



Morven South Offshore Wind Array Project

Environmental Impact Assessment Report

Volume 1, Chapter 5: Consultation

MVCNS-J1201-RPS-10093
May 2026

B01

| Document status | | | | | |
|------------------------|----------------------------|--------------------|----------------|--------------------|-------------|
| Version | Purpose of document | Authored by | Checker | Approved by | Date |
| FINAL | Application | TTRPSEL | TTRPSEL | MvOWL | May 2026 |

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by Tetra Tech RPS Energy Ltd, any of its subsidiaries, or a related entity (collectively 'Tetra Tech RPS Energy') no part of this report should be reproduced, distributed or communicated to any third party. Tetra Tech RPS Energy does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report.

The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report. The report has been prepared using the information provided to Tetra Tech RPS Energy by its client, or others on behalf of its client.

To the fullest extent permitted by law, Tetra Tech RPS Energy shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by Tetra Tech RPS Energy, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to Tetra Tech RPS Energy without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by:

TTRPSEL

Prepared for:

Morven Offshore Wind Limited

Table of contents

| | | |
|----------|---|----------|
| 5 | Consultation | 1 |
| 5.1 | Introduction..... | 1 |
| 5.2 | Purpose of the chapter | 1 |
| 5.3 | Legislative and policy context | 2 |
| 5.4 | Good practice in consultation | 4 |
| 5.5 | Environmental Impact Assessment stakeholder engagement..... | 7 |
| 5.6 | Other stakeholder engagement..... | 12 |
| 5.6.1 | Pre-application Consultation..... | 12 |
| 5.6.2 | Stakeholder Engagement Manager | 12 |
| 5.6.3 | Fisheries Liaison Officer..... | 13 |
| 5.6.4 | Information provision, project website and digital information..... | 13 |
| 5.6.5 | Community participation..... | 13 |
| 5.7 | Feedback and reporting | 13 |
| 5.8 | References | 14 |

List of tables

| | | |
|------------|--|---|
| Table 5.1: | Summary of provisions within the Aarhus Convention relevant to stakeholder consultation | 2 |
| Table 5.2: | Summary of provisions within the Environmental Impact Assessment Directive 2011/92/EU (as amended by Directive 2014/52/EU) and Regulations relevant to stakeholder consultation..... | 3 |
| Table 5.3: | Guiding principles for stakeholder consultation | 5 |
| Table 5.4: | Pre-Application Consultation principles considered within this Morven South Environmental Impact Assessment Report | 5 |
| Table 5.5: | List of the Scoping workshops which informed the Morven Site Scoping Report..... | 7 |
| Table 5.6: | Summary of key consultation letters issued to stakeholders | 9 |

5 Consultation

5.1 Introduction

- 5.1.1.1 This chapter of the Morven South Offshore Wind Array Project (hereafter “Morven South”) Environmental Impact Assessment (EIA) Report (hereafter, the EIA Report) presents the consultation and stakeholder engagement undertaken during the pre-application phase for Morven South by Morven Offshore Wind Limited (MvOWL) (hereafter “the Applicant”).
- 5.1.1.2 Marine Directorate – Licensing Operations Team (MD-LOT) advise applicants to “begin engagement with a comprehensive range of relevant stakeholders early enough for their advice to be given and any matters raised to have been properly considered” (MD-LOT, 2025). The Applicant has aligned with this advice, with an overview of consultation and stakeholder engagement principles and activities undertaken up to the point of submission of this Morven South EIA Report provided in this chapter.
- 5.1.1.3 Thorough engagement and consultation have been undertaken with both statutory and non-statutory stakeholders and the Applicant has considered all pre-application stage feedback gathered within the Morven South EIA Report. The Applicant will continue to engage with stakeholders during the post-application and post-consent phases to further inform decision making and project design as Morven South is further developed.
- 5.1.1.4 It should be noted that consultation approaches and outcomes relating to the Habitats Regulations Appraisal (HRA), Report to Inform Appropriate Assessment and Derogation case for Morven South are outlined separately in the respective documents. The information contained in this chapter relates to consultation undertaken during the pre-application phase of Morven South for the purposes of the EIA Report only.

5.2 Purpose of the chapter

- 5.2.1.1 This chapter, alongside Volume 3, Annex 5.1: Consultation, summarises:
- the policy and legislative context for consultation undertaken during the pre-application phase;
 - the principles of consultation and stakeholder engagement followed during the pre-application phase;
 - the stakeholders consulted and key feedback received during the pre-application phase.
- 5.2.1.2 Key stakeholder consultation and feedback received as pertains to specific topics is included within the relevant discipline chapters of the Morven South EIA Report (Volume 2, Chapters 7 to 21).
- 5.2.1.3 In addition to Volume 3, Annex 5.1: Consultation, other annexes have been appended to this application to provide further information and context on collaborative efforts and stakeholder engagement. These include the following:
- Volume 3, Annex 5.2: Offshore Ornithology Impact Estimates using Natural England Approaches;
 - Volume 3, Annex 13.2: East Region Developers Group Cumulative Baseline for Shipping and Navigation;
 - Volume 3, Annex 5.3: Community Engagement Statement.
- 5.2.1.4 The Marine Licensing (Pre-application Consultation) (Scotland) Regulations 2013 require Pre-Application Consultation (PAC) to be undertaken for applications which are located within Scottish Territorial Seas (0nm to 12nm). As noted in Volume 1, Chapter 1: Introduction, Morven South is located in Scottish offshore waters (12nm to 200nm), therefore, these regulations do not apply to Morven South. However, the principles of the PAC Regulations have been considered and applied, where appropriate, throughout the consultation process as they are considered good practice for undertaking public engagement.

