetic Fields (EMF) and thermal effects of cables - EM9 has 'scoped in' fish and shellfish. However little information seems to be provided on diadromous fish. The statement that "It is also known that salmonids and anguillids use geomagnetic fields to orientate during early life history and for migration as adults (Hutchison et al., 2021), suggests there is further research needed here to ensure that appropriate mitigation can be provided.

If such information is lacking then a suitable monitoring strategy should be devised, either for the area in question or through contributing to strategic projects undertaken through ScotMER. Any monitoring strategies must include pre-construction monitoring in order that baseline information on movement, abundance, swimming depth, feeding behaviour etc. can be collected.

We would also argue that that the 'Areas to be considered in the EIA' in table 9.6 include the Export Cables (Including Landfall) for Electromagnetic Fields (EMF) and thermal effects of cables - EM-9, to ensure that appropriate burial of any cable and minimisation of any EMF impacts is achieved on costal migratory routes for salmonids.

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

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

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

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

ii. *Electromagnetic fields (EMFs) arising from cabling*
Electromagnetic fields from subsea cables have the potential to interact with European eels and possibly salmonids if their migration or movement routes take them over sub-sea cables. The Earth's magnetic field is a cue used for migration, so anything that interferes with this signal is an important consideration. All cables should be buried to at least a depth of 1.5m where possible, or covered with rock armour to an equivalent depth where burial is not possible. We are aware that Marine Scotland Science have undertaken some research to investigate electro-magnetic force impacts on adult and post smolt salmon and European eels. Whilst for salmon this work did not demonstrate any significant response to the magnetic field in terms of alarm, avoidance, accelerated or decelerated swimming, it did not provide any information on interference with the salmon's ability to detect and utilise the Earth's magnetic field.

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

Conclusion

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

Yours sincerely

[Redacted]

Jamie Urquhart
Fisheries Protection Manager, Dee District Salmon Fishery Board

Edinburgh Airport

From:	Safe Guarding
To:	MD Marine Renewables
Cc:	Safe Guarding
Subject:	Scoping Consultation - Buchan Offshore Wind Farm
Date:	13 October 2023 11:35:24
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

Edinburgh Airport
Where Scotland meets the world

Our values

t: +44 (0)131 344 3845 [Redacted]
www.edinburghairport.com

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

Green Volt Offshore Wind

03 November 2023

Iain MacDonald
Marine Directorate,
Scottish Government
Marine Laboratory,
Aberdeen
AB11 9DB

Dear Mr. MacDonald,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
(collectively referred to as the "EIA Regulations")

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

Thank you for consulting Green Volt Offshore Windfarm Limited on the scoping report submitted in respect of the proposed section 36 application and marine licence applications for the Buchan Offshore Wind Farm.

Green Volt Offshore Windfarm Limited has been formed by Flotation Energy Ltd (Flotation Energy) and Vårgrønn AS (Vårgrønn), the developers of the Green Volt offshore windfarm ('Green Volt'). Flotation Energy is an offshore wind development company, headquartered in Edinburgh, UK. Founded in 2018, the company is pioneering the deployment of both floating and fixed offshore wind in Scotland, the UK and internationally. Vårgrønn is a growing agile offshore wind company and established as a joint venture between the global energy company Plenitude (Eni) and the Norwegian energy entrepreneur and investor HitecVision.

The section 36 and marine licence applications for the Green Volt offshore windfarm were submitted to MD-LOT on 20 January 2023. The applicant may wish to consider the Green Volt offshore applications which have been submitted with up-to-date project data and EIA

information. The Green Volt offshore applications are available on the Green Volt website and on the Marine Scotland Information website.

The proposed Buchan offshore windfarm array area is located approximately 48 km from the Green Volt windfarm site and 50 km from the Green Volt export cable corridor.

Offshore Aspects

Following an initial review of the Buchan Offshore Windfarm Scoping Report, we note that the proposed project's Export Cable Corridor (ECC) search area, for which Buchan Offshore Wind Ltd are seeking a Scoping Opinion, partially overlaps with the northern landfall option for the Green Volt offshore cable export corridor. Therefore, there is potential for the Buchan offshore cables to cross the Green Volt offshore export cable corridor.

Based on these potential interactions with Green Volt, we would anticipate that the offshore EIA for the proposed Buchan project would likely consider (but not be limited to) the following:

- impacts on the offshore elements of the Green Volt Offshore Windfarm project, including:
    - Offshore export corridor between the offshore substation to the landfall, particularly the St Fergus South (north of Peterhead) primary option.
    - increased vessel traffic and from the physical presence of Buchan offshore infrastructure that may lead to disruption or obstruction of the Green Volt activities.

Green Volt has an operational target date of 2027 and should be included in any cumulative assessments. Consideration should be given to cumulative impacts on the Southern Trench nature conservation Marine Protected Area (ncMPA), designated for minke whale, burrowed mud, front and shelf deeps.

We note that the Preferred ECC for Buchan offshore windfarm makes landfall within Rattray Bay, north of the St Fergus Gas Terminal, and does not overlap with the Green Volt export cable corridor. However due to the proximity to the northern Green Volt export cable corridor option, impacts from an export cable installed within the Buchan Preferred ECC should still be considered particularly in relation to increased vessel traffic on Green Volt. There is also potential for cumulative impacts on the Southern Trench ncMPA from physical presence of infrastructure.

Onshore Aspects

We note that Buchan Offshore Wind Ltd anticipates that the grid connection location will be within the Peterhead area of Aberdeenshire. It is therefore anticipated that there will be interactions with the Green Volt onshore export cable route between the landfall and New Deer.

The onshore EIA report covering the onshore elements of the Green Volt offshore windfarm was submitted to Aberdeenshire Council on 3rd August 2023.

Given the potential for both the Buchan and Green Volt projects to have onshore works in the Peterhead area, we would anticipate that the onshore EIA should consider the following:

- Direct impacts on the onshore elements of Green Volt, including landfall works, such as the Horizontal Directional Drilling (HDD) compound, and the onshore export cable route to New Deer.

03 November 2023

We would welcome ongoing engagement with the Buchan Offshore Windfarm team throughout the EIA process, and particularly on the outcomes of any cumulative impact assessment undertaken by them. The Green Volt team can be contacted at hello@greenvoltoffshorewind.com.

Yours sincerely,

Mailys Billet
Senior Offshore Consenter

Historic Environment Scotland

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

By email to:
MD.MarineRenewables@gov.scot

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

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our case ID: 300067419
Your ref: SCOP-0031

17 November 2023

Dear Marine Directorate

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Buchan Offshore Wind Farm
Scoping Report

Thank you for your consultation about the above scoping report which we received on 04 October 2023. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority's archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings. In this case, you should contact Aberdeenshire Council Archaeology Service (archaeology@aberdeenshire.gov.uk ;01467 534333; Woodhill House, Westburn Road, Aberdeen, AB16 5GB)

Proposed Development
We understand that the proposed development comprises a maximum of 70 turbines standing up to 355m high, plus associated infrastructure including:

- Associated supporting structures, including floating foundations, mooring systems and anchors;
- A network of cables linking the individual turbines together
- Scour and cable protection
- Up to three offshore substation platforms and associated support structures, foundations and scour protection;
- Up to three offshore export cables, connecting the offshore substation platforms to the landfall location;
- one immediate reactive compensation platform; and
- cable protection and / or utility crossings where required.

Scope of assessment

We note that the current Scoping consultation relates only to the marine element of the development and does not cover the onshore impacts such as grid connections which will be covered by a separate EIA process.

We also note that potential setting impacts on terrestrial assets are not included in the Scoping report. It is not clear if this is because they will be addressed in the terrestrial EIA process or if they have been omitted because the applicants propose to scope out landscape and visual impacts from further assessment (Chapter 16). While we would have wished to see this issue addressed in the Scoping report, we can confirm that given the distance between the proposed development and any terrestrial cultural heritage assets we are content for potential setting impacts from the turbine array to be scoped out of further assessment.

We welcome that impacts on the marine archaeological baseline will be scoped in to the assessment and have the following comments on the Report.

We are content with the study areas defined for marine archaeology, and with the baseline data sources listed in section 14.5.1. We note and welcome the proposals outlined in section 14.10.1 to use project-specific survey outputs to enhance the understanding of marine archaeology within the study area. Any such survey work should be undertaken in a manner that facilitates its archaeological analysis and use.

We are content that the potential impacts on marine archaeology and cultural heritage have been identified adequately within the Scoping Report.

We welcome the proposals to use embedded mitigation strategies to manage and mitigate impacts on the marine historic environment. We are content that the proposals to undertake desk-based assessments and reviews of marine geophysical surveys and geotechnical datasets will help to identify marine and intertidal historic assets and ensure appropriate mitigation can be implemented. We support the use of this information to avoid archaeological seabed features and to create appropriately sized Archaeological Exclusion Zones around marine archaeological assets.

While we welcome the proposed development of a marine archaeological Written Scheme of Investigation (WSI) and a Protocol for Archaeological Discoveries (PAD), we recommend that these documents are developed as part of the EIA Reporting process rather than post-consent as proposed in the Scoping report. The Crown Estate's guidance for WSI's for offshore wind farm projects states that an outline WSI should be developed during the EIA process with the final version agreed during post consent works, which we encourage. The mitigation measures laid out in the WSI and PAD are

fundamental to the EIA process as they set out the proposed mitigation strategies to be used during the development works. They should demonstrate that any anticipated significant effects have been mitigated to an acceptable level, allowing the Marine Directorate to make a fully informed consenting decision.

We are content with the proposed methodology for assessment of impacts on marine heritage assets and sites.

Further information
Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Deirdre Cameron who can be contacted by phone on 0131 668 8896 or by email on Deirdre.Cameron@hes.scot .

Yours sincerely

Historic Environment Scotland

Joint Radio Company Ltd

From: JRC Windfarm Coordinations Old
To: Iain Macdonald
Cc: MD Marine Renewables; Wind SSE
Subject: Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - SCOP-0031 [WF784666]
Date: 02 November 2023 10:17:18
Attachments: image.png

Dear Iain,

A Windfarms Team member has replied to your co-ordination request, reference **WF784666** with the following response:

Please do not reply to this email - the responses are not monitored.
If you need us to investigate further, then please use the link at the end of this response or login to your account for access to your co-ordination requests and responses.

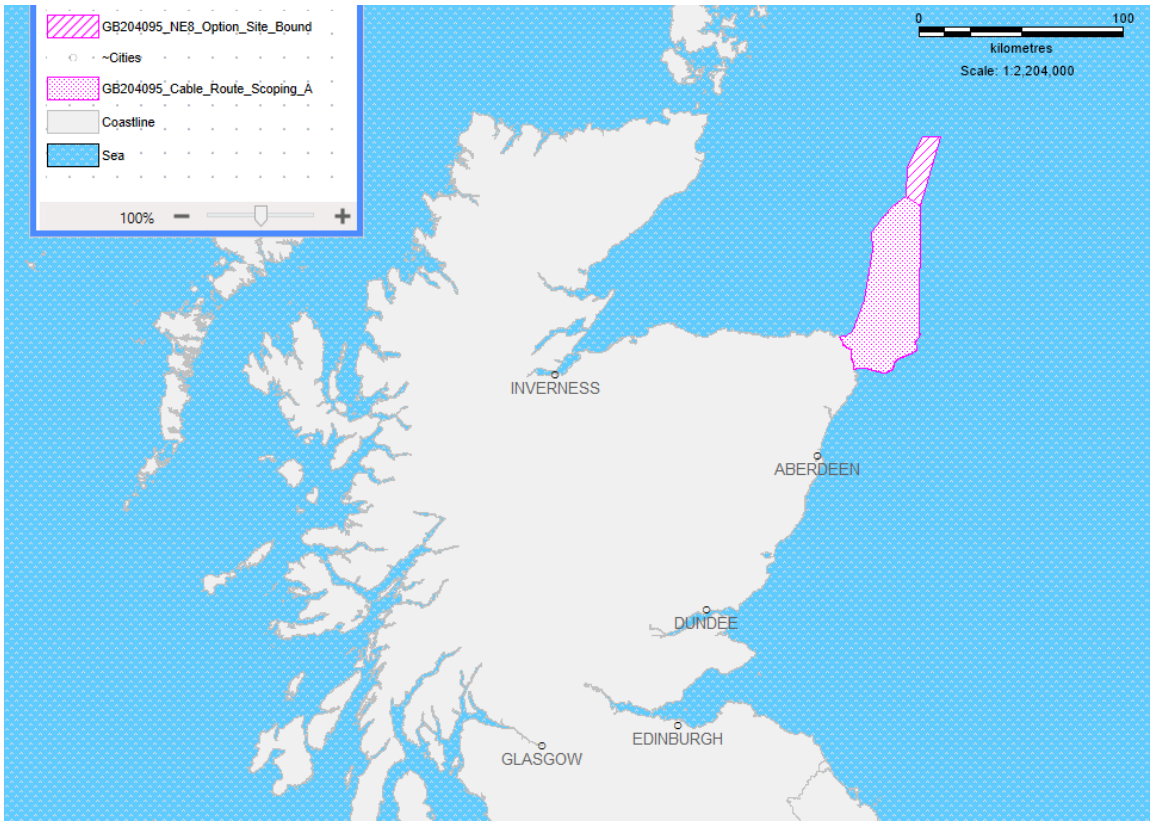
Dear Iain,

Thank you for the KML files supplied for the turbine array area and cable route search area.

***REF:** SCOP-0031*

***Site Name**: Buchan Offshore Wind - Scotwind NE8 Site*

***Turbine(s) NGR:** Up to 70 WTG in NE8 Option Site Area. See below map for indicative development envelope(s).*



***Max Hub Height**: 185m* ***Max Rotor Radius**: 155m*

*This proposal is ***cleared*** 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. 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

We hope this response has sufficiently answered your query.
If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

https://breeze.jrc.co.uk/tickets/view.php?id=31704

Maritime & Coastguard Agency

Vaughan Jackson
Maritime and Coastguard Agency
UK Technical Services - Navigation
Bay 2/24
Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

Your Ref: SCOP-0031

Date: 2nd November 2023

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

Via email: MD.MarineRenewables@gov.scot

Dear Mr MacDonald,

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 AND MARINE LICENCE APPLICATIONS FOR THE BUCHAN OFFSHORE WIND FARM LIMITED - UNDER THE EIA REGULATIONS.

The MCA has reviewed the scoping report provided by Buchan Offshore Wind Farm Limited as detailed in your correspondence of 4th October 2023 and would like to comment as follows:

The Environmental Impact Report should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:

- Collision Risk.
- Navigational Safety.
- Visual intrusion and noise.
- Risk Management and Emergency response.
- Marking and lighting of site and information to mariners.
- Effect on small craft navigational and communication equipment.
- The risk to drifting recreational craft in adverse weather or tidal conditions.
- The likely squeeze of small craft into the routes of larger commercial vessels.

The development area carries a moderate amount of traffic with several important commercial shipping routes to/from UK ports and the North Sea. Attention needs to be paid to routing, particularly in heavy weather so that vessels can continue to make safe passage without large-scale deviations. The likely cumulative and in combination effects on shipping routes should be considered for this project. It should consider the proximity to other windfarm developments, other infrastructure, and the impact on safe navigable sea room.

A Navigational Risk Assessment will need to be submitted in accordance with MGN 654.This NRA should be accompanied by a detailed MGN 654 Checklist which can be found at https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping

A vessel traffic survey will be undertaken to the standard of MGN 654 – at least 28 days which is to include seasonal data (two x 14-day surveys) collected from a vessel-based survey using AIS, radar and visual observations to capture all vessels navigating in the study area. We understand from the information presented in table 13.10 and Section 13.11.2 that in addition to the preliminary assessment planned for summer 2023 and winter 2023/2024, an additional full survey will be carried out to inform traffic analysis for the Intermediate Reactive Compensation (IRC) platform location. This will again be for summer 2023 and winter 2023/2024. It is noted that the 2023 MGN 654 compliant summer surveys are not included at this stage. This data will need to be presented going forward.

We also note that one full year of Automatic Identification System (AIS) data covering the array and Export Cable Corridor (ECC) Search Area for a period within two years prior to Offshore Application submission will be used.

The Development Specification and Layout Plan (DSLP) referred to in 3.6.1.1 and Annex A, EM45, require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.

We note in section 4.4 that a Cumulative Effects Assessment will be carried out in a tiered system of appraisal. As highlighted, the proximity to other offshore windfarms and infrastructure will need to be fully considered, with an appropriate assessment of the distances between OREI boundaries and shipping routes as per MGN 654. Attention must be paid to the traffic for ensuring the established shipping routes within the North Sea can continue safely without unacceptable deviations.

Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location.

In Annex A, EM31, compliance with Regulatory Expectations on Moorings for Floating Wind and Marine Devices (HSE and MCA, 2017) is identified as a designed in mitigation measure for floating infrastructure. This guidance should be followed, and a Third-Party Verification of mooring arrangements will be required.

We note in Section 3.6.4 that: '*Given the early stage of the Proposed Development details on the assembly and the need for possible wet storage of infrastructure is not known at this stage. There is, however, potential that wet storage may be needed to facilitate construction of the Proposed Development, by the Applicant, or ports and / or technology providers.'* we would like to point out to the applicant that any wet storage solutions should be discussed in consultation with relevant maritime stakeholders including MCA and Northern Lighthouse Board (NLB). We would also expect the

Navigation Risk Assessment to be updated to include the proposals for any wet storage once they are known.