5.3 Legislative and policy context

- 5.3.1.1 Policy and legislation on renewable energy infrastructure is presented in Volume 1, Chapter 2: Policy and Legislation. Legislation specific to stakeholder consultation is contained in the Aarhus Convention (United Nations Economic Commission for Europe (UNECE)) documents (UNECE, 2025) and the EIA Regulations (collectively referring to the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (HM Government, 2017), and the Marine Works (Environmental Impact Assessment) Regulations 2007 (HM Government, 2007)). These legal instruments represent best practice for consultation with members of the public on major projects.
- 5.3.1.2 A summary of the legislative provisions relevant to stakeholder engagement and consultation are provided in Table 5.1 and Table 5.2 below.

Table 5.1: Summary of provisions within the Aarhus Convention relevant to stakeholder consultation

| Summary of relevant legislation | How and where considered in the EIA report |
|--|---|
| General | |
| <p>The Aarhus Convention sets down basic rules to promote the participation of the public in environmental matters and to improve the enforcement of environmental law (UNECE, 2025). It entered into force in October 2001. Parties to the Convention are required to make provisions to allow public authorities and individuals rights as part of the principles of participative democracy (UNECE, 2025).</p> | <p>This Morven South EIA Report is available digitally at https://www.morven-south-eia.com. Electronic copies will be accessible to the public in multiple public locations (e.g. local libraries). The final locations of these copies will be agreed with MD-LOT in advance of the submission of the Morven South EIA Report and advertised via public notices as appropriate.</p> |
| Access to information | |
| <p>Article 4 of the Aarhus Convention establishes the right of members of the public to receive environmental information held by public authorities. Article 5 of the Aarhus Convention sets out that public authorities are obliged to collect environmental information, maintain and keep it up to date, and make it accessible to effectively disseminate it to the public.</p> | <p>This Morven South EIA Report is available digitally at https://www.morven-south-eia.com. Electronic copies will be accessible to the public in multiple public locations (e.g. local libraries). The final locations of these copies will be agreed with MD-LOT in advance of the submission of the Morven South EIA Report and advertised via public notices as appropriate.</p> |
| Public participation in environmental decision making | |
| <p>Article 6 of the Aarhus Convention establishes the right to participate in environmental decision-making involving the activities listed in Annex I to the Convention and activities that are not listed in the Annex but may have a significant effect on the environment. Public authorities are required to make arrangements to enable the public and non-governmental organisations to comment on plans or programmes relating to the environment.</p> | <p>This Morven South EIA Report is available digitally at https://www.morven-south-eia.com. Electronic copies will be accessible to the public in multiple public locations (e.g. local libraries). The final locations of these copies will be agreed with MD-LOT in advance of the submission of the Morven South EIA Report and advertised via public notices as appropriate.</p> |
| <p>Article 6 of the Aarhus Convention also outlines the right for comments from the public to be taken into account in decision making, and information on the final decision and reasons for it to be made available (UNECE, 2025).</p> <p>This part of the Aarhus Convention has been implemented in European Union (EU) Directive</p> | <p>The decision-making process for Morven South has considered consultation responses/feedback provided through the Morven Option Lease Agreement Site Scoping Opinion (hereafter "Morven Site Scoping Opinion") and during the pre-application phase. This is detailed in this chapter, alongside Volume 3, Annex 5.1: Consultation which provides a log of consultation undertaken.</p> |

| Summary of relevant legislation | How and where considered in the EIA report |
|--|---|
| 2003/4/EC on Public Access to Environmental Information. | |
| Access to justice in environmental matters | |
| Article 9 of the Aarhus Convention establishes the right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general (Aarhus Centres, 2025). | This is implemented in Scotland via Judicial Review processes and the availability of relevant statutory challenge. |
| Article 6, paragraph 5 of the Aarhus Convention states that “Each Party should, where appropriate, encourage prospective applicants to identify the public concerned, to enter into discussions, and to provide information regarding the objectives of their application before applying for a permit” (UNECE, 2025). | Throughout the pre-application phase the Applicant has provided opportunity for public participation in consultation and decision making for Morven South. This information has been provided in various formats to ensure that it is accessible to a range of audiences. The Applicant is committed to providing opportunity for public participation post-application. The Non-Technical Summary of this Morven South EIA Report provides information on the application in an accessible and proportionate format for the public and non-specialists. |

Table 5.2: Summary of provisions within the Environmental Impact Assessment Directive 2011/92/EU (as amended by Directive 2014/52/EU) and Regulations relevant to stakeholder consultation

| Summary of relevant legislation | How and where considered in the EIA report |
|--|---|
| <p>Article 1(g) of Directive 2014/52/EU states that an EIA means a process which includes the carrying out of consultation as referred to in Article 6 and, where relevant, Article 7.</p> <p>Transposed by:</p> <ul style="list-style-type: none"> • Regulation 4(b) of Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (HM Government, 2017); • Regulation 4(a) of Marine Works (Environmental Impact Assessment) Regulations 2007(HM Government, 2007). | This is considered throughout the Morven South EIA Report, within this chapter and each topic chapter (Volume 2, Chapters 7 to 21). |
| <p>Article 6(3) of Directive 2011/92/EU (as amended by Directive 2014/52/EU) requires that a copy of the EIA application/report, and any additional information supplied by the Applicant, is made available, as soon as reasonably possible, for consultation.</p> <p>Transposed by:</p> <ul style="list-style-type: none"> • Regulation 16(1) of Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (HM Government, 2017); • Regulation 17(1) of Marine Works (Environmental Impact Assessment) Regulations 2007 (HM Government, 2007). | This Morven South EIA Report is available digitally at https://www.morven-south-eia.com . Electronic copies will be accessible to the public in multiple public locations (e.g. local libraries). The final locations of these copies will be agreed with MD-LOT in advance of the submission of the Morven South EIA Report and advertised via public notices as appropriate. |

| Summary of relevant legislation | How and where considered in the EIA report |
|--|---|
| <p>Article 6(2) to (5) of Directive 2011/92/EU (as amended by Directive 2014/52/EU) states that if an EIA report is submitted in relation to an EIA application, the Applicant must inform the public via public notice(s), or other appropriate means, of application details and locations where copies of the EIA report are available for inspection.</p> <p>Transposed by:</p> <ul style="list-style-type: none"> • Regulations 18(1) and (2) of Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (HM Government, 2017); • Regulations 12(3) and 16(1) and (2) of Marine Works (Environmental Impact Assessment) Regulations 2007 (HM Government, 2007). | <p>This Morven South EIA Report is available digitally at https://www.morven-south-eia.com. Electronic copies will be accessible to the public in multiple public locations (e.g. local libraries). The final locations of these copies will be agreed with MD-LOT in advance of the submission of the Morven South EIA Report and advertised via public notices as appropriate.</p> |

5.4 Good practice in consultation

5.4.1.1 The Applicant has carried out consultation with statutory and non-statutory consultees and members of the public throughout the development of this Morven South EIA Report, following the principles and good practice set out below:

- Marine licensing and consenting guidance (MD-LOT, 2025);
- the Gunning Principles (Hodgson, 1985).

5.4.1.2 Engagement with stakeholders has been undertaken by the Applicant throughout the pre-application phase, as per the MD-LOT guidance outlined in paragraph 5.1.1.2. MD-LOT guidance also notes that the Applicant should “ensure that stakeholders are updated on how advice has helped inform design solutions or mitigation, including any reasons why it did not affect a design or mitigation change” (MD-LOT, 2025). Stakeholder feedback and how and where this has been considered in the development of this Morven South EIA Report, is outlined in the topic chapters (Volume 2, Chapters 7 to 21) and Volume 3, Annex 5.1: Consultation. This is further discussed in Section 5.5.

5.4.1.3 The Gunning Principles were proposed in 1985 and accepted by the Mr. Justice Hodgson in the Gunning case¹. These Principles, which should be followed for consultation to be “fair and worthwhile”, are:

- proposals must still be at a formative stage when consultation take place;
- proposals must include sufficient information to facilitate intelligent consideration and thus an informed response;
- adequate time must be given for consideration and response;
- consultation responses must be conscientiously considered as part of the decision-making process.

5.4.1.4 The Applicant has adopted a series of guiding principles for stakeholder consultation in relation to Morven South which comply with the Gunning Principles outlined in paragraph 5.4.1.3. These are described in Table 5.3 below and have been considered during the pre-application phase for Morven South.

¹ *R v London Borough of Brent ex parte Gunning* [1985] LGR 168

Table 5.3: Guiding principles for stakeholder consultation

| Guiding Principle | Justification |
|-------------------|---|
| Accessible | Information should be provided to stakeholders or stakeholder groups in a format which is easy to access. Information should avoid use of technical jargon, as far as possible, to ensure it can be communicated in a way that is appropriate to and understandable by the stakeholder group. The Applicant should ensure that the consultation process is inclusive and easy to participate in for all stakeholders. |
| Meaningful | Stakeholders should be afforded a real opportunity to influence development of Morven South, via a two-way consultation process. All feedback received through the stakeholder consultation process should be reviewed and considered by the Applicant and used, as far as reasonably practicable, to inform key decisions. |
| Transparent | The stakeholder consultation process shall be undertaken in a transparent way to ensure that stakeholders understand how their feedback has been considered within the Morven South EIA Report. |
| Proportionate | Communication should be proportionate to the proposals for Morven South and the potential for impact on receptors. |
| Accountable | The Applicant will be accountable for ensuring that all stakeholder feedback has been considered and recorded. This includes keeping records of consultation activities and feedback, and how this has been considered in the development of the Morven South EIA Report. |

5.4.1.5 Paragraph 5.2.1.4 notes that the PAC Regulations do not apply for Morven South, however, the principles of the PAC Regulations have been considered throughout the development of this Morven South EIA Report, as outlined in Table 5.4.