Particular consideration will need to be given to the implications of the site size and location on SAR resources and Emergency Response Co-operation Plans (ERCoP). The report must recognise the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)). A SAR checklist will also need to be completed in consultation with MCA, as per MGN 654 Annex 5 SAR requirements.

MGN 654 Annex 4 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report the survey or conduct it to Order 1a might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose.

It is noted in table 3.1, that the use of HVAC and HVDC transmission infrastructure are currently being considered. We would like to remind the applicant when considering this that in the case of HVDC installation, consideration must be given to the effect of electromagnetic deviation on ships' compasses. The MCA would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five degrees will be attained. If an HVDC cable is being used, we may expect the applicant to do a desk based compass deviation study based on the specifications of the cable lay proposed and assess the effect of EMF on ship's compasses. MCA may request for a deviation survey post the cable being laid; this will confirm conformity with the consent condition. The developer should then provide this data to UKHO via a hydrographic note (H102), as they may want a precautionary notation on the appropriate Admiralty Charts (actions at a later stage depending upon the desk-based study and post installation deviation survey).

<u>Section 13.12, Scoping Questions to Consultees Regarding the Shipping and Navigation Chapter</u>

1- Do you agree that the relevant guidance and data sources (including surveys) upon which the assessment should be based have been identified?

   Yes. It is noted however that the 2023 MGN 654 compliant summer surveys are not included at this stage. This data will need to be presented going forward.

2- Do you agree with the proposed shipping and navigation study area and that it is sufficient to capture the relevant impacts?

   Yes

3- Do you agree that all the impacts which will be assessed within the NRA have been identified?

   Yes. All known impacts have been addressed/considered in the NRA.

4- Do you agree with the proposed methodological approach to the NRA and EIA (including impact assessment)?

Yes

5- Do you agree that the outlined embedded mitigation measures are appropriate and likely to sufficiently mitigate potential risks and/or impacts?

Yes.

6- Do you agree that appropriate consultees been identified?

Yes.

7- Do you agree with the proposed approach to considering cumulative impacts?

Yes.

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

Yours sincerely,
[Redacted]

Vaughan Jackson
Offshore Renewables Project Lead
UK Technical Services Navigation

Marine Directorate – Science, Evidence, Data and Digital ("MD-SEDD")

Commercial Fisheries

T: +44 (0)131 244 2500

E: MSS_Advice@gov.scot

Iain MacDonald

Marine Directorate Licensing Operations Team

Marine Laboratory

375 Victoria Road

Aberdeen

AB11 9DB

3 November 2023

Buchan Offshore Windfarm Limited Buchan Offshore Wind Scotwind NE8 Site - Scoping Consultation

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

Commercial fisheries

Data sources

MD-SEDD advise including the 'Gridded fisheries data within Scottish waters for Scottish fishing vessels under 12m overall length – annual averages 2017 to 2021 (SpatialData.gov.scot)' instead of ScotMap data as this is a newer dataset, and Automatic Identification System (AIS) data to supplement the data sources used to inform the EIA.

Impact pathways

MD-SEDD are content with the impact pathways identified and scoped into the EIA for commercial fisheries. However in the Marine Fish Ecology chapter, MD-SEDD do not agree with potential impacts from electromagnetic fields (EMF) being scoped out for the export cable in Table 9.6. MD-SEDD advise that EMF is scoped in for the export cable as there is potential for EMF emissions from both the export cable and inter-array cables.

Assessment methodology

MD-SEDD advise undertaking a commercial fisheries displacement assessment in the EIA to assess the potential impacts of any displacement on fisheries.

Yours sincerely,

Renewables and Ecology Team

Marine Directorate

Marine Laboratory, 375 Victoria Road,
Aberdeen AB11 9DB
www.gov.scot/marinescotland

MD SEDD

Socioeconomics

Scottish Government
Riaghaltas na h-Alba

Buchan Offshore Wind Farm

Science, Evidence, Data and Digital (SEDD[1]) Response
Marine Directorate

The Buchan Offshore Wind Farm scoping report includes descriptions of a range of potential impacts. This response focuses only on the assessment of social and economic impacts.

We recommend that a full Socio-Economic Impact Assessment be scoped into the Environmental Impact Assessment. We provide general advice on how to deliver this at Annex 1.

1. Overview

1.1. Local study areas

We understand that that details of the construction and O&M ports are currently unknown and are unlikely to be selected at the EIA stage. We note that:

"If the port location(s) have yet to be selected, the assessment will develop logic chains of social impacts and potential effects on communities for a range of potential epicentre scenarios. For example, the assessment may consider how the construction, operation and decommissioning of the Proposed Development could result in economic and social impacts if the key ports were in either urban or rural areas. If a short-list of potential port location(s) has been identified, it may be possible to consider social impacts for communities relevant to short-listed locations" (para 17.7, page 452 of the Scoping Report).

We agree with the outlined approach for the local study areas. When looking into different area profiles, consider whether Scottish Government's 6-fold[2] or 10-fold classifications for urban/rural[3] can be used.

[1] As a result of the organisational development in 2023, Marine Scotland has been re-named to Marine Directorate, and Marine Analytical Unit (MAU) was merged with Marine Science to form Science, Evidence, Data and Digital (SEDD) delivery area. This advice on socio-economics comes from what used to be the MAU team.
[2] Scottish Government (2022). Scottish Government Urban Rural Classification 2020. Available at: Overview - Scottish Government Urban Rural Classification 2020 .
[3] Thomson, S.G., Atterton, J., Tiwasing, P., McMillan, J., Pate, L., Vuin, A. and Merrell, I. (2023) Rural and Islands Report: 2023 - An Insights Report. An SRUC output from the NISRIE project funded by the Scottish Government. DOI: Rural and Islands Report: 2023 - An Insights Report.

1.2. Scoping out of Seascape Landscape and Visual Impacts

It is proposed that Seascape Landscape and Visual Impacts are scoped out of the assessment (para 17.4, page 448 of the Scoping Report). We agree with this assessment but would like to highlight that impacts on tourism (resulting from increased activity at ports and harbours, impacts on availability of accommodation, etc) and therefore tourism impacts need to be fully assessed in the EIA report.

1.3. Stakeholder engagement and primary data collection

We appreciate the suggested Stakeholder Engagement Plan (mentioned in para 17.7, page 452 of the Scoping Report) that will include a stakeholder mapping and engagement exercise once initial potential impacts have been identified.

We welcome the developer's intentions to *"monitor and evaluate the properties of the employment supported specifically by the Proposed Development, in conjunction with the reporting requirements for the Contract Position Statement as part of the ScotWind leasing arrangement"* (para 17.7, page 452 of the Scoping Report). We would like to see a more detailed description of what is involved in this work. We would like to highlight that it is a good practice to monitor and evaluate, but post-consent monitoring and evaluation should not be seen as a substitute of the socio-economic impact assessment completed during the consenting process.

With regards to stakeholder engagement, we would like to highlight that stakeholder engagement and primary data collection are different activities with different aims, although could be planned to occur together. We would expect to see the collection of primary social data, where feasible, to provide evidence upon which to base the assessment. We would also expect stakeholder engagement to take place. Stakeholder mapping would be required for both activities.

With regards to engagement with communities post-consent. It would be very helpful for us to see a description of how these communities will be identified, what methods the developer will use to engage and collect primary research data with communities, what methods will be used to capture communities' concerns, and how primary data collected from communities will be analysed. We encourage the developer to engage trained social scientists with experience in qualitative methods to conduct research and primary data collection with communities to ensure that the social science research methods are designed and executed correctly so that the engagement is delivered in as ethical and meaningful way as possible.

1.4. Data sources

Please provide a list of data sources used to assess potential socio-economic impacts (see Annex 1 for examples). Please use the most up-to-date data sources. For example, the GB Day Visitor Survey data from 2019 is mentioned but more recent data is available.

2. Scoping of impacts

2.1. Economic impacts

We broadly agree with the scoping report's proposed approach for assessing economic impacts (page 459 and 460, section 17.10.2.1). It is welcomed that the assessment will include direct, indirect and induced impacts and take account of deadweight, leakage, displacement and substitution. The inclusion of sensitivity analysis to account for risk, uncertainty and optimism bias is also welcomed.

The proposed approach to assessing employment impacts in terms of years of employment and jobs seems appropriate. If it is possible to supply additional information about the types of jobs that are expected to be created (e.g. part-time, full-time, skilled, unskilled etc) and how these compare to the existing jobs in the study area, this will add further depth to the analysis.

We expect to see a detailed description of the methodology used to assess economic impacts in the EIA, including specific details about the methodological approach taken and any key assumptions that underpin any estimates. This may be supplied in a technical annex if necessary.

2.2. Scoping of social impacts

We agree with the proposed list of social impacts to be scoped in, as it aligns with advice provided in the Annex 1 of this scoping response.

2.3. Socio-economic impacts on fisheries

If there are significant changes to commercial fisheries, we would like to see the assessment of the knock-on socio-economic effects. For example, if there is displacement leading to gear conflict, this could lead to drop in income and tensions within community.

3. Conclusions

We broadly agree with the scoping report's proposed approach for assessing economic and social impacts. We also agree with the proposed approach to considering potential local area profiles and a short list of potential locations when assessing social impacts. While agreeing to this approach, we would like to highlight the importance of conducting primary data collection with stakeholders and communities where feasible once local areas can be identified. In the Scoping Report you propose to conduct stakeholder engagement post-consent, with the Stakeholder Engagement Plan submitted during the EIA. We would like to note that stakeholder mapping is necessary for the assessment and can be done prior to locations being known. We would like to encourage the developer to be transparent and explain their methodological choices (how data from stakeholders and communities was collected and analysed) in the EIA application. This information will help us understand whether social impacts have been adequately assessed. We

recommend that you employ a social researcher with qualitative research expertise to collect primary data from communities to understand their responses to potential socio-economic changes resulting from the development.

Annex 1: General Advice for Socio-Economic Impact Assessment
Science, Evidence, Data and Digital (SEDD[4])
Marine Directorate
September 2023

This document sets out some suggestions for delivering socio-economic impact assessment drawing on the professional expertise of the Science, Evidence, Data and Digital (SEDD), Marine Directorate.

Section 1. Some general best practice tips

- Take a proportionate approach to SEIA in line with the size and generating capacity of the development
- Consider offshore and onshore components of the development in the same assessment.
- Employ experts to design and carry out the assessment. The relevant expertise would include:
    - Social research and economist training, qualifications and experience
    - Familiarity and experience with appropriate methods for each discipline (including economic appraisal, social research methods such as surveys, sampling, interviews, focus groups and participatory methods)
- Consider potential secondary socio-economic impacts of any changes the affect the other relevant receptor groups covered in the wider EIA e.g. commercial fisheries, cultural heritage and archaeology and visual impacts.
- Include consideration of the cumulative impact of multiple offshore developments.
- Outline the rationale for scoping out impacts that are deemed to be minimal, including any evidence or analysis that has been used. If this is not provided it can be difficult for SEDD to understand why impacts have been scoped out and we may suggest scoping them back in.

Section 2. Key components of a Socio-economic Impact Assessment

We set out below what we consider to be the key steps to an assessment. We recommend a combined approach so that social and economic impacts are covered together in the assessment, whilst acknowledging that different methodologies for social and economic impacts assessment are needed at certain stages, and that the two disciplines are distinct.

We wish to highlight the importance of stakeholder engagement throughout the assessment, and the use of social research methods to gather primary data and first hand perspectives from particular groups and communities that are affected. These are helpful in order to better understand the nature and degree of impacts that might be caused by changes that are expected occur. A change in itself may or may not bring about tangible impact, impacts may vary for different people or be perceived in

[4]As a result of the organisational development in 2023, Marine Scotland has been re-named to Marine Directorate, and Marine Analytical Unit (MAU) was merged with Marine Science to form Science, Evidence, Data and Digital (SEDD) delivery area. This advice on socio-economics comes from what used to be the MAU team.

different ways, are affected by individual values and attitudes, and conditioned by the context.

Stakeholder engagement and data collection can occur at a number of stages in the SEIA process and may involve similar methodologies but there are important differences to note. The primary aims of stakeholder engagement are to inform, consult or involve key stakeholders, and to communicate information and gather feedback. Data collection, in contrast is a more rigorous analytical process involving:

- Setting out a planned methodology in advance with clear objectives of what you wish to achieve through data collection
- Sampling strategies that take account of the demographic variations in the population and the need to include difficult to reach groups
- Robust methods to collect information from people in a neutral and unbiased way
- Awareness of how data will be analysed and reported on to obtain and disseminate robust conclusions
- Taking account of research ethics including informed consent, and data protection requirements under GDPR

The stages below are divided into the activities that we suggest are **before** the developer submits a request for a scoping opinion and those that are done **after** the scoping phase. We recommend an iterative approach which means that steps inform each other, information is built up over time, and some steps may be repeated or done in a different order.

The key steps should include:

Pre-scoping activities

1) Getting **started:** Employ economist and social research experts and work with them to develop a plan for the SEIA that sets out data requirements, and the proposed social and economic data collection and impact assessment methodologies, timescales, any data protection considerations, risk assessment and ethical issues that might arise from the work.

2) Develop a **detailed description** of the planned development and consider the project phases where socio-economic impacts might be experienced (covering development, construction, operation and maintenance and decommissioning phases). Start to map out potential socio-economic impacts and initial consideration of areas of impact on land that will need to be covered.

3) **Initial scoping of impacts:** develop a broad list of potential impacts informed by experts (including social researcher, economist, local representatives from key groups, community stakeholders and others).

4) Define potential impact areas on land taking into account locations and connections between activities. Different types of impacts may be experienced at different geographic levels, some in the area nearest the landfall or the nearest coastline to the development at sea, and others much further away (at Scotland

level, UK level and internationally). The geographical scale at which social impacts are experienced may be different for social impacts compared with economic impacts. There may be multiple epicentres from which impacts radiate including the site of the development, land-based areas such as landfall and grid connections, construction bases and places from which the development is visible. Activities that take place in the sea are also relevant for defining the impact area on land, for example the location of fishing activity and ports where fish are landed. The definition of the impact area will inform which communities and which sectors are included in the assessment and vice versa, so this exercise needs to be done iteratively with step 3, the initial scoping of impacts.

5) **Stakeholder mapping** is required to identify all the people, groups and stakeholders who may be affected by the development and is a first step in order to conduct effective stakeholder engagement. This exercise is informed by the definition of the impact area. A broad approach is recommended. Stakeholders are likely to include local communities, businesses, workers, other users of the sea, interest groups, community councils and so on.

   Steps 4 and 5 may lead to a change in the list of potential impacts so this will need refined/checked.

6) **Stakeholder engagement (with those affected by the development, sea users, communities etc)** is a key requirement of SEIA that is done at different stages of the process. We recommend doing some initial stakeholder engagement before submitting the scoping report. Stakeholder engagement will fulfil a number of requirements:

   - **Provide information about the development** so that those who might be affected are able to make an informed judgement about potential impacts

   - **Present and refine list of potential impacts based on feedback** - identify impacts that are most relevant and add any additional ones that are identified

   - **Collect initial data/ insights from stakeholders** on what potential socio-economic impacts (to be developed later)

   - **Build relationships** with the community and key groups affected for later stages of the SEIA process so that they can understand the decisions making process and how they can influence it.

   There are many **participatory methodologies** that can be used for effective stakeholder engagement that provide a deliberative space for community discussions.

   This stage may also require the setting up of governance structures and a community liaison officer. **Early engagement** with those who might be affected is very important, as is meaningful and inclusive engagement where people feel that they are being listened to and that their feedback will be acted upon. It is important to set out clearly how stakeholder engagement is being done for the SEIA specifically.

7) **Gather contextual information** to develop a social and economic profile of the area prior to the development that will help with setting the baseline and impact prediction, identifying potential industries and communities that might be affected and sources of data that can be used in the assessment. This might include primary data collection using social research methods (such as surveys, interviews, focus groups) as well as desk based analysis (of existing data sets such as fishing data, population data).

   Primary data collection may occur alongside participatory activities (e.g. engagement events) but must be done in a rigorous and systematic fashion and the findings should be robustly analysed and incorporated into the SEIA. Impacts that are identified for the other receptors in the wider EIA may also have socio-economic consequences and so it may be important to include these in the SEIA.

8) **Produce list of anticipated impacts to be covered in the scoping report** setting out the range of potential impacts that could occur, building on what has already been done using data and insights that have been collected from various activities described above. Details of the methods that have been used should be included to enable Marine Directorate to determine if the analysis is based on a robust and appropriate approach. Justification should be provided for any impacts that are scoped in or out. This could be based on suggestions made by stakeholders and the public during stakeholder engagement or an assessment based on the analysis of primary and secondary data.

   It is helpful if the scoping report includes details on the approach to be used for the SEIA including methods for data collection, planned stakeholder engagement activities and data-sets to be used.

Post scoping activities for the SEIA

The scoping opinion will advise on the final list of socio-economic impacts to be assessed in the SEIA. This may require additional data collection/ social research to enable a more rigorous assessment of a narrower set of anticipated impacts. It may also require further stakeholder engagement in order to check the significance of impacts with different groups, and the acceptability of mitigation options.

The data and information that has been collected throughout the scoping phase will be used to conduct steps 9, 10 and 11 below.

9) **Conduct baseline analysis** to assess the situation in the absence of the development, to provide a point of comparison against which to predict and monitor change. Appropriate social and economic measures should be used for the baseline and cover relevant issues (see section 4 for suggested data sources). Key stakeholders and other interested parties including affected communities and sectors may be aware of baseline data to be included, and this can be explored in the participatory approaches described above. The findings from social research can also be included in the baseline. Note that baseline data can be presented in the scoping report but is also the first stage of the SEIA and so should be included in the SEIA report.