Table 5.4: Pre-Application Consultation principles considered within this Morven South Environmental Impact Assessment Report

| PAC Regulations Principles | How and where addressed in this Morven South EIA Report |
|---|--|
| <p>Regulation 5(1): "The prospective applicant for a marine licence who considers that the activity in respect of which a licence may, or is to, be sought which may, or is to, be of a class or description prescribed in regulation 4 may notify the Scottish Ministers requiring a pre-application consultation statement from them".</p> <p>Regulation 6(2): "The prospective applicant for a marine licence must give notification that an application for a marine licence is to be submitted to:</p> <p>(a) the Commissioners of Northern Lighthouses (Northern Lighthouse Board (NLB));</p> <p>(b) the Maritime and Coastguard Agency (MCA);</p> <p>(c) the Scottish Environment Protection Agency (SEPA);</p> <p>(d) Scottish Natural Heritage (now NatureScot); and</p> | <p>The Applicant has undertaken consultation in the development of this Morven South EIA Report with the MCA, NLB, NatureScot and other marine delegates. Section 5.5 highlights key consultation undertaken to date, with further information provided in the topic chapters (Volume 2, Chapters 7 to 21) and Volume 3, Annex 5.1: Consultation.</p> <p>It should be noted that SEPA were consulted as part of the statutory consultation process undertaken by Scottish Ministers for the purposes of providing a Scoping Opinion for the Morven Site Scoping Report. However, SEPA highlighted that matters relating to Morven South were outside of their remit as Morven South is located in Scottish offshore waters (12nm to 200nm). Therefore, no further consultation with SEPA with regard to Morven South was undertaken.</p> |

| PAC Regulations Principles | How and where addressed in this Morven South EIA Report |
|--|---|
| <p>(e) any delegate for a marine region where the application for a marine licence is for an activity which is to be carried out wholly or partly in that region.” (HM Government, 2013)</p> | |
| <p>Regulation 7(1): “The prospective applicant for a marine licence must: (a) hold at least one pre-application consultation event at which those persons mentioned in regulation 6(2), and members of the public, may provide comments to the prospective applicant as regards the licensable marine activity to which the application for a marine licence is to relate”. (HM Government, 2013)</p> | <p>The Applicant has held a series of Scoping workshops for the Morven Site with relevant stakeholders (including the MCA, NLB, NatureScot and other marine delegates) which presented a summary of the information gathered as part of the development of the Morven Site Scoping Report (paragraphs 5.5.1.3 and 5.5.1.4). In addition, the Applicant also held an online information session, and an in-person Public Information Day, with accompanying virtual exhibition hall, to provide information to the public and stakeholders on Morven South (Section 5.6.1; Volume 3, Annex 5.3: Community Engagement Statement).</p> |
| <p>Regulation 7(1): “The prospective applicant for a marine licence must: (b) publish in a local newspaper a notice containing: (i) a description, including the location of the licensable marine activity for which the marine licence is to be sought; (ii) details as to where further information may be obtained concerning the proposed licensable marine activity; (iii) the date and place of the pre-application consultation event; (iv) a statement explaining how persons wishing to provide comments to the prospective applicant relating to the proposed licensable marine activity may do so, and the date by which this must be done; and (v) a statement that comments made to the prospective applicant are not representations to the Scottish Ministers and that if the prospective applicant makes an application for a marine licence that there will be an opportunity for representations to be made to the Scottish Ministers on the application.” (HM Government, 2013) Additional notification may be provided via press releases, mail drops, online newspapers, social media, email distribution lists, and/or via the Applicant’s website.</p> | <p>The Applicant published information of the upcoming Public Information Day via their website, email drops to stakeholders, advertisements in ‘The Bellman’ (a community newspaper in Stonehaven), and physical posters displayed in local venues, which included the location, date, and details of where further information could be obtained. A link was also provided to direct the public and stakeholders to a virtual exhibition hall where information about Morven South could be found and comments could be made via a web form, as well as via email, telephone or post (MvOWL, 2026). Details were also provided for the online information session. See Section 5.6.1 and Volume 3, Annex 5.3: Community Engagement Statement for further details of these events.</p> |

5.5 Environmental Impact Assessment stakeholder engagement

- 5.5.1.1 The Applicant has undertaken statutory and non-statutory consultation with respect to the Morven South EIA Report in order to gather advice, understand stakeholder concerns and develop appropriate mitigation measures. The Applicant has regularly engaged with stakeholders throughout the pre-Scoping and pre-application phases via virtual and face-to-face meetings, email correspondence, and provision of meeting minutes, advice notes and other digital documentation.
- 5.5.1.2 The Applicant has had regular quarterly meetings with MD-LOT since 2022. As noted in MD-LOT guidance (MD-LOT, 2025), these meetings between MD-LOT and the Applicant have provided an opportunity for the Applicant to disseminate project updates and upcoming milestones for MD-LOT's awareness, and for MD-LOT to provide advice on regulatory and consenting matters and updates on regulatory guidance. NatureScot were also invited to attend these meetings to disseminate any relevant updates where required. The Applicant issued meeting minutes to MD-LOT and other attendees where applicable following the meetings to ensure an agreed and accurate record of meetings was maintained throughout the pre-application phase.
- 5.5.1.3 MD-LOT guidance (MD-LOT, 2025) also advises prospective applicants to hold a Scoping workshop to allow early engagement with stakeholders and incorporate technical advice into the EIA Scoping Report ahead of its submission to MD-LOT for statutory consultation. The Applicant arranged a series of Scoping workshop sessions on key topics with relevant stakeholders on 18 and 19 April 2023. The key topics discussed in the Scoping workshops were decided through consideration of pre-Scoping engagement, survey results obtained pre-Scoping, expected impact pathways, general project updates, and baseline data. These workshops presented a summary of the information gathered as part of the development of the Morven Site Scoping Report including the proposed scope of the EIA, available datasets, baseline environment and proposed approach to assessment. These workshops are listed below in Table 5.5.