10) **Predict impacts and assess their significance (otherwise known as impact appraisal or options appraisal):** Through analysis, estimate the social and economic changes and their expected impacts, considering any alternative development options and how significant the impacts might be. This is the core part of the assessment and forms the main part of the assessment report. Different methodologies and both primary and secondary data inform this part of the exercise.

Different phases of the development should be covered (development, construction, operation and maintenance) and also transitions between phases (if relevant).

The knock on socio-economic consequences of impacts in other parts of the EIA assessment should be assessed here, such as the impact on commercial fisheries, and impacts on related industries such as tourism could also be included.

It is important to consider distribution of impacts among different social groups (covering protected quality characteristics, socio-economic groups and geographic area where relevant to do so).

Economic impact appraisal should include consideration of:

- Direct, indirect and induced impacts
- Leakage, displacement and substitution effects
- Deadweight
- Cumulative impacts
- Sensitivity analysis to account for risk, uncertainty and optimism bias

There are a range of methodologies for calculating direct, indirect and induced impacts. These include the appropriate use of multipliers, a local content methodology, stakeholder involvement and expert opinion.
Modelling approaches should be realistic, based on robust data, and avoid over promising the economic impacts.
All prices should be presented in real terms (excluding inflation) and should state which year the prices represent.

11) **Development enhancement, mitigation strategy and complete SEIA report.**

There may be an opportunity for adaptation or other approaches to mitigate potentially adverse impacts and to maximise positive opportunities. This may include engagement with the community to develop a strategy for enhancing benefits and mitigating against impacts; or development of a Community Benefit Agreement (CBA). Again these activities should be done collaboratively with stakeholders where relevant and appropriate.

The SEIA report should clearly set out the methods used in the assessment, justification for decision made such as scoping certain impacts in or out of the assessment, and the approach to analysis. The report should cover the baseline

analysis and results of the impact prediction or appraisal, and distributional impacts . Social and economic impacts can be set out separately (where this makes sense) and together where they overlap.

It is good practice for the report to be reviewed by the people (i.e. the wider group of stakeholders and communities) who were involved in providing data for its production.

Section 3. Examples of different types of socio-economic impacts

In the literature social and economic impacts are defined in many different ways. Sometimes social and economic impacts are covered separately, whilst other sources refer to socio-economic impacts.

The following table sets out some commonly identified socio-economic impacts.

Examples of Socio-economic Impacts from Glasson 2017[5]

1. Direct economic:

- GVA
- employment, including employment generation and safeguarding of existing employment;
- characteristics of employment (e.g. skill group);
- labour supply and training; and
- other labour market effects, including wage levels and commuting patterns.

2. Indirect/induced/wider economic/expenditure:

- employees' retail expenditure (induced);
- linked supply chain to main development (indirect);
- labour market pressures;
- wider multiplier effects;
- effects on existing commercial activities (eg tourism; fisheries);
- effects on development potential of area; and

3. Demographic:

- changes in population size; temporary and permanent;
- changes in other population characteristics (e.g. family size, income levels, socio-economic groups); and
- settlement patterns

4. Housing:

- various housing tenure types;
- public and private;

[5] Glasson J (2017a) "Socio-economic impacts 2: Overview and economic impacts" in Therivel R and Wood G (eds.), Methods of Environmental and Social Impact Assessment, Abingdon: Routledge

- house prices and rent / accommodation costs;
- homelessness and other housing problems; and
- personal and property rights, displacement and resettlement

5. Other local services:

- public and private sector;
- educational services;
- health services; social support;
- others (e.g. police, fire, recreation, transport); and
- local authority finances

6. Socio-cultural:

- lifestyles/quality of life;
- gender issues; family structure;
- social problems (e.g. crime, ill-health, deprivation);
- human rights;
- community stress and conflict; integration, cohesion and alienation; and
- community character or image

7. Distributional effects:

Distributional analysis is a term used to describe the assessment of the impact of interventions on different groups in society. Interventions may have different effects on individuals according to their characteristics such as income level or geographical location

- effects on specific groups in society (eg: by virtue of gender, age, religion, language, ethnicity and location); environmental justice

Section 4: Useful Data Sources for Socio-Economic Impact Assessments

Name	Summary	Link to Source
Statistics.gov.scot	Contains a wide range of data by local authority and other geographic breakdowns. Has a search by subject and area option.	statistics.gov.scot
Marine Economic Statistics, 2019	Annual economic statistics publication including GVA and employment data for marine economy sectors.	Scotland's Marine Economic Statistics 2019 - gov.scot (www.gov.scot)

Scottish Sea Fisheries Statistics, 2021	Provides data on the tonnage and value of all landings of sea fish and shellfish by Scottish vessels, all landings into Scotland, the rest of the UK and abroad, and the size and structure of the Scottish fishing fleet and employment on Scottish vessels.	Summary - Scottish Sea Fisheries Statistics 2021 - gov.scot (www.gov.scot)
Scottish Shellfish Farm Production Survey 2021	Statistics on employment, production and value of shellfish from Scottish shellfish farms.	Scottish Shellfish Farm Production Survey 2021 - gov.scot (www.gov.scot)
Scottish Annual Business Statistics 2020	Scottish Annual Business Statistics (SABS) presents estimates of employment, turnover, purchases, Gross Value Added and labour costs. Data are provided for businesses that operate in Scotland. Data are classified according to the industry sector, location and ownership of the business.	Scottish Annual Business Statistics 2020 - gov.scot (www.gov.scot)
Sub-Scotland Economic Statistics Database	The Sub-Scotland Economic Statistics Database provides economic, business, labour market and population data for Scotland, and areas within Scotland.	Sub-Scotland Economic Statistics Database - gov.scot (www.gov.scot)
Nomis Official Labour Market Statistics	Labour market statistics including data on employment, unemployment, qualifications, earnings etc.	Nomis - Official Labour Market Statistics (nomisweb.co.uk)
Economics of the UK Fishing Fleet 2020	Economic estimates at UK, home nation and fleet segment level for the UK fishing fleet. The estimates are calculated based on samples of fishing costs and earnings gathered by Seafish as part of the 2020 Annual Fleet Economic Survey.	Economics of the UK Fishing Fleet 2020 — Seafish

Scotland's Census, National Records of Scotland	Census data that provides information about the characteristics of people and households in the country.	Scotland's Census | National Records of Scotland (nrscotland.gov.uk)
Scottish Index of Multiple Deprivation	Collection of documents relating to the Scottish Index of Multiple Deprivation - a tool for identifying areas with relatively high levels of deprivation.	Scottish Index of Multiple Deprivation 2020 - gov.scot (www.gov.scot)
The Green Book	HM Treasury guidance on how to appraise and evaluation policies, projects and programmes.	The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk)
The Magenta Book	HM Treasury guidance on evaluation. Chapter 4 provides specific guidance on data collection, data access and data linking.	The Magenta Book - GOV.UK (www.gov.uk)
Enabling a Natural Capital Approach (ENCA)	Supplementary guidance to The Green Book. ENCA resources include data, guidance and tools to help understand natural capital and know how to take it into account.	Enabling a Natural Capital Approach (ENCA) - GOV.UK (www.gov.uk)

Section 5: Further sources of guidance:

HM Treasury guidance on how to appraise and evaluate policies, projects and programmes: The Green Book: appraisal and evaluation in central government

Best practice in Social Impact Assessment according to the International Association for Impact Assessment: Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects

The project A two way Conversation with the People of Scotland on the Social Impacts of Offshore Renewables (CORR/5536) has developed elements of a conceptual framework on social values that can be used to support and inform existing processes for assessing the potential social impacts of offshore renewables plans: Offshore renewables - social impact: two way conversation with the people of Scotland

Best practice guidance for assessing the socio-economic impacts of OWF developments: Guidance on assessing the socio-economic impacts of offshore wind farms (OWFs)

MD-SEDD

Physical Processes

Scottish Government
Riaghaltas na h-Alba
gov.scot

E: MD-SEDD-RE_Advice@gov.scot

Iain Macdonald
Marine Directorate Licensing Operations Team
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

30 November 2023

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

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

Physical environment / coastal processes

MD-SEDD agrees that transboundary physical process impacts can be scoped out, and welcomes the proposed cumulative impact assessment. MD-SEDD agrees that the assessment of potential impact on mixing and stratification is important and welcomes that it is now scoped into the EIA, specifically the *qualitative* assessment of impact on seasonal stratification and the Buchan front. The MD-SEDD agrees that the relevant structures to investigate are the floating WTGs and substation platform. The stratification in the region should be well characterised by the use of observations and existing freely available 3D model output (see comments below). MD-SEDD advise that the current lack of methodologies and tools available to applicants, the proposed qualitative assessment approach is considered to be adequate and proportionate.

The scoping report outlines the assessment methodology in section 6.10.2 but it is not clear what "coastal processes" are considered to be important and how they will be assessed. MD-SEDD advise that this is made clear

Response to scoping questions from the applicant:

"Are there any guidance or data sources that should be considered which haven't been identified as part of this scoping study?"

MD-SEDD advise the use of existing 3D model output of temperature and salinity in order to describe stratification in the study area (magnitude, extent, timing) and to characterise the Buchan front. The northwest European shelf reanalysis model runs available on Copernicus Marine (e.g. https://doi.org/10.48670/moi-00059 and https://doi.org/10.48670/moi-00054), or Scottish Shelf Model (https://marine.gov.scot/themes/scottish-shelf-model) would be sensible model choices. Note there is a climatology available from the Scottish Shelf Model (widely used by the aquaculture industry) which could be used, but there is also a 27 year reanalysis available from the Scottish Shelf Waters Reanalysis Service (https://tinyurl.com/SSW-Reanalysis) that can be used to study inter-annual variability (and how this might compare with potential impacts).

"Do you agree that the scoping study has included all the receptors and impacts relevant for physical and coastal processes across the study areas?"

Yes, the relevant receptors are scoped in the proposed impact assessments are proportionate.

"A 2D numerical modelling approach is proposed to support the assessment of baseline conditions, and then the subsequent assessment of impacts upon those conditions and the wider physical environment. These models will be validated against measured datasets derived from public data records and site-specific surveys - do you agree that this approach, in tandem with the review of available scientific literature and other project examples as well as other relevant public data that may become available) is reasonable and sufficient for performing the assessment?"

The proposed coupled 2D hydrodynamic-wave model setup is considered suitable for the proposed use and assessment methodology. Validation could also be performed against other model data, e.g. the northwest European shelf reanalysis model runs available on Copernicus or the Scottish Shelf Model.

Yours sincerely,

Renewables and Ecology Team
Marine Directorate – Science, Evidence, Data and Digital

Marine Laboratory, 375 Victoria Road,
Aberdeen AB11 9DB
www.gov.scot/marinescotland

Ministry Of Defence

Defence Infrastructure Organisation

From:	DIO-Safeguarding-Wind (MULTIUSER)
To:	MD Marine Renewables
Subject:	RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Date:	06 November 2023 13:35:08
Attachments:	image001.png

Good afternoon Iain,

I am sorry in the delay in MOD response but we are still awaiting some assessments. The MOD will be submitting a response as soon as possible. I appreciate that the scoping deadline as passed but I would appreciate if when our response is ready you will pass it on to the developer. I can confirm that to date our assessment has identified concerns that the development is Radar Line Of Sight for Air defence Radar at RRH Buchan, unfortunately I cannot complete the response today as I am still waiting for some responses from other Subject Matter Experts.

Kindest Regards

Teena Oulaghan | Safeguarding Manager
Defence Infrastructure Organisation
Estates | Safeguarding
DIO Head Office | St George's House | DMS Whittington | Lichfield | Staffordshire | WS14 9PY
[Redacted]
Email: teena.oulaghan100@mod.gov.uk

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 06 November 2023 12:22
To: MD.MarineRenewables@gov.scot
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

Please note that the consultation period for the above application concluded on the 03 November 2023. As MD-LOT did not receive a response from you by this deadline, we have assumed a nil response.

Kind regards
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

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From: MD Marine Renewables
Sent: Wednesday, October 4, 2023 2:00 PM
To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Cc: John Mckay <John.Mckay@gov.scot>; Kirsty Black <Kirsty.Black@gov.scot>
Subject: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
(collectively referred to as the "EIA Regulations").

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Buchan Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at:
https://marine.gov.scot/node/24504

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment ("EIA") Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project**. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

Please submit your response electronically to MS.MarineRenewables@gov.scot by **03 November 2023**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Many thanks,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

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Moray Council

ECONOMY, ENVIRONMENT AND FINANCE
Andrew Miller
Senior Planning Officer
Moray Council
Po Box 6760 Elgin Moray IV30 1BX
Telephone: 01343 563274 Fax: 01343 563990

E-mail: andrew.miller@moray.gov.uk
Website: www.moray.gov.uk

Your reference: SCOP-0031
Our reference: 23/01783/S36SCO/AM/LMC

Iain MacDonald
Marine Licensing & Consenting Casework Officer
Licensing Operations Team
Marine Directorate
Scottish Government
Marine Laboratory
Victoria Road
Aberdeen
AB11 9DB

Emailed to:
MS.MarineRenewables@gov.scot

27 October 2023

Dear Sir

RE: REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (collectively referred to as the "EIA Regulations").

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

I refer to your recent request for comments on the scoping request received by the Scottish Government in respect of the above under the EIA Regulations.

Having reviewed the submitted information, I can confirm that Moray Council have no comments to make on this scoping request.

Should you require any further information please do get in touch with me on the details at the top of this letter.

Yours faithfully
[Redacted]

Andrew Miller
Senior Planning Officer

National Air Traffic Services

From:	AULD, Alasdair E
To:	MD Marine Renewables
Cc:	NATS Safeguarding; MD Marine Renewables
Subject:	RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023 [SG31443]
Date:	05 October 2023 09:38:59
Attachments:	image001.png

Iain

NATS has been working with the developer at the pre-planning stage and is pleased to note that our concerns are to be included in the scope of the EIA for the proposed project.

We will continue to work with them to explore these issues and develop mitigation options if appropriate.

Regards,

Alasdair

NATS Safeguarding

NATS Internal

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 04 October 2023 14:00
To: MD.MarineRenewables@gov.scot
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: [EXTERNAL] SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
(collectively referred to as the "EIA Regulations").

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Buchan Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at:
https://marine.gov.scot/node/24504

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Please submit your response electronically to MS.MarineRenewables@gov.scot by **03 November 2023**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Many thanks,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

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****
*****

NatureScot

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

Iain MacDonald
Marine Licensing & Consenting Casework Officer
Marine Directorate - Licensing Operations Team
Scottish Government - Marine Laboratory
Aberdeen
AB11 9DB

17 November 2023

Our ref: CNS / REN / OSWF / NE8 – Buchan – Pre-application

By email only: ms.marinerenewables@gov.scot

Dear Iain

Buchan Offshore Wind Farm – ScotWind NE8

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

Thank you for consulting NatureScot on the EIA Scoping Report submitted by Buchan Offshore Wind Farm Limited for the Buchan Offshore Wind Farm Array and Export Cable Corridor (ECC) Search Area.

Our advice on the natural heritage interests to be addressed within the Environmental Impact Assessment Report (EIA Report) is outlined below. Please note that the advice contained in this letter is in relation to the offshore components (seawards of Mean High Water Springs) only.

Policy context

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

Proposal

The proposal uses a project design envelope approach[1] and comprises of:

[1] https://www.gov.scot/publications/guidance-applicants-using-design-envelope-applications-under-section-36-electricity-act-1989/

- Up to 70 floating wind turbine generators (WTGs) with a generating capacity of up to 1 GW.
- The preferred WTG foundation is the BW Ideol patented 'Damping Pool', a square ring-shaped hull with a large central opening. Alternative WTG foundations under consideration include floating semi-submersible, spar buoy and tension leg platform.
- The preferred mooring system for this foundation is a catenary mooring system, up to 9 mooring lines for each platform with a maximum mooring length of between 700 – 2000m may be required.
- Anchoring systems being considered include suction pile, drilled piles, driven piles and drag embedment anchors.
- A maximum blade tip height of 355m above mean sea level and a minimum blade tip clearance of at least 30m above mean sea level.
- Up to 3 Offshore Substation Platforms (OSPs) with associated substructures (including monopiles and jackets) and foundations (driven piles, drilled piles and suction piles).
- Dynamic inter-array cabling.
- Up to 3 export cables.
- Ancillary elements such as scour and cable protection.
- 1 Intermediate Reactive Compensation (IRC) platform located within the ECC Search Area.
- A grid connection anticipated to be in the Peterhead region, as identified through the Holistic Network Design Follow-Up Exercise.

Content of the Scoping Report

We are generally content with the EIA Scoping Report, which is well laid out and easy to navigate.

Assessment approach

The EIA Report should consider the impact of all phases of the proposed development on the receiving environment, including effects from pre-construction activities as well as the construction, operation and maintenance and decommissioning phases. We recommend that the following aspects are considered further and included in the EIA Report.

Ecosystem assessment

Increasingly, there is a need to understand potential impacts holistically at a wider ecosystem scale in addition to the standard set of discrete individual receptor assessments. This assessment should focus on potential impacts across key trophic levels particularly in relation to the availability of prey species. This will enable a better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance from the development of the wind farm on seabird and marine mammal (and other top predator) interests and what influence this may have on population level impacts.

Climate change and carbon costs

The impact of climate change effects should be considered, both in futureproofing the project design and how certain climate stressors may work in combination with potential effects from the proposed wind farm. The EIA Report should also consider the carbon cost of the wind farm (including supply chain) and to what extent this is offset through the production of green energy. We recognise that some aspects of this are addressed in Section 19 (Climate Effects).

Blue carbon

In addition to the climate change assessments outlined in Section 19 of the EIA Scoping Report, we recommend that consideration is given to impacts on blue carbon and whether or not an assessment can be undertaken. This should expand on the information and assessment conducted for benthic ecology to focus on the potential impacts of the proposed development on marine sediments. This assessment should be in respect of the wind farm and associated cabling.

Cumulative impact assessment

We are concerned with the likelihood of multiple offshore export cables making landfall in the area around Peterhead and the potential for cumulative impacts arising from construction and associated geophysical, geotechnical and environmental survey programmes. Therefore, we recommend that this is considered further. We have also raised the need for strategic consideration by both Scottish Government (Offshore Wind and Marine Directorates) and the Electricity System Operator (ESO).

Wet storage

Section 3.6.4 refers to the potential for wet storage of substructures prior to and during integration with the WTGs. Specific requirements and potential wet storage locations are not detailed within the Scoping Report.

Wet storage could represent a significant impact. Consideration of the potential impacts on all receptors needs to be addressed, however we are aware that Marine Directorate are currently considering consenting routes and processes around wet storage. We would welcome further discussion on this as and when further details are available.

Environmental Impact Assessment Report (EIAR)

The EIA Report provides the assessment to support the application and should be suitability structured, with appropriate formatting and proportionality to ensure it can be reviewed efficiently and effectively. Consideration should therefore be given to the following aspects:

- It should clearly follow the direction provided in the Scoping Opinion, or where specific agreement was later reached during the pre-application process. Any divergence from this needs to be laid out separately and must be fully justified.
- Consideration should be given to the volume and flow of information within and across each receptor chapter and associated technical appendices. The flow of information relating to impact pathway, assessment and conclusions should be concise, but not omit key information on steps taken. Repeated duplication of text should be avoided through appropriate structuring.
- In electronic versions the EIA Report, navigational aids including use of hyperlinks etc. are required, particularly where there are supporting technical appendices to any chapters.
- Each stage of the assessment process should be sufficiently transparent to allow the assessments to be repeated. Where specific tools have been used, details of which version and when the assessment was carried out is required.

Habitats Regulations Appraisal (HRA)

Consideration of the first stage of HRA – LSE Screening report has not been provided alongside the Scoping Report, this will be submitted separately. We request that a report is produced and submitted for comment at the earliest opportunity.

Positive Effects for Biodiversity/ Biodiversity Net Gain

We recommend early consideration of potential Positive Effects for Biodiversity as well as nature inclusive design aspects at an early stage and following through into the EIA Report. We acknowledge that, whilst not policy, these aspects form part of our ability to address both the climate and biodiversity crises and as such we encourage developers to consider this as part of their application.

Mitigation

We welcome the identification of 'embedded mitigation measures' described in Section 3.8 and in each of the relevant sections of the EIA Scoping report (for example Section 6.6) and summarised in Appendix A (Mitigation Commitment Register).

However, much of the embedded mitigation detailed throughout includes the development and adherence to post-consent plans/programmes. Plans do not strictly constitute mitigation; as it's the measures contained within the plan that will mitigate impacts. The EIA Report must clearly articulate those mitigation measures that are informed by the EIA and are necessary to avoid or reduce predicted significant adverse environmental effects of the proposed development. We advise that the full range of mitigation and monitoring measures, and published guidance, are considered and discussed in the EIA Report.

Natural Heritage interests to be considered

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

- Advice on marine ornithology is provided in **Appendix A**.
- Advice on marine mammals is provided in **Appendix B**.
- Advice on fish and shellfish ecology is provided in **Appendix C**. (Noting that for diadromous fish we have limited our advice to the requirements for these to be considered as part of the EIAR only – further advice is contained within the appendix).
- Advice on benthic ecology is provided in **Appendix D**.

For the following receptors, we advise:

- Seascape, Landscape Character and Visual Impact assessment (SLVIA) – we agree that this topic can be scoped out. This is due to the distance of the array from shore and the small scale nature of the Intermediate Reactive Compensation Platform (IRC).
- Physical processes – unfortunately we are unable to provide any specific advice in respect of the landfall or wider physical processes due to staff resourcing. We guide the developers to the following resource – Dynamic Coast[2] which may be of assistance when designing the landfall and associated infrastructure. Also noting our comments above around cumulative concerns from the number of proposed landfalls in and around the Peterhead area.

[2] https://www.dynamiccoast.com/

Further information and advice

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

Please contact me in the first instance for any further advice, using the contact details below, copying to our marine energy mailbox – marineenergy@nature.scot.

Yours sincerely,

Clare McCarty

Marine Sustainability Adviser – Sustainable Coasts and Seas

clare.mccarty@nature.scot

NatureScot advice on EIA Scoping Report for the Buchan Offshore Wind Farm

Appendix A – Offshore Ornithology

Offshore and intertidal ornithological interests are considered in Section 10 of the EIA Scoping Report. Embedded mitigation measures and impact pathways are further summarised within the Scoping Report Appendix A - Mitigation Register and Appendix B - Impacts Pathway Register.

Scoping questions to consultees have been set out in Section 10.11 of the Scoping Report, within our advice below we have used text boxes to clearly identify each of these questions.

Study area

Do you agree with the study area defined for offshore and intertidal ornithology?

We agree with the study area as defined in Section 10.4 and Figure 10.1 is appropriate. The study area comprises the array area, the Export Cable Corridor (ECC) search area and a 4km buffer (up to Mean High Water Springs (MHWS) for the ECC).

Site-specific Digital Aerial Surveys (DAS) commenced in March 2022 and are anticipated to complete in February 2024. The survey area includes the array area and a 4km buffer, we are broadly content with the methods used for DAS although note that survey coverage is at the lower end of the scale. We are content that a 4km buffer is appropriate given the offshore location of this site.

For the ECC, nearshore baseline surveys have been commissioned in areas where there is expected to be landfall activities. These surveys have been commissioned for 2 years from September 2022 to September 2024. Section 10.10.1 outlines the methodology used which involves walk-over surveys at the coast. We previously provided advice on the ornithology methodology strategy document submitted in April 2023. In reviewing the method again, we request the following:

- Information on the survey methodology including; whether the scanning is always done in one direction, duration of scans, optics used etc.
- How seaducks and divers will be accounted for.
- How location data is collected and information on the precision of this data e.g. (was this data collected using laser-range finders or rangefinder sticks etc.)
- The raw data from the survey with details of the tidal state and speed and time of day (this will be required in the EIA application).

This will help us understand better the methodology for counting and mapping birds at the landfall.

Baseline characterisation and approach to assessment

Data sources

Do you agree with the use of those data listed in section 10.5, and any additional anticipated data listed in section 10.10, being used to inform the Offshore EIA? Are there any additional data sources or guidance documents that should be considered?

The data sources listed in Sections 10.5 and 10.10 are appropriate and will provide useful contextual information.

In addition to the data sources included in Table 10.2 (Section 10.5.1), we also recommend that the following reference be considered as an important baseline data source:

- Buckingham, L., Bogdanova, M.I., Green, J.A., Dunn, R.E., Wanless, S., Bennett, S., Bevan, R.M., Call, A., Canham, M., Corse, C.J. and Harris, M.P., 2022. Interspecific variation in non-breeding aggregation: a multi-colony tracking study of two sympatric seabirds. Marine Ecology Progress Series, 684, pp.181-197[3].

Key species

Do you agree that all receptors related to offshore and intertidal ornithology have been identified, and that the preliminary list of key species (section 10.5.2) is appropriate?

We note that the first year of DAS data has been used to develop the preliminary list of key species, as shown in Table 10.3 and discussed throughout Section 10.5.2.1. We advise that no species should be scoped out on the basis of incomplete DAS survey data and that all survey work should be completed prior to deciding which species are taken forward for assessment.

Results from the first year of DAS, outlined in Section 10.5.2.1, show that the following species were recorded as most abundant: guillemot, fulmar, puffin, kittiwake, gannet, herring gull, razorbill and great black-backed gull.

We note that all auk species have been reported but no reference has been made to auk ID rates. There have been issues regarding the proportion of identified auks from DAS in recent casework due to changes in DAS providers methods for identifying auks. This could have consequent impacts on how the abundance data is treated in the application. In order to assess the EIA and HRA application, a clear audit of the proportion of identified and unidentified auks should be provided.

Calculation of abundance and density estimates

We consider the method for accounting for records not identified to species level, as described in Section 10.10.2, to be appropriate and in line with industry standard. However, we note that the appropriateness of this approach depends on the identification rates from the survey. In some recent casework we have seen high numbers of unidentified auks which makes any consequent calculations of proportions less robust.

Section 10.10.2 outlines that both design-based methods and MRSea will be used to determine species densities. We support the use of MRSea where possible and design-based methods where MRSea cannot be used.

[3] https://www.researchgate.net/publication/356629936_Interspecific_variation_in_non-breeding_aggregation_a_multi-colony_tracking_study_of_two_sympatric_seabirds

Availability bias will require correction using species specific correction factors. The key references that should be used to derive correction factors have been correctly identified: Thaxter et al. (2010)[4] for guillemot and razorbill, and Spencer (2012)[5] for puffins.

We are aware that there is an industry led contract with University of Liverpool looking at availability bias for guillemot and razorbill. This work is due to report at end of March 2024 and may result in an update to our guidance based on the findings.

Collision risk modelling (CRM)

Given the requirement for collision risk modelling to be run using Option 3, could confirmation be provided on the input parameters to be used (not specified for Option 3 models in NatureScot (2023f) guidance), and how site-specific avoidance rates should be calculated (as advised in the NatureScot (2023f) guidance for Option 3 models).

The approach to CRM, as set out in Section 10.10.2, is in line with our current guidance as per Guidance Note 7[6]. However, we advise that we no longer require Option 3 models to be run. We will be updating our guidance shortly to reflect this change in our advice. Please note that, we do still expect deterministic outputs for each collision risk species as well as stochastic outputs for Option 2.

Avoidance rates presented in Table 10.6 are those included within our Guidance Note 7. Please, note that we are currently reviewing our avoidance rate guidance in light of the Ozsanlav-Harris et al. (2023)[7] review.

In addition, we note that there may also be particular considerations for floating turbines as semi-submersible floating wind turbines could also act as an attractant by providing suitable roosting or resting areas for birds, which could increase the risk of collisions. This should be considered in within the EIA Report.

Displacement analysis

The process set out for the displacement analysis is appropriate and follows our guidance. Displacement and mortality rates presented in table 10.7 are correct following our guidance set out within Guidance Note 8[8].

Do you agree with the list of species proposed for assessments using collision risk modelling and displacement analysis.

[4] Thaxter, C.B., Wanless, S., Daunt, F., Harris, M.P., Benvenuti, S., Watanuki, Y., ... & Hamer, K.C. (2010). Influence of wing loading on the trade-off between pursuit-diving and flight in common guillemots and razorbills. Journal of Experimental Biology. 213(7): 1018-1025.

[5] Spencer, S. M. (2012). Diving behavior and identification of sex of breeding Atlantic puffins (Fratercula arctica), and nest-site characteristics of alcids on Petit Manan Island, Maine

[6] https://www.nature.scot/doc/guidance-note-7-guidance-support-offshore-wind-applications-marine-ornithology-advice-assessing

[7] Ozsanlav-Harris, L., Inger, R. & Sherley, R. 2023. Review of data used to calculate avoidance rates for collision risk modelling of seabirds. JNCC Report 732, JNCC, Peterborough, ISSN 0963-8091.

[8] https://www.nature.scot/doc/guidance-note-8-guidance-support-offshore-wind-applications-marine-ornithology-advice-assessing

Species will be selected for CRM and displacement analyses based on species abundance within the survey area, following the full two years of data collection, and with reference to Furness and Wade (2013). We are content with this approach to defining the species list for the CRM and Displacement analysis, as outlined in Section 10.10.2.

Assessment of migratory birds

We advise that potential collision risk to migratory species should be assessed following the updated review of migratory routes and vulnerabilities across the UK[9]. This work also includes development of a stochastic migration CRM tool (known as mCRM) to enable quantitative assessment of risks to migratory SPA species including swans, geese, divers, seaduck and raptors. The updated review is now available and its associated mCRM tool should be used - this is likely to be available shortly.

Definition of seasons and regional population estimates

We welcome the use of NatureScot guidance to define seasonal periods. Regional seabird breeding season population estimates will be derived from Seabird Monitoring Programme data, and non-breeding regional population estimates will be derived from BDMPS (Furness, 2015)[10]. We advise that where Furness seasons overlap with NatureScot breeding seasons, Furness seasons should be foreshortened.

Further discussion will be needed to finalise the approach with respect to birds who largely remain in the northern North Sea during the non-breeding season. At present, if non-breeding season assessment of displacement of guillemot is required, then we would wish to see the non-breeding season population defined in terms of the mean maximum foraging range (Woodward et al. 2019)[11].

Population Viability Analysis (PVA)

We note and support the intention to use the Natural England PVA tool (Searle et al. 2019) as well as the intention to undertake PVA where baseline mortality will increase by 0.02%.

Demographic rates will be derived from Horswill and Robinson (2015)[12]. Modelling will be undertaken for 25, 50 and 60 years, with both the counterfactual of Growth Rate and the Counterfactual of Population Size presented. We agree with this proposed approach.

We also advise that, if required survival rates for great black-backed gull are taken as for herring gull, as presented in Horswill and Robinson (2015), then juvenile herring gull survival rate should be used for juvenile great black backed gull, and an average survival for juvenile and adult herring gull used for immature great black-backed gull.

[9] https://www.gov.scot/publications/strategic-study-collision-risk-birds-migration-further-development-stochastic-collision-risk-modelling-tool-work-package-1-strategic-review-birds-migration-scottish-waters/

[10] Furness, R.W. (2015). Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS). Natural England Commissioned Reports, Number 164.

[11] Woodward, I., Thaxter, C.B., Owen, E. & Cook, A.S.C.P. (2019). Desk-based revision of seabird foraging ranges used for HRA screening. BTO research report number 724.

[12] Horswill, C. & Robinson R. A. 2015. Review of seabird demographic rates and density dependence. JNCC Report No. 552. Joint Nature Conservation Committee, Peterborough.

Highly Pathogenic Avian Influenza (HPAI)

We note that the scoping report makes no mention of the recent outbreak of HPAI. We acknowledge that HPAI is an ongoing mortality event and at this point it is challenging to quantify impacts on populations. The NatureScot Scientific Advisory Committee Sub-group on Avian Influenza has produced a report on the H5N1 outbreak in wild birds 2020-2023[13]. This report highlights priorities for 2023 and beyond, including how critical it is that monitoring and research continue during this outbreak in order to investigate interactions between HPAI and other drivers of population changes, such as wind farm effects.

Seabird colony counts to assess impacts of HPAI are being carried out on a range of sites throughout Scotland during the 2023 breeding season and are likely to be continued over the next few years. Results from these will be crucial in helping to develop guidance on how to consider HPAI in assessments. We advise that HPAI is considered in the EIA Report.

Sectoral Marine Plan

Section 10.5.2.4 of the Scoping Report refers to the Appropriate Assessment for the Sectoral Marine Plan option areas and states that this concluded there would be no adverse effects on site integrity (AEoSI) from Plan Option NE8. We note that it is possible that the current iterative plan review could change this conclusion, in which case the potential for a derogation case may require consideration.

Do you agree with the proposed assessment methodology for offshore and intertidal ornithology, including those for transboundary effects and cumulative effects?

Noting our advice above regarding baseline characterisation and approach to assessment, we are content with the proposed approaches as outlined in Section 10.10.2.

Potential impacts

Do you agree with the scoping in and out of impact pathways in relation to offshore and intertidal ornithology?

In general terms the standard pathways of collision, disturbance, displacement and barrier effects have been captured within Section 10.7.

Disturbance from vessels moving from port to array area during construction should be considered, should they be expected to transit through an SPA (e.g. Moray Firth SPA). This should be considered within the assessment for ornithology.

With respect to nocturnal species, we consider that the impacts of lighting on ornithological receptors is not considered sufficiently within the Scoping Report. There is no mention of the potential effects of lighting attraction with respect to species such as European storm petrels, Leach's storm-petrels and Manx shearwaters. This should be recognised as presenting additional

[13] NatureScot (2023) NatureScot Scientific Advisory Committee Sub-Group on Avian Influenza Report on the H5N1 outbreak in wild birds 2020-2023. Available at: https://www.nature.scot/doc/naturescot-scientific-advisory-committee-sub-group-avian-influenzareport-h5n1-outbreak-wild-birds

potential risk to these species; in particular attraction to turbine lighting and/or lighting on vessels could impact assessment of both displacement and collision risks. We recognise at this point that this can only be assessed qualitatively and will be dependent on species presence and densities within the study area.

Cumulative impacts

Section 10.8 notes the intention to use the Cumulative Effects Framework (CEF) if available within the assessment timeframe. We support the use of the CEF, which is to be published by Marine Directorate.

As outlined in Section 10.8, projects to be included within the Cumulative Impact Assessment (CIA) will be derived from Mean Max foraging range +1SD as defined in Woodward (2019). We advise that the final list of projects to be considered for inclusion within the CIA should be agreed with Marine Directorate and clearly articulated in the EIA Report.