Table 5.5: List of the Scoping workshops which informed the Morven Site Scoping Report

| Date | Topics covered | Consultees in attendance |
|---------------|--|--|
| 18 April 2023 | Physical processes, benthic subtidal ecology and Marine Protected Areas (MPAs), fish and shellfish ecology and Habitats Regulations Appraisal (HRA) approach | <ul style="list-style-type: none"> Marine Directorate – Science, Evidence, Digital and Data (MD-SEDD) (formerly Marine Scotland Science (MSS)) MD-LOT NatureScot |
| 18 April 2023 | Shipping and navigation | <ul style="list-style-type: none"> Chamber of Shipping (CoS) Forth Ports MCA MD-LOT Montrose Port NLB Royal Yachting Association (RYA) Scotland |
| 18 April 2023 | Marine mammals, underwater sound and HRA approach | <ul style="list-style-type: none"> MD-LOT MD-SEDD NatureScot |
| 18 April 2023 | Commercial fisheries | <ul style="list-style-type: none"> MD-LOT MD-SEDD |

| Date | Topics covered | Consultees in attendance |
|---------------|--|--|
| | | <ul style="list-style-type: none"> • North and East Coast Regional Inshore Fisheries Group (N&EC RIFG) • Scottish Fishermen’s Federation (SFF) • Scottish Pelagic Fishermen’s Association (SPFA) • Scottish White Fish Producers Association (SWFPA) |
| 18 April 2023 | Seascape, Landscape and Visual Impact Assessment (SLVIA) and onshore heritage assets | <ul style="list-style-type: none"> • Aberdeen City Council |
| 19 April 2023 | Offshore ornithology and HRA | <ul style="list-style-type: none"> • MD-LOT • MD-SEDD • NatureScot • Royal Society for the Protection of Birds (RSPB) |
| 19 April 2023 | Socio-economics | <ul style="list-style-type: none"> • Aberdeen City Council • Aberdeenshire Council • City of Edinburgh Council • Energy Transition Zone (ETZ) Ltd. • Forth Ports • MD-LOT • Scottish Enterprise • Scottish Government’s Marine Analytical Unit (MAU) |

5.5.1.4 Feedback received in the Scoping workshops informed the Morven Site Scoping Report (MD-LOT, 2023), allowing early consideration of additional impacts to be scoped into the assessment, agreement of data sources to be used and the methodology and approaches to be followed. The Applicant submitted the Morven Site Scoping Report to MD-LOT in July 2023. Scottish Ministers reviewed the Morven Site Scoping Report and it was also issued to stakeholders for formal consultation. The Morven Site Scoping Opinion was issued by MD-LOT to the Applicant in November 2023.

5.5.1.5 During the pre-application phase, the Applicant has continued to consult with stakeholders on key issues raised as part of the Morven Site Scoping Opinion consultation responses. Dedicated face-to-face and virtual (via Microsoft Teams) meetings and workshops were held with stakeholders to discuss key issues where possible and stakeholder availability allowed. Email correspondence was also used to engage with stakeholders, for example, to issue meeting materials and minutes, advice notes, consultation letters and other documentation, where required. Volume 3, Annex 5.1: Consultation outlines all consultation discussions and feedback received and logged by the Applicant during the pre-application phase.

5.5.1.6 Table 5.6 provides a summary of consultation letters issued to stakeholders for various topics throughout the pre-application phase, to gather further information and address issues raised in the Morven Site Scoping Report. Further information on these consultation letters and how feedback received was incorporated into the Morven South EIA Report can be found in the topic chapters (Volume 2, Chapters 7 to 21) and Volume 3, Annex 5.1: Consultation.