Please note that if an application is to be submitted prior to a decision regarding the Berwick Bank application, we will require two parallel cumulative assessments to be carried out - one with and one without Berwick Bank. We recently concluded that the Berwick Bank application would have an adverse effect on site integrity (AEoSI) on multiple seabird species within the UK European Site Network, some of which overlap with the species and sites likely to require assessment for this application. Due to this conclusion and the unknown outcome of the Berwick Bank application at present, we anticipate that multiple PVA models should be run, with and without Berwick Bank.

Mitigation and monitoring

Do you agree that the embedded mitigation outlined is suitably relevant to offshore and intertidal ornithology?

We welcome the embedded mitigation measures described in Section 10.6 and Appendix A - Mitigation Commitment Register. The proposed measures seem appropriate, but we would expect these to be kept under review as the assessment and development progresses. We advise that the full range of mitigation measures and published guidance is considered and discussed in the EIA Report.

We note that no specific monitoring for offshore ornithology is mentioned within the Scoping Report. Further information on proposed ornithological monitoring should be discussed in the EIA Report.

Transboundary impacts

We agree that due to the foraging ranges, transboundary impacts are likely to be negligible during the breeding season. However, we advise that any decisions regarding this are set out in the EIA Report with a clear audit and justifications to any conclusions.

We also agree that there is potential for transboundary effects to birds originating from non-UK colonies during the non-breeding season. We support the intention to consider transboundary impacts within the EIA for those non-UK colonies with connectivity, as noted in Section 10.9.

NatureScot advice on EIA Scoping Report for the Buchan Offshore Wind Farm

Appendix B – Marine Mammals

Marine mammals are considered in Section 11 of the EIA Scoping Report. Embedded mitigation measures and impact pathways are further summarised within the Scoping Report Appendix A - Mitigation Register and Appendix B - Impacts Pathway Register.

Scoping questions to consultees have been set out in Section 11.12 of the Scoping Report, within our advice below we have used text boxes to clearly identify each of these questions.

Study area

Do you agree with the study areas defined for Marine Mammals and other Megafauna?

We advise the following:

- Array marine mammal study area – defined by the array site boundary plus a 4km buffer as used in the site-specific digital aerial survey campaign; and
- Regional marine mammal study area – a much wider area of the North Sea, defined by relevant species Management Units (MUs), including:
    - Celtic and Greater North Sea MU;
    - North Sea MU; and
    - Relevant SCANS-IV block.

Baseline characterisation

Do you agree with the guidance documents (section 11.2.3) and data sources (section 11.5.1) proposed? Are there any additional data sources that should be considered?

We agree with the list of guidance documents identified in Section 11.2.3. In addition, we suggest the following:

- Unexploded Ordnance Clearance Joint Interim Position Statement[14]. We are aware that this is currently being refreshed. In addition, due to the successful use of low order deflagration techniques in the Moray Firth at the Moray West wind farm, we are currently discussing with Marine Directorate any further guidance relevant to future UXO campaigns in Scottish waters.
- We also recommend consideration of recently published reports:
    - Reducing Conservatism in Underwater Noise in assessment for Offshore Wind (ReCON)[15]; and
    - Energy Conversion Factors in Underwear Radiated Sound from Marine Piling – Review of the method and recommendations[16]. We note that the developers are

[14] *Marine environment: unexploded ordnance clearance joint interim position statement (published 2021): https://www.gov.uk/government/publications/marine-environment-unexploded-ordnance-clearance-joint-interim-positionstatement*

[15] https://www.carbontrust.com/our-work-and-impact/guides-reports-and-tools/reducing-uncertainty-in-underwater-noise-assessments-for-offshore-wind-recon

[16] https://www.gov.scot/publications/energy-conversion-factors-underwater-radiated-sound-marine-piling-review-method-recommendations-2/documents/

intending to use the INSPIRE model in which case this document and any guidance is less likely to be relevant.

We are also aware of the ORJIP project on the Range dependent nature of impulsive noise – analysis of existing data and development of method for incorporation into noise impact assessments (RaDIN), this project is underway and should be referenced if published in time to support the EIA Report.

In addition to the above, we note that figures included within Section 11.5.1 refer to Waggit et al. (2020)[17] but notice this reference is omitted from Table 11.2.

Furthermore, when considering reference populations we advise that instead of using the Inter-agency Marine Mammals Working Group (IAMMWG) Management Units (MU), which extend beyond UK waters, a proportion is calculated based on the UK portion of the relevant MU for each species. This is due to the MUs covering areas beyond the UK, and better reflects the likely size of populations affected by the potential impact pathways.

Potential impacts

Do you agree with the scoping in and out of impact pathways in relation to Marine Mammals and other Megafauna?

Table 11.3, Section 11.7, summarises the impacts to be scoped in and scoped out of the assessment for marine mammals and other megafauna. We agree with these conclusions.

Approach to assessment

Do you agree with the proposed assessment methodology, including those for potential cumulative effects?

Density estimates

Section 11.11.1 describes the proposed approach to generating marine mammal density estimates. In our view, Section 11.11.1 implies that the most conservative density estimates will only be used for harbour porpoise, however, we would expect this approach to be followed for each species. We advise that, unless the sites specific DAS density estimate is calculated to be a higher value, data from SCANS IV is used for the density estimates for each species.

Underwater noise

The proposed methodology for assessing potential impacts from pile driving is described in Section 11.11.2 and it is intended to use the INSPIRE model. We note that the described approach includes integrating a description of the spatial distribution of marine mammals with piling noise spatial distributions. We would like to clarify that it is the density estimate (most precautionary available) that should be overlapped with modelled noise/impacts to give an estimate of the number of animals potentially impacted, rather than the spatial distribution. This is because of the mobile nature of marine mammals.

[17] Waggitt et al. (2020) Distribution maps of cetacean and seabird populations in the North-East Atlantic. *J Appl Ecol.* 2020; 57: 253-269. https://doi.org/10.1111/1365-2664.13525)

We recommend the use of Southall et al. (2019) for Permanent Threshold Shift (PTS) / Temporary Threshold Shift (TTS) thresholds, as well as the application of dose response curves (Graham et al. 2017, 2019 for cetaceans and Whyte et al 2020 for seals) for disturbance to all species of marine mammal. In addition, we advise the applicant to follow JNCC and NPL guidelines on minimising the risk of injury to marine mammals.

Cumulative effects

We welcome the intended use of iPCoD (interim Population Consequences of Disturbance) where likely significant effects cannot be ruled out through non population modelling approaches. The iPCoD is also incorporated into the Cumulative Effects Framework, which should be used if published by Marine Directorate prior to an application submission.

We consider the bullet points listed within Section 11.8 to imply that only projects that fall within the identified 'Zone of Influence' (which itself is determined by worst-case noise contours of the project) would be included in the cumulative assessment. However, the last paragraph of Section 11.8 states that projects anticipated to be included in the cumulative assessment are Offshore Wind Farms in the Moray Firth and potentially the Forth and Tay area. We would expect the applicant's approach to consider cumulative impacts in the context of spatial and temporal scales. As such, this may mean a different list of projects to be included in the cumulative assessment than currently identified.

Consideration of cumulative effects should be extended to incorporate the export cable corridor (construction and decommissioning phases), specifically within the Southern Trench MPA with respect to potential impacts to minke whale, as well as nearshore waters for consideration of impacts to bottlenose dolphins which are a qualifying interest of Moray Firth SAC and known to commute along the east coast.

Agreement on projects to be considered cumulatively with Buchan Offshore Wind Farm should be agreed with Marine Directorate.

Transboundary impacts

Do you agree that transboundary effects can be scoped out of the EIA?

Potential transboundary effects for marine mammals and other megafauna are considered in Section 11.9. As cetaceans are highly mobile and long ranging transboundary effects should be covered, albeit qualitatively. We advise that transboundary effects or at least cross border are scoped in for further consideration in the EIA Report.

Impacts to the Southern Trench MPA will be considered in a separate MPA assessment, are you content with this approach?

We are content with the proposed approach to consider impacts to the Southern Trench ncMPA within a separate MPA assessment, as noted in Section 11.12 and Section 20.2. We also note that further consideration of minke whale, a protected feature of the Southern Trench MPA, is referred to within Section 11.10.

Mitigation and monitoring

We note the commitment to considering mitigation measures throughout the design process (Section 11.6). Some of this detail is likely to be included within post consent plans - we advise that the details of any proposed mitigation is included within draft plans included as part of the EIA Report.

We consider there to be an opportunity for collaboration around the planning and routing of the export cable corridor to the landfall. The landfall location is likely to be in close proximity to other cables and pipelines as well as passing through the Southern Trench ncMPA. In addition to collaboration on planning / routing, consideration should also be given to monitoring (baseline and beyond) on minke whale - Southern Trench ncMPA feature.

Whilst too early to advise on the need for any specific post consent monitoring, we encourage the applicant to consider collaborative monitoring opportunities at a strategic level with other developers and Marine Directorate.

Additionally as this is a fully floating WTG project, NatureScot encourage the developer to engage with the fishing and oil & gas industries as well as oceanographers, to consider researching secondary entanglement of marine megafauna on mooring lines.

Appendix C – Fish and Shellfish Ecology

Fish and shellfish interests are considered in Section 9 of the EIA Scoping Report. Embedded mitigation measures and impact pathways are further summarised within the Scoping Report Appendix A - Mitigation Register and Appendix B - Impacts Pathway Register.

Scoping questions to consultees have been set out in Section 9.11 of the Scoping Report, within our advice below we have used text boxes to clearly identify each of these questions.

Our advice below focuses on those fish and shellfish species, and where appropriate their associated habitats, that are protected features of European sites or ncMPAs as well as those that are of conservation importance including Priority Marine Features (PMFs)[18] and key prey species.

We advise that in relation to PMFs the assessment should quantify, where possible, the likely impacts to key fish and shellfish PMF species. It should assess whether these could lead to a significant impact on the national status of the PMF being considered[19].

Study area

We are content with the marine fish and shellfish study areas as defined in Section 9.4 of the Scoping Report. The study area consists of a regional study area and a local study area.

The regional study area extends across much of the northern North Sea (including Orkney). The local study area has been defined by applying a 25km buffer around the array area and export cable corridor search area. This buffer accounts for tidal excursion and the maximum distance for temporary increases in suspended sediments. Underwater noise has not been modelled at this stage, but it is expected that the 25km buffer will also account for underwater noise impacts. We note that the regional study area may be refined post-scoping as the assessment is developed.

We note that for diadromous fish species there is limited knowledge of distribution and behaviour of these species in the marine environment. For example, the precise migration routes of adult or juvenile Atlantic salmon or direction taken by migrating adult European eels is not fully known. Published information indicates that European smelt and River lamprey are primarily, though probably not exclusively, associated with estuarine environments. Shad might also prefer estuarine environments. The recently updated ScotMER evidence map[20] process for diadromous fish confirms the evidence gaps, particularly with respect to spatial and temporal distribution as well as uncertainty around migration routes and connectivity to protected sites. The ScotMER process is an important vehicle for helping to address these evidence gaps and uncertainties. We specifically welcome the ScotMER project 'Diadromous Fish in the Context of Offshore Wind – Review of Current Knowledge & Future Research'. This research may change conclusions on how diadromous fish are treated in both EIA and HRA going forward.

We have concluded that, based on evidence currently available to us, it is not possible for us to carry out an assessment of diadromous fish to the level required under HRA. We therefore advise that diadromous fish species should be assessed through EIA only and not through HRA.

[18] https://www.gov.scot/policies/marine-environment/priority-marine-features/
[19] https://www.nature.scot/doc/priority-marine-features-guidance
[20] https://www.gov.scot/publications/diadromous-fish-specialist-receptor-group/ – published 26 January 2023

Baseline characterisation

Are you happy with the data sources and proposed approach to the characterisation of the fish and shellfish ecology baseline within the EIA?

We support the proposed approach of carrying out a desk-based review of existing fish and shellfish ecology data. This will be supplemented by site-specific survey data obtained from geophysical and geotechnical surveys, particle size analysis and eDNA sampling.

Table 9.2, Section 9.5.1, captures most of the relevant baseline data sources. These data sources include datasets available from National Marine Plan Interactive (NMPi)[21], and we would like to highlight the herring modelling for Scotland layers available on NMPi. We also recommend consideration of sandeel distribution modelling from Langton et al. (2021)[22].

An overview of the baseline environment is provided in Section 9.5.2. We agree with the fish and shellfish species identified and welcome the consideration of fish species in relation to the wider ecosystem and their availability as prey species.

Potential impacts

Are you content that all receptors, potential impacts and pathways have been identified for fish and shellfish ecology? Are you in agreement with the impacts which have been scoped in and out of the EIA for further assessment, for fish and shellfish ecology?

We are content that all receptors, potential impacts and pathways are identified for all fish and shellfish ecology. Potential impacts to be scoped in and scoped out of further assessment are summarised in Table 9.6, Section 9.7. We provide the following comments regarding impact pathways identified for the operation and maintenance phase:

Underwater noise

For underwater noise impact pathways, included within Table 9.6, we advise the following:

- Export cables – operation and maintenance phase - scope out.
- Export cables – construction – scope in.
- Export cables – decommissioning – scope in.

EMF impacts

We welcome the scoping in of EMF effects for inter-array cables. However, we advise that for the operation and maintenance phase EMF effects of the export cable should also be scoped in. We recognise that this impact pathway is not well understood at present, however we consider that not knowing an effect should not exclude it from EIA assessment.

Secondary entanglement

We agree that secondary entanglement (from ghost fishing gear) should be scoped in for inter-array cables during the operation and maintenance phase.

[21] https://marinescotland.atkinsgeospatial.com/nmpi/

[22] https://www.researchgate.net/publication/350508503_A_verified_distribution_model_for_the_lesser_sandeel_Ammodytes_marinus

Approach to assessment

Do you agree with the proposed approach to the EIA, as set out in section 9.10?

Fish have been considered from a fish ecology point of view and their relationship to wider ecosystem and availability as prey species (rather than purely a commercial fisheries point of view). This approach is welcomed.

We are keen to ensure that within the EIA Report impacts to key prey species (such as sandeel, herring, mackerel and sprat) and their habitats are considered for this development alone and cumulatively with other wind farms. Increasingly we need to understand impacts at the ecosystem scale. Therefore, consideration across key trophic levels will enable better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance on marine mammal (and other top predator) interests and how this may influence population level impacts. Consideration of how this loss and or disturbance may affect the recruitment of key prey (fish) species through impacts to important spawning or nursery ground habitats should also be assessed. The PrePARED (Predators and Prey Around Renewable Energy Developments) project may be helpful in the understanding of predator-prey relationships in and around offshore wind farms.

Cumulative impacts

We are content with the approach to the cumulative impact approach, as outlined in Section 4.4 and 9.8.

Mitigation and monitoring

Do you agree on the suitability of proposed embedded mitigation for fish and shellfish ecology, for the Proposed Development?

Embedded mitigation measures for fish and shellfish ecology are described in Section 9.6 and Appendix A - Mitigation Commitment Register of the Scoping Report.

Measure EM4 proposes that infrastructure will be micro-sited, where practicable, around any sensitive seabed habitats including Annex 1 habitat and PMF species. We advise that this should be extended to also include sandeel and herring spawning habitat.

Noting our advice above on EM4, we are otherwise content with the embedded mitigation measures for fish and shellfish ecology. We advise that the full range of mitigation measures and published guidance is considered and discussed in the EIA Report.

With regard to monitoring, we advise that there may be a requirement for specific monitoring studies both within the array area and the export cable corridor. Further consideration should be given to monitoring post-consent, pre-construction and during the operation of the wind farm to increase understanding of both construction impacts and knowledge of fish ecology within floating wind farms.

We are aware of Offshore Wind Directorate (ScotMER) research proposal to carry out in-field measurements of EMF to better understand impacts on benthic and fish species. Therefore, any input this project could assist with, either from project measurements or contributions to this wider work, would be very beneficial.

Transboundary impacts

Are you happy that transboundary impacts for fish and shellfish ecology are scoped out of further assessment?

Potential transboundary effects are considered in Section 9.9. We agree that transboundary impacts are not expected for fish and shellfish receptors and can be scoped out from further consideration.

Appendix D – Benthic Ecology

Benthic ecology impacts are considered in Section 8 of the EIA Scoping Report. Embedded mitigation measures and impact pathways are further summarised within the Scoping Report Appendix A - Mitigation Register and Appendix B - Impacts Pathway Register.

Scoping questions to consultees have been set out in Section 8.11 of the Scoping Report, within our advice below we have used text boxes to clearly identify each of these questions.

Study area

We are content with the study area as described in Section 8.4 and shown in Figure 8.1. Two study areas are defined, the local study area and the regional study area.

The local study area includes the Array Area and Export Cable Corridor (ECC) search area plus a 25 km buffer. We note that the proposed local study area may be refined post-scoping based on outputs from modelling, surveys and consultation, as well as confirmation of the ECC and design parameters.

Baseline characterisation

Do you agree with the data sources, including project specific surveys, to be used to characterise the benthic and intertidal ecology baseline within the EIA?

We support the proposed approach of carrying out a desk-based review of existing benthic subtidal ecology data, focusing on sourcing data that has been collected within or near to the study area. We are content with the list of existing datasets as described in Table 8.2. We note that this will be supplemented by site-specific survey data obtained from geophysical and environmental surveys.

An overview of the baseline environment is provided in Section 8.5.2, within this section Table 8.3 summarises benthic features of conservation interest that are found within the local study area. Table 8.3 notes that Sabellaria reefs will be considered as Annex I biogenic reefs, which we welcome. Please note, however, Sabellaria reefs are also listed as being PMFs and MPA Search Features which is incorrect.

Potential impacts

Do you agree that all pathways, receptors and potential impacts have been identified for benthic and intertidal ecology?

We are content that all relevant pathways, receptors and potential impacts have been identified, as summarised in Table 8.5 and Appendix B - Impacts Pathway Register.

Do you agree with the project impacts which have been scoped out for the EIA for benthic and intertidal ecology?

We agree with the impacts scoped in as shown in Table 8.5 and Appendix B - Impacts Pathway Register.

Table 8.5 indicates that accidental pollution has been scoped out, we are content with this.

Approach to assessment

Do you agree with the proposed approach to assessment?

The proposed assessment approach is set out in Section 8.10.2 and we are content with this approach.

Cumulative impacts

We are content with the assessment methodology for benthic ecology interests, as described in Section 8.8.

Mitigation and monitoring

Do you agree on the suitability of proposed embedded mitigation of relevance to benthic and intertidal ecology that have been identified for the Proposed Development? Do you have any feedback on the mitigation options available for benthic ecology?

We note the embedded mitigation measures described in Section 9.6 and summarised in Appendix A - Mitigation Register.

EM9 - embedded mitigation measure refers to the development of a Cable Plan (CaP) which will be informed by a Cable Burial Risk Assessment (CBRA). In Section 3.6.2.4 it is stated that cable burial depths with be informed by a CBRA - the burial depth being considered for offshore export cables will be between 0 and 2 metres. To help mitigate potential effects of EMF, we advise that the minimum target burial depth should be 1 metre.

No specific monitoring for benthic ecology is detailed in the Scoping Report. Further information on proposed benthic monitoring should be discussed in the EIA Report.

Transboundary impacts

Do you agree that the transboundary impacts for benthic and intertidal ecology may be scoped out of the EIA?

We agree, as per Section 8.9, that transboundary impacts can be scoped out from further consideration for benthic ecology.

Northern Lighthouse Board

Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: 0131 473 3100
Fax: 0131 220 2093

Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: SCOP-0031
Our Ref: AL/OPS/ML/O6_31_845

Mr Iain MacDonald
Licensing Operations Team – Marine Directorate
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

5 October 2023

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017, REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 & REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007

Request for Scoping Opinion for Proposed Section 36 Application and Marine Licences for the Buchan Offshore Wind Farm Located Approximately 75km Northeast of the Fraserburgh

Thank you for your e-mail correspondence dated 4th October 2023 relating to the Scoping report submitted by **Buchan Offshore Windfarm Ltd** in relation to the proposed Buchan Offshore Wind Farm development located approximatly 75 kilometres northeast of Fraserburgh.

Northern Lighthouse Board note the inclusion of Chapter 13 – Shipping and Navigation within the report, with particular reference to Section 13.7, detailing the Embedded Mitigation Considered Within the EIA, and also to Section 13.9 Potential Cumulatve Impacts.

NLB also note within Table 13.9 - Impact pathway table for shipping and navigation that the installation of an Intermediate Reactive Compensation (IRC) Platform is to be included within the NRA. NLB have considerable concerns regarding the numbers of these platforms that may potentially be deployed by various offshore wind projects, and the additional hazard to navigation that these may cause.

Northern Lighthouse Board also note that Wet Storage areas will be included within the NRA, in addition to the potential for WTG units to be removed from the array for major maintenance operations. These subjects will require to be addressed within future documentation such as the Lighting and Marking Plan, so as to provide detail to the mitigations identified within the Scoping Report.

NLB have no objection to the content of the Scoping Report, and no suggestions for additional content.

Yours sincerely
[Redacted]

Peter Douglas
Navigation Manager

NorthLink Ferries

From:	Amber Johnson
To:	Iain Macdonald
Cc:	John Mckay; Kirsty Black; Stuart McCallum
Subject:	RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Date:	15 November 2023 09:41:36
Attachments:	image001.png

Good Morning Iain,

As previously advised, a meeting was held between NorthLink Ferries and NASH Maritime Consultants on the 8th September to discuss the Buchan Offshore Wind project (Scotwind NE8 Site).

I will summarise the key points specific to our operation, that were discussed during this meeting.

Location of Array Area

With exception of very occasional weather routing, our vessels generally pass 4NM to the West of the Array Area. With this in mind, we do not foresee any issues with location.

Location of IRC Platform

Search area for IRC Platform – illustrated on page 84 of scoping report.

We note that a buffer zone of 2NM has been applied against our identified standard routes, in line with MGN 654 which determines risk to be low between 2NM-3.5NM from shipping routes. This would be considered the minimum buffer required, it was made clear that our preference would be for a greater distance.

Best Regards,

Amber Johnson
Marine Superintendent

T: 01224 560326
[Redacted]
E: Amber.Johnson@northlinkferries.co.uk
W: www.northlinkferries.co.uk

Serco NorthLink Ferries
Jamieson Quay
Aberdeen, AB11 5NP

From: Iain.Macdonald3@gov.scot <Iain.Macdonald3@gov.scot>
Sent: Tuesday, November 14, 2023 3:30 PM
To: Amber Johnson <Amber.Johnson@northlinkferries.co.uk>
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Good afternoon Amber,

Thank you for your email and for responding to the above consultation.

Please note that MD-LOT do not have a copy of the minutes from the NASH Maritime meeting held on the 8th September. If you were able to provide these to MD-LOT, extracting the relevant parts of the minutes and documenting these within an email, MD-LOT will be able to consider these for the above consultation. Could I please request that any representation is provided to MD-LOT by COP 15 November 2023.

Kind Regards
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

The Scottish Government

From: Amber Johnson <Amber.Johnson@northlinkferries.co.uk>
Sent: Tuesday, November 14, 2023 10:06 AM
To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Cc: John Mckay <John.Mckay@gov.scot>; Kirsty Black <Kirsty.Black@gov.scot>
Subject: RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Good Morning Iain,

Apologies for the delay in getting back to you, I have been out of office for several weeks.

With regards to the Buchan project, we held a meeting with NASH Maritime on the 8th September where impacts on our operations were discussed. We received a copy of the meeting minutes from this which I presumed would be considered as our consultation on this project?

Best Regards,

Amber Johnson

Marine Superintendent

T: 01224 560326
[Redacted]
E: Amber.Johnson@northlinkferries.co.uk
W: www.northlinkferries.co.uk

Serco NorthLink Ferries
Jamieson Quay
Aberdeen, AB11 5NP

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: Monday, November 6, 2023 12:22 PM
To: MD.MarineRenewables@gov.scot
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

Please note that the consultation period for the above application concluded on the 03 November 2023. As MD-LOT did not receive a response from you by this deadline, we have assumed a nil response.

Kind regards
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted] E: Iain.Macdonald3@gov.scot

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From: MD Marine Renewables
Sent: Wednesday, October 4, 2023 2:00 PM
To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Cc: John Mckay <John.Mckay@gov.scot>; Kirsty Black <Kirsty.Black@gov.scot>
Subject: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind

NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
(collectively referred to as the "EIA Regulations").

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Buchan Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at:
https://marine.gov.scot/node/24504

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment ("EIA") Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project**. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

Please submit your response electronically to MS.MarineRenewables@gov.scot by **03 November 2023**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Many thanks,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted] E: Iain.Macdonald3@gov.scot

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North Sea Transition Authority

From:	Stuart Walters (North Sea Transition Authority)
To:	MD Marine Renewables
Cc:	John Mckay; Kirsty Black
Subject:	COP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Date:	03 November 2023 12:28:15
Attachments:	image001.png

Good Afternoon,

Please find below a response from the NSTA on the Buchan Offshore Windfarm scoping report:

- The NSTA licence, regulate and influence the UK oil and gas, offshore hydrogen and carbon storage industries and are grateful for the opportunity to comment on the scoping report.
- The proposed export cable corridor may pass through both extant petroleum and carbon storage licences as well crossing pipelines. The developer will need to ensure relevant licensees and pipeline owners are consulted well in advance to allow time for any variations or updates to existing consents and approvals to allow for these crossings. For instance for active pipelines a pipeline works authorisation variation may be required and for decommissioned pipelines an update to any decommission plans may be sought. The pipeline owners and licensees will be responsible for approaching the relevant regulators (NSTA and OPRED) to address any updates.
- To check status of pipelines and umbilicals listed as there may be some which don't align with NSTA understanding, for instance PL1587 owned by Respol Sinopec is listed as not in use however our information lists it as active. There may be some others which need checking.
- Double check status of Licensed Blocks in table 18.7 as there appear to be a few discrepancies e.g P2517 (Block 14/26b) is currently licences to Tangram Energy with the licence still active. The same issues appear to be present for P2514 (Block 13/17b), P2514 (Block 13/18), P2528 (Block 20/11a) and P2528 (Block 20/6c) all of which currently have active licence owners.
- For the Carbon Storage Licence in Table 18.10 the owner is listed as Pale Blue Dot Energy (this is also still stated on our website) but for awareness Pale Blue Dot Energy was purchased by Storegga. It appears from the engagement table in the Scoping Report the developers are aware of this and already speaking to the right contacts within Storegga.

- On the 33rd Round to inform the developer that:
  - Tranche 1 of the offered awards were announced on 30 October 2023 with the maps and shapefiles of areas awarded available here Licensing (nstauthority.co.uk).
  - The NSTA is currently still reviewing Tranche 2 of the applications with further assessment and awards to follow in early 2024.

Best Regards,

Stuart Walters
Senior Policy Manager – Energy Transition
Strategy Directorate
NSTA, Lower Ground Floor, Sanctuary Buildings, 20 Great Smith

North Sea Transition Authority

Street, London, SW1P 3BT

stuart.walters@nstauthority.co.uk
[Redacted]

www.nstauthority.co.uk Follow us on Twitter @NSTAuthority

Royal National Lifeboat Institution

From:	Jill Hepburn (Head of Region)
To:	MD Marine Renewables
Cc:	John Mckay; Kirsty Black
Subject:	RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Date:	31 October 2023 11:44:02
Attachments:	image002.png image003.png image005.png

Good morning

Upon review of the Scoping document and EIA I am submitting a Nil return.

Regards

Jill

Jill Hepburn | She/Her | Head of Region – Scotland
[Redacted] | E:jill_hepburn@rnli.org.uk |

Lifeboats Lifeguards

The RNLI is the charity that saves lives at sea

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

Sent: Thursday, October 26, 2023 9:55 AM

To: MD.MarineRenewables@gov.scot

Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot

Subject: RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

> You don't often get email from md.marinerenewables@gov.scot. Learn why this is important

Good morning,

Kind reminder that if you wish to submit any representations in response to the above consultation, I would be grateful if they could be forwarded to me in an electronic format (MD.MarineRenewables@gov.scot) by **03 November 2023**.

Kind Regards

Iain

Iain MacDonald

Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted]

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From: MD Marine Renewables

Sent: Wednesday, October 4, 2023 2:00 PM

To: MD Marine Renewables <MD.MarineRenewables@gov.scot>

Cc: John Mckay <John.Mckay@gov.scot>; Kirsty Black <Kirsty.Black@gov.scot>

Subject: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
(collectively referred to as the "EIA Regulations").
SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Buchan Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at:
https://marine.gov.scot/node/24504

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment ("EIA") Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project**. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

Please submit your response electronically to MS.MarineRenewables@gov.scot by **03 November 2023**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Many thanks,

Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

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This e-mail (and any files or other attachments transmitted with it) is intended

Royal Society for the
Protection of Birds (Scotland)

Marine Directorate Licensing Operations Team
Marine Scotland
By email: MS.MarineRenewables@gov.scot

8th November 2023

Dear Iain,

SCOP-0031 -REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 AND MARINE LICENCE APPLICATION FOR THE BUCHAN OFFSHORE WIND FARM

Thank you for consulting RSPB Scotland on the above proposed development located approximately 75 km off the Aberdeenshire coast in in the Sectoral Marine Plan (SMP) Option NE8.

We understand the proposed Buchan Offshore Wind Farm would have generating capacity of up to 1GW and an array area of up to 330km^2. It would consist of up to 70 floating offshore wind turbines (with maximum tip height 355 meters above LAT, maximum rotor diameter of 310 meters and minimum blade tip clearance to LAT of 30 meters) up to 3 offshore electrical platforms, an intermediate Reactive Compensation (IRC) platform within the export cable corridor as well as inter-array and export cables and accompanying protection. There will also be associated onshore transmission infrastructure to facilitate connection to the national grid, though we note these elements are not included in the current consultation. Subject to gaining consent, we note construction may commence around 2028 and would take around 3-5 years.

We have been unable to ascertain the proposed lifetime of the development but note the Population Viability Analysis (PVA) modelling will be undertaken for 25, 50 and 60 years.

Our comments focus on the ornithological elements of the proposed development.

General Comments

The UK is of outstanding international importance for its breeding seabirds and wintering marine birds. As with all Annex I and regularly migratory species, the UK has a particular responsibility under the Birds Directive to secure their conservation. Their survival and productivity rates can be impacted by offshore windfarms directly (i.e. collision) and indirectly (e.g. displacement from foraging areas, additional energy expenditure, potential impacts on forage fish and wider ecosystem impacts such as changes in stratification).

RSPB Scotland encourage the adoption of a precautionary approach to the identification of relevant protected sites for seabirds with clear methodology on the exclusion of sites and species. We generally agree with the collection and analysis methods advised by NatureScot, with some exceptions as set out below. If an

Applicant chooses to undertake supplementary modelling using alternative parameters to that recommended, we suggest this is clearly labelled.

As set out in Searle et al (2023)[1], assessing impacts of offshore windfarms and other renewables developments is inherently uncertain. This uncertainty is propagated throughout the impact assessments, as there are not only direct impacts, but ecosystem wide impacts that can change, for example, the abundance and availability of prey. Multiple data sources and modelling techniques are used to capture a simplified version of reality. They do not fully capture the complexity of seabird behavioural or demographic processes in a dynamic marine environment.

Not recognising these uncertainties risks poorly informed decisions being made. Furthermore an underestimation of impacts will have repercussions when consenting later offshore wind development. If a precautionary approach is taken from the beginning, the likelihood of irreversible damage occurring is reduced even whilst our knowledge base is incomplete, and modelling improves.

Scoping Questions

RSPB Scotland agree with the study area as shown on Figure 10.1 which consists of the area used for the DAS surveys (proposed array area and 4km buffer) plus the offshore cable corridor. For the avoidance of doubt, connectivity beyond this area must be considered.

Do you agree with the use of those data listed in section 10.5, and any additional anticipated data listed in section 10.10, being used to inform the Offshore EIA? Are there any additional data sources or guidance documents that should be considered?

In regard to use of the data listed in Section 10.5 and additional anticipated data listed in Section 10.10 we have a number of comments.

- **Bio-seasons** - RSPB scotland has outstanding issues with the manner in which the bio-seasons definitions from Furness (2015)[2] have been defined for gannet and kittiwake. This is because by using the "migration-free" seasonal definition as opposed to full breeding season the early and later months of the season are effectively excluded. For example, the kittiwake breeding season is defined as May to July, when evidence from colony monitoring shows that birds are present from April at least to August. In the latter part of the season all birds will have fledged but individual birds will still be present with both young and adult birds coming back to the cliff. These are still SPA birds, and those most likely to be affected by impacts from the development.

[1] Searle, K. R., O'Brien, S. H., Jones, E. L., Cook, A. S. C. P., Trinder, M. N., McGregor, R. M., Donovan, C., McCluskie, A., Daunt, F., and Butler, A., 2023. *A framework for improving treatment of uncertainty in offshore wind assessments for protected marine birds*, ICES Journal of Marine Science, 2023;, fsad025, https://doi.org/10.1093/icesjms/fsad025

[2] Furness, R.W. (2015) Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS). Natural England Commissioned Reports, Number 16

RSPB Scotland Headquarters
2 Lochside View
Edinburgh Park
Edinburgh
EH12 9DH

Tel: 0131 317 4100
Facebook: @RSPBScotland
Twitter: @RSPBScotland
rspb.org.uk

- **Foraging Ranges –** We welcome using foraging ranges as published in Woodward *et al*. (2019)[3] and recommended by NatureScot in Guidance Note 3. to derive connectivity with SPA colonies. We also recommend that site specific data are examined and where the maximum foraging range from the colony exceeds the generic value, that the site-specific value is used. The exceptions to this are for common guillemot and razorbill. Tracking on Fair Isle showed foraging for both common guillemot and razorbill distances are greater than those of all other colonies. This may relate to poor prey availability during the study. However, trends for seabirds in the Northern Isles indicate this may be becoming a more frequent occurrence. For all designated sites south of the Pentland Firth (i.e. excluding the Northern Isles), we advise use of mean max (MM) plus one standard deviation (SD) discounting Fair Isle values. For clarity, North Caithness Cliffs SPA is considered to lie south of the Pentland Firth.

	All Northern Isle SPAs	**All sites south of Pentland Firth**
Common guillemot	153.7 MM+SD	95.2 MM+SD
Razorbill	164.6 MM+SD	122.2 MM+SD

- **Unidentified Species -** The hierarchical method for dealing with unidentified species is likely to be unavoidable given the constraints of Digital Aerial Survey. The extent of the potential bias that will be created by the method will not be clear until the full results are available. RSPB Scotland welcome the review of the data suggested and its presentation to NatureScot and would be happy to be involved in those discussions.
- **Displacement -** We agree with the use of the Seaboard model for kittiwake, guillemot, razorbill and puffin (as agreed with NS)

  For gannet displacement analysis an availability bias should also be applied to input densities, following the same logic as for other diving species. (This is not necessary for densities used in collision risk models as only birds in flight are considered).
- **Gannet avoidance rates** - Whilst the RSPB agree with the majority of the NatureScot advised Avoidance Rates including the use of a 99.2% avoidance rate for non-breeding gannets, in our opinion, a 98% avoidance rate is more appropriate for breeding gannets. This is because the figures used for the calculation of avoidance rates advocated by the SNCBs are largely derived from the non-breeding season for gannet. During the breeding season, gannets are constrained to act as central placed foragers meaning they return to the colony after feeding in order to maintain territories, incubate eggs and provide for chicks. Once chicks have fledged adult gannets remain at sea and no longer visit the colony. Differences in behaviour between the breeding and non-breeding season are likely to result in changes in avoidance behaviour. This seasonally defined change in reactive

[3] Woodward, I., Thaxter, C.B., Owen, E. and Cook, A.S.C.P. (2019). Desk-based revision of seabird foraging ranges used for HRA screening. BTO Research Report No. 724, British Trust for Ornithology, Thetford. ISBN 978-1-912642-12-0.