Table 5.6: Summary of key consultation letters issued to stakeholders

| Date of issue | Topic(s) | Consultation letter subject | Consultees issued to |
|---------------|--|--|---|
| March 2023 | Shipping and navigation | Stakeholder Consultation on Impacts Relating to Shipping and Navigation for the Proposed Morven Offshore Wind Farm | Shipping companies identified as Regular Operators via Automatic Identification System (AIS) and site survey data (see Volume 3, Annex 13.1: Shipping and Navigation Shared Navigational Risk Assessment for all recipients). |
| November 2023 | Socio-economics | Request to remove advice provided on social impacts and community engagement from the Morven Site Scoping Opinion | <ul style="list-style-type: none"> MD-LOT; MAU. |
| March 2024 | Offshore ornithology, benthic ecology (blue carbon) and fish and shellfish ecology | Request for further advice following the issue of the Morven Offshore Wind Array Project Scoping Opinion | <ul style="list-style-type: none"> NatureScot |
| March 2024 | Offshore ornithology | Request for further advice following the issue of the Morven Offshore Wind Array Project Scoping Opinion | <ul style="list-style-type: none"> Natural England |
| May 2024 | Physical processes | Physical Processes Stratification Method Statement (and Addendum A to this document issued separately) | <ul style="list-style-type: none"> MD-LOT; MD-SEDD. |
| December 2024 | Commercial fisheries | Technical note on the revised approach to scoping in impacts to the commercial fisheries assessment | <ul style="list-style-type: none"> N&EC RIFG; SFF; SPFA; SWFPA. |
| December 2024 | Offshore ornithology | Request for confirmation of and advice on the proposed modelling and EIA methodologies | <ul style="list-style-type: none"> NatureScot. |
| March 2025 | All topics (consenting approach) | Targeted consultation letter: Revised consenting strategy for Morven North and Morven South | <ul style="list-style-type: none"> MD-LOT. |
| April 2025 | Commercial fisheries | Baseline data collection questionnaires | Various commercial fisheries stakeholders including SFF, SWFPA, SPFA, fisheries organisations and associations and individual fishers (see Volume 3, Annex 12.1: Commercial Fisheries Shared Technical Report for a summary of all recipients). |

| Date of issue | Topic(s) | Consultation letter subject | Consultees issued to |
|---------------|----------------------------------|--|---|
| May 2025 | Offshore ornithology | Request for confirmation of and advice on the proposed approach to the cumulative and in-combination assessments for displacement | <ul style="list-style-type: none"> NatureScot. |
| July 2025 | Aviation (military and civil) | Request to scope out the Hill of Dudwick Weather Radar from the Morven South EIA Report | <ul style="list-style-type: none"> Met Office. |
| August 2025 | Marine archaeology | Request to scope out direct damage to deeply buried marine archaeology receptors from the Morven South EIA Report | <ul style="list-style-type: none"> Historic Environment Scotland (HES). |
| October 2025 | Marine mammals | Underwater sound and marine mammal cumulative effects assessment approach | <ul style="list-style-type: none"> NatureScot; MD-LOT. |
| December 2025 | All topics (consenting approach) | Morven Offshore Wind Farm – Concerning five year consent implementation period limitation and request for a longer period to implement consent | <ul style="list-style-type: none"> MD-LOT. |
| January 2026 | Commercial fisheries | Consultation on draft Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) prior to application submission | <ul style="list-style-type: none"> N&EC RIFG; SFF; SPFA; SWFPA. |

5.5.1.7 As outlined in Table 5.6 above, the Applicant consulted with MD-LOT via consultation letter to outline the changes to the consenting approach following receipt of the Morven Site Scoping Opinion. As further discussed in Volume 1, Chapter 1: Introduction, the Applicant continued to develop and evolve the Morven Site following receipt of the Morven Site Scoping Opinion and made the decision to consent the Morven Site as two distinct array projects, Morven North and Morven South. This was primarily driven by the requirement for flexibility due to ongoing uncertainty around grid connection dates for the two distinct grid connection Points of Connection (POCs), Branxton in East Lothian and Hawthorn Pit in County Durham. Morven Hawthorn Pit Grid Connection Project (hereafter, “MHPGC Project”) and Morven Branxton Area Grid Connection Project (hereafter, “MBAGC Project”) will be subject to separate consents and EIA Reports, but the MHPGC Project and MBAGC Projects have been considered as far as possible at the time of writing as part of the whole project assessments and Cumulative Effects Assessment (CEA) in this Morven South EIA Report (see Volume 1, Chapter 6: EIA Methodology).

5.5.1.8 The separation of the Morven Site into Morven North and Morven South and the updated consenting approach was first raised with MD-LOT in quarterly meetings and correspondence between July 2024 and November 2024. The Applicant noted during this period that they did not intend to submit new EIA Scoping Reports for Morven North and Morven South as the infrastructure associated with Morven North and Morven South was not substantially different to that outlined in the Morven Site

Scoping Report, rather the infrastructure outlined was to be allocated to either Morven North or Morven South. MD-LOT requested further information from the Applicant on their approach and evidence that new EIA Scoping Reports were not required in order to provide feedback. This was outlined in the targeted consultation letter issued to MD-LOT in March 2025, ahead of the March 2025 quarterly meeting.

- 5.5.1.9 Feedback provided in April 2025 by MD-LOT noted contentment with the proposed approach outlined in the targeted consultation letter but flagged that the Applicant should consult further with NatureScot with regard to the cumulative effects and in-combination assessment. A consultation letter was issued in May 2025, as outlined in Table 5.6. Feedback was provided in June 2025 by NatureScot, noting general acceptance of the proposed approach, and further discussion with NatureScot and MD-LOT on topic-specific approaches for marine mammals, shipping and navigation and offshore ornithology followed in August 2025. Further details of the agreed approach to the CEA can be found in Volume 1, Chapter 6: EIA Methodology.
- 5.5.1.10 In December 2025, the Applicant engaged with MD-LOT via consultation letter to highlight that the standard Section 36 five-year implementation period from consent award to commencement of development, may be challenging for Morven North and Morven South due to factors not entirely within the control of the Applicant, such as uncertainty on grid connection dates, and lead times for HVDC procurement. The Applicant sought early feedback and guidance from MD-LOT on an appropriate way forward with respect to the Morven North and Morven South consent applications and to ensure sufficient information was provided within the applications. In response, MD-LOT requested that further information and justification on the need for a longer validity period should be provided within the application for their consideration, which has been set out in Chapter 6: Planning Statement and Needs Case of the Additional Application Information submitted as part of the Morven South application. In addition, MD-LOT flagged that the Applicant should seek views from NatureScot on this matter, however, in response, NatureScot advised that the matter should continue to be handled through MD-LOT.
- 5.5.1.11 There were some topics which required more extensive post-Scoping consultation. Key discussions and feedback are summarised below:
- Shipping and navigation
 - the Applicant has engaged with the MCA, NLB, CoS and SFF throughout the pre-application phase to discuss issues and concerns with regard to shipping and navigation within Morven South.
 - As noted in Table 5.6, the Applicant has issued consultation letters to regular operators of commercial vessels which use identified routes in the vicinity of Morven South to obtain feedback on how they may be affected.
 - The Applicant also held a Hazard Workshop in September 2024 with shipping and navigation stakeholders to discuss key issues, concerns and hazards.
 - Follow up correspondence with the MCA, NLB, CoS and SFF was issued in December 2024 and a drop-in session with shipping and navigation stakeholders was held in January 2025, to explain the separation of the Morven Site and understand any concerns associated with this.
 - Commercial fisheries – regular meetings with commercial fisheries stakeholders were held to keep them updated on the progression of the Morven South pre-application phase (including the aforementioned separation of the Morven Site), discuss datasets and scoped in and scoped out impacts in Volume 2, Chapter 12: Commercial Fisheries and Volume 3, Chapter 12.1: Commercial Fisheries Shared Technical Report, and to verify the data used. Fisheries data from commercial fisheries stakeholders was sought and welcomed for inclusion in the Morven South EIA Report. In addition, the Applicant has involved commercial fisheries stakeholders in the development of the Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) submitted as part of the Morven South EIA Report (see Volume 4, Annex 3: Fisheries Mitigation Monitoring and Communication Plan (Version 1)).

5.5.1.12 The Applicant has committed to collaboration with other developers in the ScotWind leasing East and North-East regions, on shared issues where regional and strategic level engagement is required to identify evidence gaps and opportunities to address these, mitigation measures, and address potential cumulative impacts. The following topics have been the subject of developer-led collaboration:

- offshore ornithology via the North East and East Ornithology Group (NEEOG);
- shipping and navigation via the Shipping and Navigation ScotWind E6 Developer Group, for example in the production of the ScotWind E6 Developers Cumulative Baseline for Shipping and Navigation (see Volume 3, Annex 13.2: East Region Developers Group Cumulative Baseline for Shipping and Navigation);
- commercial fisheries via the ScotWind East Region Commercial Fisheries Working Group;
- aviation (military and civil) via the Offshore Wind Industry Council (OWIC), for example, on Programme Njord.

5.5.1.13 The Applicant will continue to engage with stakeholders and collaborate with developer groups, where appropriate, throughout the post-application and post-consent phases.

5.6 Other stakeholder engagement

5.6.1 Pre-application Consultation

5.6.1.1 Whilst Morven South is located in Scottish offshore waters (12nm to 200nm) and the PAC Regulations therefore do not apply, as noted in paragraph 5.2.1.4, they are considered good practice for undertaking public engagement. Therefore, the Applicant has considered the principles of these regulations when planning events for public engagement.

5.6.1.2 The Applicant held a Public Information Day in-person at Stonehaven Town Hall on 29 October 2025 to allow members of the public and stakeholders to meet the Applicant, ask questions and discuss the proposals. In addition, the Applicant also provided, in parallel, a virtual exhibition hall for members of the public and stakeholders that could not attend the in-person Public Information Day. The in-person Public Information Day and virtual exhibition hall provided information on Morven North and Morven South, as well as high-level information on MHPGC Project. The Applicant provided brochures in hard copy at the in-person Public Information Day and electronic copies via the Applicant's dedicated website (MvOWL, 2025) and virtual exhibition hall, which outlined the information in an appropriate, readable format for a non-technical audience. In addition, MvOWL held an online webinar on the evening of 12 November 2025 to provide information to members of the public and stakeholders on Morven South.

5.6.1.3 Attendees were given opportunity to provide feedback from the Public Information Day and virtual exhibition hall materials via hard copy or online, which was requested by 30 November 2025 to allow consideration in this Morven South EIA Report, where appropriate. The Applicant continues to accept feedback via the Applicant's dedicated email address, telephone and post. Further details, including analysis of feedback received from attendees of the Public Information Day and online webinar, have been provided within Volume 3, Annex 5.3: Community Engagement Statement.

5.6.2 Stakeholder Engagement Manager

5.6.2.1 Since January 2022, a dedicated, full-time Stakeholder Engagement Manager has been in post, supported by a specialist stakeholder engagement contractor, WSP. The Stakeholder Engagement Manager was instrumental in setting up the collaboration with the developers and the fishing industry. They also work with the project team to co-ordinate regular stakeholder engagement with political and industry stakeholders.