RSPB Scotland Headquarters
2 Lochside View
Edinburgh Park
Edinburgh
EH12 9DH

Tel: 0131 317 4100
Facebook: @RSPBScotland
Twitter: @RSPBScotland
rspb.org.uk

behaviour will also be reflected in the distributional changes occurring due to the presence of turbines. As such, alongside the 70% displacement rate recommended by NatureScot for the assessment of gannet, we recommend the presentation of 60% displacement rate during the breeding season.

- In regard to macro avoidance for gannet, there is currently no agreed mechanism to combine collision and distributional change modelling, although a framework had been created[4]. We agree with NatureScot that the NE approach of applying a macro-avoidance rate to gannet density prior to calculating collision risk is inappropriate for breeding birds.
- **PVA -** RSPB Scotland welcome the proposed use of NE PVA tool, and the presentation of counterfactual outputs
- **Seabird Census –** The fourth census of Britain and Ireland's internationally important populations of breeding seabirds is due for publication in November 2023. We recommend this is used as the most up-to-date record of seabird numbers. Further information is available at: Seabirds Count | JNCC - Adviser to Government on Nature Conservation

Do you agree that all receptors related to offshore and intertidal ornithology have been identified, and that the preliminary list of key species (section 10.5.2) is appropriate?

In regard to the preliminary list of key species (section 10.5.2), we encourage a broad-long list at this stage. We note some species, such as Manx shearwater and European storm petrel, are recorded in small numbers (<10 observations) are small and tend to fly outside daylight hours (i.e. outside the DAS flight window). This means it is unlikely they will be recorded in the DAS. It is not appropriate to screen out these receptors on this basis. Other available contextual data, such as tracking or boat surveys should be sought out and used to give an account for potential bias.

Do you agree with the scoping in and out of impact pathways in relation to offshore and intertidal ornithology?

We broadly agree with the scoping in and out of the primary impact pathways but consider more thought should be given to secondary and cumulative impact pathways. For example, the section on stratification (currently considered in isolation in the Physical and Coastal Process, Chapter 6), should be considered in the context of offshore wind development and the effects of this on prey availability and seabird foraging areas scoped in.

Do you agree with the proposed assessment methodology for offshore and intertidal ornithology, including those for transboundary effects and cumulative effects?

As above, we generally support the use of NatureScot guidance. We are concerned that a number of developments have been omitted from the list of potential cumulative projects, including those in the Firth of

[4] Kate Searle, Adam Butler, Deena Mobbs, Mark Trinder, Ross McGregor, Aonghais Cook, Aly McCluskie, Bruno Caneco, and Francis Daunt, (2020) Study to Examine how Seabird Collision Risk, Displacement and Barrier Effects Could be Integrated for Assessment of Offshore Wind Developments. Report to Marine Scotland Science

RSPB Scotland Headquarters
2 Lochside View
Edinburgh Park
Edinburgh
EH12 9DH

Tel: 0131 317 4100
Facebook: @RSPBScotland
Twitter: @RSPBScotland
rspb.org.uk

Forth Area (such as Inch Cape, Neart na Gaoithe, and Seagreen) as well as the Pentland Floating Offshore windfarm (permitted for 10 years and currently subject to a Section 36 Variation).

Do you agree with the list of species proposed for assessments using collision risk modelling and displacement analysis.

In regard to the species highlighted for collision risk modelling and displacement analysis, we recommend this is reviewed once all the DAS has been collected. We also re-iterate species that are unlikely to present in DAS due to size/behaviour despite there being colonies in foraging range should not be scoped out. Impacts to these species must be considered.

We defer to NatureScot in regard to use of site-specific avoidance rates but wish to highlight that there must be careful post consent monitoring done to derive site specific avoidance rates.

Do you agree that the embedded mitigation outlined is suitably relevant to offshore and intertidal ornithology?

We are pleased to see a commitment to a minimum airgap of 30 metres. It should be made clear that embedded mitigation will put nature first (e.g. Vessel Management Plan to avoid disturbance, lighting and marking plan to utilise ornithologically friendly design etc). Where mitigation involves reliance on advice from an Ecological Clerk of Works at the time, the Ecological Clerk of Works must be empowered to hold off works if necessary.

Given the requirement for collision risk modelling to be run using Option 3, could confirmation be provided on the input parameters to be used (not specified for Option 3 models in NatureScot (2023f) guidance), and how site-specific avoidance rates should be calculated (as advised in the NatureScot (2023f) guidance for Option 3 models

We agree with NatureScot (2023) guidance for running CRM. Running CRM with Option 3 provides valuable context, but our decision around significance of impacts will be based on option 2. Similarly running the models deterministically adds context particularly when looking comparatively at older developments.

EIA Assessment of Significance

We welcome use of the CIEEM (2019) guidelines and the avoidance of allocating degrees of significance. It would however be helpful to have clarification in the Environmental Statement that consideration of effect on population integrity is not limited to SPAs and is also considering regional populations.

When assessing sensitivity and magnitude, it is particularly relevant that:

- Seabirds are relatively long-lived, take longer to reach breeding age than most other birds and have just one or two young per year. As a result, their populations are sensitive to small increases in adult mortality.
- Once a temporary impact (e.g. collision risk from the operation of a windfarm) has ceased it will take time for the population to recover.

RSPB Scotland Headquarters
2 Lochside View
Edinburgh Park
Edinburgh
EH12 9DH

Tel: 0131 317 4100
Facebook: @RSPBScotland
Twitter: @RSPBScotland
rspb.org.uk

- NatureScot's latest assessment of 11 Scottish breeding seabird species show that numbers fell by nearly half (49%) between 1986 and 2019[5].
- Governments of the UK have collectively failed to meet 11 out of the 15 indicators of Good Environmental Status (GES) for our seas as required under the Marine Strategy Regulations 2010. The marine birds indicator is moving away from target. For breeding seabirds, more species are now experiencing frequent, widespread breeding failures[6] .
- Black-legged Kittiwake and Atlantic Puffin are red listed on the Birds of Conservation Concern and have been assessed by the IUCN as vulnerable to global extinction.
- The growth of offshore wind is placing great cumulative pressure on seabird colonies.

RSPB Scotland disagree with the magnitude of impact being assessed in terms of predicted increases to baseline mortality. As above, small increases in mortality can have large impacts. It is more meaningful to view impacts across the lifeline of the development in comparison to population size in the absence of the development and consider long-term viability of colonies and time for recovery.

EIA Non-technical Summary

RSPB Scotland advocate for the planning and consenting process to be accessible. In relation to ornithology, the EIA will contain complex statistical models, the output of which is not readily understood by a lay person. A non-technical summary (NTS) is therefore vital to set out the main findings of the EIA report in an accessible way and in plain English so that it is easily understood by the public. It should not just describe the process but also clearly present information (to the specifications of the scoping opinion) with interpretation and explanation with clear figures, maps, and tables as necessary. What is meant by 'significant' in an ornithological context should be included.

We recommend the NTS contains clear information on how the mitigation hierarchy has been followed. The mitigation hierarchy requires that:

- Adverse impacts should firstly be avoided as far as possible;
- Any remaining adverse impacts should then be minimised or reduced to as low as practical; and
- For residual adverse impacts which are both unavailable and cannot be reduced further, measures to remedy or offset the impacts should be included within the application.

To make the NTS informative, we welcome the use of short summary tables. We suggest a series of tables are used to present the following information:

- Annual mortality for relevant species using the methods set out in the scoping opinion for the development in isolation

[5] Scottish Biodiversity Indicator – The Numbers and Breeding Success of Seabirds (1986 to 2019) | NatureScot
[6] CEFAS Marine Assessment Tool – Marine Breeding Bird Success https://moat.cefas.co.uk/biodiversity-food-webs-and-marine-protected-areas/birds/breeding-successfailure/

- Annual mortality for relevant species using the methods set out in the scoping opinion for the development in cumulation with impacts arising from any existing or approved development
- Predicted population size of relevant SPA colonies after the lifetime of the proposed development using the methods set out in the scoping opinion presented and as a percentage (min-max) of what it would have been in the absence of the proposed development
- Predicted population size of relevant SPA colonies after the lifetime of the proposed development and other relevant developments (i.e in cumulation) using the methods set out in the scoping opinion and presented as a percentage (min-max) of what it would have been in the absence of the proposed development

Should you require any further information or clarification, please do not hesitate to get in contact.

Yours sincerely,

Catherine Kelham

Senior Marine Conservation Planner
RSPB Scotland

RSPB Scotland Headquarters
2 Lochside View
Edinburgh Park
Edinburgh
EH12 9DH

Tel: 0131 317 4100
Facebook: @RSPBScotland
Twitter: @RSPBScotland
rspb.org.uk

Royal Yachting Association Scotland

RYA SCOTLAND

Caledonia House
1 Redheughs Rigg
South Gyle
Edinburgh, EH12 9DQ

Tel: 0131 317 7388
www.ryascotland.org.uk

11th October 2023

Iain McDonald
Marine Licensing and Consenting Casework Officer
Marine Scotland – Marine Planning and Policy
Scottish Government
375 Victoria Road,
Aberdeen,
AB11 9DB
MS.MarineRenewables@gov.scot

Dear Iain,

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

I have read the relevant parts of the scoping report on behalf of RYA Scotland and have discussed it with my colleague in the Cruising Association. Clearly Shipping and Navigation should be scoped into the EIA. RYA Scotland and the Cruising Association would both like to contribute to the Navigational Risk Assessment. I have answered the questions posed on pages 383 and 384 of the scoping report below.

Do you agree that the relevant guidance and data sources (including surveys) upon which the assessment should be based have been identified?
As pointed out in the report, rather few recreational craft are likely to pass through the windfarm area but some certainly will and this may be in adverse weather. I expect that somewhere between a quarter and half of such vessels are likely to transmit an AIS signal. RYA Scotland hopes to have better data by the end of the year. The Cruising Association should be able to provide guidance as to the routes taken by yachts from the Baltic to Scotland and the time of year when such passages are most commonly made. There is much heavier recreational traffic round the coast as shown by the AIS heatmaps of the RYA's UK Atlas of Recreational Boating.

RYA SCOTLAND

Caledonia House
1 Redheughs Rigg
South Gyle
Edinburgh, EH12 9DQ

Tel: 0131 317 7388
www.ryascotland.org.uk

Do you agree with the proposed shipping and navigation study area and that it is sufficient to capture the relevant impacts?
Yes.

Do you agree that all of the impacts which will be assessed within the NRA have been identified?
An additional risk is the failure of Aids to Navigation marking the devices. There have been several cases where lights or AIS transmissions have failed on wind farms off the east coast of Scotland and it has taken several days to replace them due to adverse weather. Mitigation might include the use of virtual AtNs.

Do you agree with the proposed methodological approach to the NRA and EIA (including impact assessment)?
Yes.

Do you agree that the outlined embedded mitigation measures are appropriate and likely to sufficiently mitigate potential risks and/or impacts?
Yes. We note EM19 in relation to safety zones but would oppose any wider operational safety zones than are currently the norm for other wind farms.

Do you agree that appropriate consultees been identified?
The appropriate consultees for recreational boating have been identified.

Do you agree with the proposed approach to considering cumulative impacts?
Yes.

Yours sincerely,

[Redacted]

Dr G. Russell FCIEEM(retd) FRMetS

Salamander Offshore Wind Farm

SALAMANDER
Powered by Ørsted and Simply Blue Group

Simply Blue Energy (Scotland) Ltd.
E: salamanderwind@simplyblueenergy.com
W: https://salamanderfloatingwind.com/

7th November 2023

Response to the Buchan Offshore Wind, Offshore Scoping Report

To whom it may concern,

Salamander Offshore Wind Farm wishes to respond to the Buchan Offshore Wind, Offshore Scoping Report.

Salamander Offshore Wind Farm is being developed by Simply Blue Energy (Scotland) Limited (SBES), a joint venture partnership between Ørsted, Simply Blue Group and Subsea7.

Ørsted develops, constructs, and operates offshore and onshore wind farms, solar farms, energy storage facilities, and bioenergy plants, and provides energy products to its customers. Globally, Ørsted is the market leader in offshore wind and owns and operates the world's biggest offshore wind farms off the East Coast of the UK and thus we value the opportunity to participate in this consultation process.

Simply Blue Group is a leading blue economy developer focused on enabling a range of marine renewable energies. It develops pioneering blue economy projects – floating offshore wind, e-Fuels, wave energy, and low-impact aquaculture – all in harmony with the oceans.

Subsea7 is a global leader in the delivery of offshore projects and services for the evolving energy industry. Subsea7 creates sustainable value by being the industry's partner and employer of choice in delivering the efficient offshore solutions the world needs.

We would like to take this opportunity to clarify the stage of the Salamander Offshore Wind Farm:

- Salamander Offshore Wind Farm is being developed under the innovation track of the INTOG leasing round and submitted its EIA Scoping and HRA Screening Reports in February 2023;
- The Offshore Array Area for Salamander Offshore Wind Farm is approximately 35 km off the coast of Peterhead;
- The Offshore Export Cable is proposed to make landfall north of Peterhead, near Lunderton and Kirkton; and
- The Onshore Export Cable Corridor and other onshore infrastructure will be located north of Peterhead, close to the Export Cable landfall.

We note the Buchan Offshore Wind offshore project description, including the design envelope, is still in development but will be fully detailed in the Environmental Impact Assessment (EIA) Report, and will include indicative maximum project parameters, taking into account consultee feedback provided within the Scoping Opinion.

Simply Blue Energy (Scotland) Ltd.
E: salamanderwind@simplyblueenergy.com
W: https://salamanderfloatingwind.com/

The southern section of the Buchan Offshore Wind Export Cable Corridor (ECC) Search Area partially overlaps with the Offshore Scoping Boundary of the Salamander Offshore Wind Farm ECC, as does the southern section of the landfall Scoping Boundary. We note, however, that the Buchan Offshore Wind Preferred ECC does not overlap with either the offshore or landfall elements of the Salamander ECC. We understand from this that Buchan's preferred ECC route would not require crossing(s) of our export cables (either Buchan crossing Salamander or vice versa depending on construction timelines) but that there may be potential for this to occur, given the overlap of Buchan's ECC Area of Search and Salamander's Scoping ECC. Regardless of whether cable crossing(s) are required, the proximity of both ECCs, particularly at the sections near landfalls, could lead to cumulative effects. Therefore, there is the potential for our respective projects to interact and for both developments to have cumulative environmental effects on other receptors. We would therefore expect any EIA in respect of your proposals to fully consider the potential effects on, and potential cumulative effects with, our Salamander Offshore Wind Farm.

We also note that the Scoping Report this consultation response refers to, deals only with the offshore infrastructure elements of the Buchan Offshore Wind development and potential effects in respect of this, and that onshore elements will be dealt with separately. The Salamander project team will respond to any Scoping consultation relating to the onshore elements of the Buchan Offshore Wind development when appropriate but similar concerns around potential effects on, and cumulative effects with, Salamander project infrastructure would likely be included.

Salamander Offshore Wind Farm is working with Buchan Offshore Wind through the Peterhead Developers Forum, including regarding offshore survey planning to minimise disruption to other sea users and wishes to engage in any discussions and be kept informed of your proposals so that the two projects may consider each other cumulatively through the development process.

We are very pleased to have had the opportunity to input into your Scoping exercise at this stage and look forward to ongoing engagement in the future.

Yours sincerely,

Jennifer Brack
Consents Manager, Salamander Offshore Wind Farm

CC'd:
Marine Scotland – Licensing Operations Team [Email only]
Buchan Offshore Wind [Email only]

Scottish Water

Friday, 06 October 2023

Marine Licensing
375 Victoria Road

Aberdeen

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

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

Follow Us

Dear Customer,

Buchan Offshore Windfarm, North Sea, Highland, KW3 6BD
Planning Ref: SCOP-0031
Our Ref: DSCAS-0095756-5FW
Proposal: Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced. 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 contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes:

- 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

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."

Scottish Environmental
Protection Agency

From:	Planning.North
To:	MD Marine Renewables
Cc:	Iain Macdonald
Subject:	10715- SEPA response to SCOP-0031
Date:	17 October 2023 10:57:40
Attachments:	image001.png

OFFICIAL

Dear Iain MacDonald

Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
SCOP-0031
Buchan Offshore Windfarm
Buchan Offshore Wind – Scotwind NE8 Site

In line with the advice in the Transitional Arrangements for National Planning Framework 4 letter, issued by the Chief Planner, Fiona Simpson, on 8 February 2023 our position and advice given below is based on NPF4 policy.

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

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

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

Kind regards,
Barbara Olszowy
Planning Officer

OFFICIAL

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: Wednesday, October 4, 2023 2:00 PM
To: MD.MarineRenewables@gov.scot
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
(collectively referred to as the "EIA Regulations").

SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Buchan Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at:
https://marine.gov.scot/node/24504

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment ("EIA") Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project**. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

Please submit your response electronically to MS.MarineRenewables@gov.scot by **03 November 2023**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and

marine licence applications.

Many thanks,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

The Scottish Government

To see how we use your personal data, please view our
Marine licensing and consenting: privacy notice - gov.scot (www.gov.scot)

Scottish Fishermen’s Federation

SCOTTISH FISHERMEN'S FEDERATION

Our Ref: FH-BOWF/23-0001

Your Ref: SCOP-0031

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

T: +44 (0) 1224 646944
E: sff@sff.co.uk

www.sff.co.uk

E-mails to: MD.MarineRenewables@gov.scot
Iain.Macdonald3@gov.scot

03 October 2023

SFF Response on Buchan Offshore Windfarm Project (Scotwind NE8 Site) Scoping Consultation

This response to the scoping request is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association. The chair of NECrIFG has also been consulted and agrees.

SFF note from section 3.3 of the Report that the necessary information on site conditions and the procurement process is not available to inform the final project design consequently the PDE approach (also known as the 'Rochdale Envelope') will be adopted for the Environmental Impact Assessment (EIA) Report. Therefore, the following comments are based on existing details provided in this Scoping Report and further comments will be shared in due course once the Project's designed is finalised.

SFF notes from section 3.6.1.2.3 of the Report, 'Alternative WTG Foundation options' that a preferred WTG floating foundation option has been identified, in order to retain flexibility, further design options including TLP are included in the Design Envelope.

Being concerned of the spatial footprint of floating wind the potential snagging hazard created by moorings system, SFF preferred WTG floating foundation option is TLP and the second preferred option is Spar since they have lesser spatial footprint on seabed.

SFF note from the page 88, section 3.7.4, of the Report that the Developer will submit a decommissioning programme for approval by Scottish Ministers. Specific details on the decommissioning activities are not known at this stage of consent but will generally be considered to be a reverse of the installation process. To reiterate safety concern of the fishing vessels, SFF

would like to see all development related infrastructures are recovered/removed to shore followed by overtrawl sweeps. The seabed is restored to its pre-development condition post-decommissioning, and it is safe for fishing operations to fully resume in the area.

Inter-Array Cables (IACs)

SFF note from section 3.6.1.3, page 79 of the Report that the IACs will be fixed to the seabed at the point where contact is made. Lengths of cable in contact with the seabed may be surface laid or buried up to a depth of 2 m. Where cables cannot be buried, they may be protected using a range of cable protection methods including the use of rock, rock/ grout bags, concrete mattresses and protective cable shells.

Being concerned of fishermen's safety, SFF would like to see that maximum efforts are made by the Developer to ensure 100% cables burial (IACs, inter-connector and export cables) is achieved. In the event that cable burial is not achievable due to technical difficulties, we would recommend using industry standard size (1"-5") rock dump than concrete mattress and followed by an overtrawl sweep alongside a long-term monitoring programme. The fishing industry are opposed in the use of concrete mattresses in open water.

SFF also note from section '3.6.2.4 Offshore Export Cables', page 81 of the Report that the cable and pipeline crossing will occur while laying the IAC or inter-connector cables. As crossing points create obstacles and snagging hazard to the fishing industry, we would suggest that the cable crossing should be avoided as much as possible otherwise the design of cables and pipelines crossing points should be consulted with fishing industry to ensure their impacts are mitigated.

SFF notes from pages 80-81 of the Report that there are Offshore Substation Platforms (OSP) and one Intermediate Reactive Compensation (IRC) platform located within the ECC Search Area. Since the proposed OSP and IRC has large footprint, we request to be consulted on both types of the platforms site selections to ensure they do not set on any prime fishing ground.

SFF notes from section 3.6.4 of the Report that 'Wet Storage' would be required during the construction of the platforms. SFF would like to see a 'designated wet storage' area out with the routes of fishing vessels and that harbours are considered to avoid any disruptions to fishing vessels operations/activities.

Ch. 8 Benthic Subtidal Ecology

8.11 Scoping Questions

Following are the SFF's response on the relevant questions:

Q• Do you agree that all pathways, receptors and potential impacts have been identified for benthic and intertidal ecology?

SFF's answer:

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

Ch. 9. Fish and Shellfish Ecology

9.11 Scoping Questions

Q• Are you content that all receptors, potential impacts and pathways have been identified for fish and shellfish ecology?

SFF's response:
SFF would like to see the **"**Underwater sound from wind turbine operation" to be scoped in to determine the limit/depth of wind turbine sound impacts on the fish near the wind turbine and to ensure the behavioural changes amongst the fish are not severe/detrimental.

In addition, we suggest that the "Impact of the proposed development to seasonal stratification of the water column" be scoped in since there is lack of scientific evidence on this particular area.

Q• Are you in agreement with the impacts which have been scoped in and out of the EIA for further assessment, for fish and shellfish ecology?
SFF's response:
answer above.

Ch. 12. Commercial Fisheries
SFF appreciate the Applicants following commitment at Table 12.1 – 'Summary of consultation to date for commercial fisheries', page 322 and based on the previous engagement made with the fishing industry are looking forward to their implementation:

The Applicant is committed to ongoing engagement with the SFF during pre-application and beyond including:
• For the refinement of the Proposed Development boundary including the Export Cable Corridor (ECC);
• To coordinate and mitigate potential disruption to fishers from offshore surveys; and
• To collate further baseline data through engagement with fishing industry to support the EIA.

In addition, the Applicant committed to ongoing engagement with SWFPA and SFF during pre-application and future phases of the Proposed Development:
"Information provided regarding fishing activity has been considered as part of the identification and refinement of the ECC and as part of engagement with the fishing industry including via the FLO for the 2023 Site Investigation (SI) Campaign. The preference for removal of anchors at the point of decommissioning is noted."

12.11 Scoping Questions
Q• Do you agree with the data sources to be used to characterise the commercial fisheries baseline within the EIA?

SFF's answer:
Yes, however, further engagement with fishing industry on the authentication of the data accuracy would be beneficial.

Q• Do you agree that all pathways, receptors, and potential impacts have been identified for commercial fisheries?

SFF's response:
We assume many bases have been covered; however, we have observation about the short term statement impacts on the fishing industry since any parts of the OREI has long term impacts on fishing operation at the relevant sites, as fishing will most probable cease as soon as the project commences through to decommissioning.

Q• Do you agree that the embedded mitigation measures described provide a suitable means for managing and mitigating the potential effects of the Proposed Development on commercial fisheries receptors?

SFF's answer:
We would propose the following mitigation measures should also be considered too:

1. Adhere to Colregs at all times-
2. Utilise the services of an O.F.L.O due to the location in relevance to fishermen.

Ch. 13. Shipping and Navigation
13.12 Scoping Questions
Q• Do you agree with the proposed shipping and navigation study area and that it is sufficient to capture the relevant impacts?

SFF's response:
We agree with the proposed study area, but we reserve an observation on the accuracy of data at the Figure 13.7, Fishing vessels activities, Page 365. Our records show more fishing activities in the area comparison to the data stipulated at the mentioned figure since it is a more utilised fishing ground than the figure shows.

Q• Do you agree that all of the impacts which will be assessed within the NRA have been identified?

SFF's response:
Yes.

Q• Do you agree that the outlined embedded mitigation measures are appropriate and likely to sufficiently mitigate potential risks and/or impacts?

SFF's answer:
Yes.

Designed In Measures and Mitigation
SFF appreciate the Applicants efforts on the following commitments and share observations accordingly:
EM25 - Development of and adherence to a Fisheries Management and Mitigation Strategy (FMMS) by the developer. However, we would propose the FMMS to be developed and adopted pre-consent/development in consultation with fishing industry to ensure all fishing industry's concerns are considered and addressed accordingly.

EM22 – "Timely and efficient distribution of Notice to Mariners (NtM), Kingfisher Bulletin publications and other navigational warnings of the position and nature of works associated with the Proposed Development." We would like to see any such information are shared with fishing industry with enough time in advance to ensure no disruption is caused to fishing industry.

As part of the measures, there is not measure for disruption payments for the fishing vessels. "Consideration of the principle of cooperation agreements in instances where static gears may be required to be temporarily relocated." SFF suggest that the cooperation agreement should be considered for the static and mobile gears where they are required to be relocated.

Best regards

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

Sports Scotland

From:	Gillian Kyle
To:	MD Marine Renewables
Subject:	RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Date:	31 October 2023 09:39:08
Attachments:	image001.png

Morning,
I have reviewed this and have no comment to make.
Gillian

Gillian Kyle | Planner | **sport**scotland
Doges | Templeton on the Green | 62 Templeton Street | Glasgow | G40 1DA

[Redacted]

w: www.sportscotland.org.uk
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spòrsalba - am buidheann nàiseanta airson spòrs

Awarding funds from The National Lottery

From: EPlanning <EPlanning@sportscotland.org.uk>
Sent: Thursday, October 26, 2023 3:57 PM
To: Gillian Kyle <Gillian.Kyle@sportscotland.org.uk>
Subject: FW: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Hi Gill – would you be able to have a quick look at this please? Thanks, Lorraine

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: Thursday, October 26, 2023 9:55 AM
To: MD.MarineRenewables@gov.scot
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: [EXTERNAL] RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Good morning,
Kind reminder that if you wish to submit any representations in response to the above consultation, I would be grateful if they could be forwarded to me in an electronic format (MD.MarineRenewables@gov.scot) by **03 November 2023**.
Kind Regards
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

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From: MD Marine Renewables
Sent: Wednesday, October 4, 2023 2:00 PM
To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Cc: John Mckay <John.Mckay@gov.scot>; Kirsty Black <Kirsty.Black@gov.scot>
Subject: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
(collectively referred to as the "EIA Regulations").
SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Buchan Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at:
https://marine.gov.scot/node/24504

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment ("EIA") Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project**. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

Please submit your response electronically to MS.MarineRenewables@gov.scot by **03 November 2023**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Many thanks,

Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

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gus seirbheisean a lìbhrigeadh no conaltradh ribh. Feuch gun tèid sibh gu https://sportscotland.org.uk/privacy/ airson tuilleadh fiosrachaidh mu làimhseachadh air an dàta phearsanta agaibh.

Scottish and Southern
Electricity Networks

From:	Kirk, Willie on behalf of Transmission Asset Management (SSE)
To:	MD Marine Renewables
Cc:	John Mckay; Kirsty Black
Subject:	RE: TPE-SUB-103 [EXTERNAL] RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Date:	03 November 2023 14:09:57
Attachments:	image001.png image002.png

Hi

Thanks for contacting us at Transmission Asset Management. We are exceptionally busy, so I've only just picked this up today.

I have no comments but will forward internally so you may get some late comments from my colleagues.

Any concerns, feel free to contact us.

Best regards

Will

Transmission.asset.Management@sse.com

Scottish & Southern Electricity Networks
TRANSMISSION

Will Kirk
Asset Engineer
01738 342 634
[Redacted]

SSEN Transmission – Asset Engineering Team
Grampian House, 200 Dunkeld Road, Perth, PH1 3AQ
www.ssen-transmission.co.uk

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: Thursday, October 26, 2023 9:55 AM
To: MD.MarineRenewables@gov.scot
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: TPE-SUB-103 [EXTERNAL] RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Phishing' button.

Good morning,

Kind reminder that if you wish to submit any representations in response to the above consultation, I would be grateful if they could be forwarded to me in an electronic format (MD.MarineRenewables@gov.scot) by **03 November 2023**.

Kind Regards
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

The Scottish Government

From: MD Marine Renewables
Sent: Wednesday, October 4, 2023 2:00 PM
To: MD Marine Renewables <MD.MarineRenewables@gov.scot>
Cc: John Mckay <John.Mckay@gov.scot>; Kirsty Black <Kirsty.Black@gov.scot>
Subject: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023

Dear Sir/Madam,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017
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SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site

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Please submit your response electronically to MS.MarineRenewables@gov.scot by **03 November 2023**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Many thanks,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
[Redacted]

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Transport Scotland

Development Management and Strategic Road Safety
Roads Directorate

George House 36 North Hanover St Glasgow G1 2AD
Direct Line: 0141 272 7593, Fax: 0141 272 7350
Iain.clement@transport.gov.scot

TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

Iain MacDonald
Marine Scotland
Scottish Government
Aberdeen
AB11 9DB

MS.MarineRenewables@gov.scot

Your ref:
SCOP-0031

Our ref:
GB01T19K05

Date:
25/10/2023

Dear Sirs,

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

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SCOP-0031 - BUCHAN OFFSHORE WINDFARM LIMITED – BUCHAN OFFSHORE WIND – SCOTWIND NE8 SITE

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

This information has been passed to SYSTRA Limited (SYSTRA) for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

Proposed Development

The proposed development comprises up to 70 wind turbines with a blade tip height above the lowest astronomical tide (LAT) no greater than 355m as well as up to 3 offshore substation platforms, located northeast of Fraserburgh approximately 75km from the Aberdeenshire coast. The nearest trunk road to the site is the A90(T) at Fraserburgh.

Assessment of Environmental Impacts

The SR states that that the application is for the offshore elements of the development only, with consent for the onshore aspects being secured through a separate planning application supported by a separate Onshore EIA Scoping Report.

The SR relates to the proposed Section 36 consent and marine licence application which covers the Offshore Generation Infrastructure (OGI) located in the Array Area. We note that no mention is made within the SR of any Traffic and Transport aspects associated with the construction of the development, consequently, it is assumed that this topic is to be scoped out of the forthcoming Environmental Impact Assessment (EIA).

In the event that development components are to be transported to ports via the trunk road network prior to being shipped to the site, Transport Scotland would seek the potential impact of any increase in traffic volumes on the trunk road be included in the onshore assessment.

I trust that the above is satisfactory but should you wish to discuss in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office who can be reached on 0141 343 9636.

Yours faithfully

[Redacted]

Iain Clement

Transport Scotland
Roads Directorate

cc Alan DeVenny – SYSTRA Ltd.

UK Chamber of Shipping

From:	Robert Merrylees
To:	MD Marine Renewables
Cc:	John Mckay; Kirsty Black
Subject:	RE: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Date:	26 October 2023 10:15:26
Attachments:	image001.png

Dear Marine Scotland,

The UK Chamber of Shipping welcomes the opportunity to respond to the Scoping Report for Buchan Offshore Wind farm.

The Chamber has singularly read and reviewed Chapter 13 Shipping and Navigation and offers the following responses to the set questions:

- Do you agree that the relevant guidance and data sources (including surveys) upon which the assessment should be based have been identified?
    - Yes. The Chamber supports an additional 12 months of high fidelity AIS data and long term MAIB and RNLI accident data.

- Do you agree with the proposed shipping and navigation study area and that it is sufficient to capture the relevant impacts?
    - Yes 10nm is industry standard for study area. However, the Chamber does not consider the 30nm suggested search area for cumulative impact to be sufficient and would like to see a 50nm area examined. This is consistent with other large scale projects.

- Do you agree that all of the impacts which will be assessed within the NRA have been identified?
    - The Chamber wishes to see loss of station of turbines risk scoped into the O&M phase

    - The Chamber wishes to see Impact on wet storage/marshalling areas scoped into the O&M and Decommissioning phases as may be utilised

- Do you agree with the proposed methodological approach to the NRA and EIA (including impact assessment)?
    - As industry standard. At NRA stage the Chamber wishes to see plots showing combination of commercial vessel types, (e.g. tanker & cargo & ferry) to give better overall picture of vessel density and activity.

    - The Chamber notes in 13.10 that potential transboundary effects will be examined, which is correct, however we see no detail nor clarity on how they will be assessed during the EIA.

- Do you agree that the outlined embedded mitigation measures are appropriate and likely to sufficiently mitigate potential risks and/or impacts?
    - In general the embedded mitigations are as would be expected, however the Chamber will not comment to their suitability or sufficiency to mitigate risk/impact until the NRA phase or later and reserves right to suggest additional mitigations that may be required.

EM46 – the Chamber expects that agreement will be reached with MCA and NLB on layout and not that the organisations are consulted with

- The Chamber does not see a commitment to maintain a certain Under Keel Clearance should catenary mooring with buoyancy units be used and would expect one.

- Do you agree that appropriate consultees been identified?
  - Yes, however the Chamber asserts that "Commercial regular runners/operators" should also include tanker, cargo and other commercial vessel owner/operators who transit the area.

- Do you agree with the proposed approach to considering cumulative impacts?
  - As above, the Chamber does not consider the 30nm suggested search area for cumulative impact to be sufficient and would like to see a 50nm area examined. This is consistent with other large scale projects.

The Chamber trusts these comments are of good use and would be happy to provide further detail to Marine Scotland or the developer where appropriate.
Kind regards,
Robert

Robert Merrylees
Policy Manager (Safety & Nautical) & Analyst
UK Chamber of Shipping
30 Park Street, London, SE1 9EQ
DD +44 (0) 20 7417 2843
[Redacted]
rmerrylees@ukchamberofshipping.com
www.ukchamberofshipping.com

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: Wednesday, October 4, 2023 2:00 PM
To: MD.MarineRenewables@gov.scot
Cc: John.Mckay@gov.scot; Kirsty.Black@gov.scot
Subject: SCOP-0031 - Buchan Offshore Windfarm Limited – Buchan Offshore Wind – Scotwind NE8 Site - Scoping Consultation - Response Required by 03 November 2023
Dear Sir/Madam,
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(collectively referred to as the "EIA Regulations").

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Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Many thanks,

Iain

Iain MacDonald

Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

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