5.6.3 Fisheries Liaison Officer

5.6.3.1 The Applicant commissioned a Company Fisheries Liaison Officer (CFLO) to support engagement with the commercial fishing industry during the pre-application phase and beyond. Brown and May Marine (BMM) are currently providing these services to the Applicant with respect to Morven South. With a comprehensive network of contacts across fisheries stakeholders, the CFLO enables the Applicant to reach key local fisheries stakeholders across the region. The CFLO has supported engagement activities linked to the development of the Morven South EIA Report, supported on engagement with the fishing industry during survey activities and generally been the key contact for the Applicant for the interface with commercial fisheries stakeholders. This role will continue throughout the lifetime of the project to ensure continued positive relations between the Applicant and the fishing industry.

5.6.4 Information provision, project website and digital information

5.6.4.1 As noted above, stakeholders and members of the public have been provided the opportunity to seek further information and provide feedback on Morven South through a variety of means during the pre-application phase for Morven South. The Stakeholder Engagement Manager has attended in-person and virtual meetings and communicated with stakeholders via telephone, email or post, where requested.

5.6.4.2 The Applicant has a dedicated email address for queries and information provision during the pre-application phase:

- info@morvenoffshorewind.com

5.6.4.3 In addition, the Applicant has a dedicated website which hosts information on Morven South, including news and updates on the progress of the applications and upcoming consultation events. The Applicant also accepts queries and requests for information provision via telephone and post (via a freepost postal address), the details of which can be found in the 'Contact' page of their website (MvOWL, 2026). In addition, there was a feedback form provided physically and electronically throughout the consultation period.

5.6.5 Community participation

5.6.5.1 The Applicant's Supply Chain Development Statement (SCDS) Outlook, published in 2023 (MvOWL, 2023), provided details of the financial investment that the Applicant was committed to delivering to the Scottish and UK supply chains, alongside an ambition scenario to increase investment should opportunities be feasible. In addition, the Applicant's SCDS outlined a number of enhanced supply chain commitments (i.e. those beyond the supply of goods and services needed to develop, construct, and operate Morven South) which would support Scottish Government goals for the offshore wind sector, enabling a just transition, and reaching net zero. An update to the Applicant's SCDS is anticipated in 2026.

5.6.5.2 Based on the information provided in the Applicant's SCDS, a summary of the initiatives the Applicant have already progressed or been involved in, or intend to develop in the future if their consent applications are successful, is provided on their website (Morven Offshore Wind, 2026).

5.7 Feedback and reporting

5.7.1.1 The Applicant has recorded and collated all feedback received throughout the pre-application phase, including that provided verbally (e.g. via virtual meeting or telephone). Volume 3, Annex 5.1: Consultation details all feedback received as relevant and pertaining to Morven South. All feedback has been reviewed and considered, and has been used, where appropriate, to inform key decisions on, and the assessments outlined in, this Morven South EIA Report. Each topic chapter outlines feedback received relating to that technical topic and how this has been addressed (Volume 2, Chapters 7 to 21).

5.8 References

Aarhus Centres (2025). Aarhus Convention Pillars. Available at: <https://aarhus.osce.org/> (Accessed: December 2025).

HM Government (2007). The Marine Works (Environmental Impact Assessment) Regulations 2007. Available at: <https://www.legislation.gov.uk/ukxi/2007/1518/contents> (Accessed: December 2025).

HM Government (2013). The Marine Licensing (Pre-application Consultation) (Scotland) Regulations 2013. Available at: <https://www.legislation.gov.uk/ssi/2013/286/made> (Accessed: December 2025).

HM Government (2017). The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 Available at: <https://www.legislation.gov.uk/ssi/2017/101/contents> (Accessed: December 2025).

Hodgson, J. (1985). R v London Borough of Brent ex parte Gunning (1985) 84 LGR 168. Available at: <https://unece.org/environment/documents/2021/03/working-documents/annex-1f-r-v-brent-london-borough-council-ex-p> (Accessed: December 2025).

MD-LOT (2023). Scoping Report – Morven Offshore Wind Farm Array Area – July 2023. Available at: <https://marine.gov.scot/?q=node/24230> (Accessed: December 2025).

MD-LOT (2025). Marine licensing and consenting: offshore renewable energy projects. Available at: <https://www.gov.scot/publications/marine-licensing-and-consenting-offshore-renewable-energy-projects/pages/overview/> (Accessed: December 2025).

MvOWL (2023). Morven Supply Chain Development Statement – Outlook. Available at: <https://www.crownstatescotland.com/sites/default/files/2023-07/morven-scds-outlook-july-2023-update.pdf> (Accessed: January 2026).

MvOWL (2025). Morven Offshore Wind Farm: Infrastructure in Scottish waters – public Information Day Brochure. Available at: <https://www.morvenoffshorewind.com/wp-content/uploads/2025/10/Infrastructure-in-Scottish-waters-public-information-day-brochure-2.pdf> (Accessed: January 2026).

MvOWL (2026). Morven Offshore Wind Farm Array Project. Available at: <https://www.morvenoffshorewind.com/morven-offshore-wind-farm/> (Accessed: January 2026).

UNECE (2025). Aarhus Convention: Content of the Convention. Available at: <https://unece.org/environment-policy/public-participation/aarhus-convention/content> (Accessed: December 2025)