

**Representations  
Further Additional Information**

# **Aberdeenshire Council**

Our Ref: ENQ/2026/0082  
Your Ref: 00011025 / 00011026

Ask for: [Redacted]  
Tel: 01467 468012  
Email: [Redacted]

Scottish Government Marine Directorate  
Scottish Government  
Marine Laboratory  
Aberdeen  
AB11 9DB

16 February 2026

Dear Sir/Madam

**Marine Licence Consultation for Additional Information in Relation to ENQ/2024/1800 - Consultation under Section 36 of the Electricity Act 1989, the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009 for the Erection of Offshore Wind Farm and Associated Infrastructure at Muir Mhòr Offshore Wind Farm, Peterhead**

Thank you for the above consultation.

After review of the submitted material, and consultation with our colleagues in Natural Heritage, the Planning Service confirm that as the information does not relate to any Special Protection Areas (SPA's) within Aberdeenshire, the service have no comment to make.

Yours faithfully  
[Redacted]

[Redacted]

Head of Planning and Economy

**BT**

**From:** [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)  
**To:** [MD Marine Renewables](mailto:MD_Marine_Renewables)  
**Cc:** [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)  
**Subject:** [Redacted] WID13704 - Muir Mhór Offshore Wind Farm Limited – EIA, Section 36 consent and Marine Licence Applications - Consultation – Response Required by 4 February 2025  
**Date:** 30 January 2025 13:40:35  
**Attachments:** [image004.png](#)  
[image006.png](#)  
[image007.png](#)

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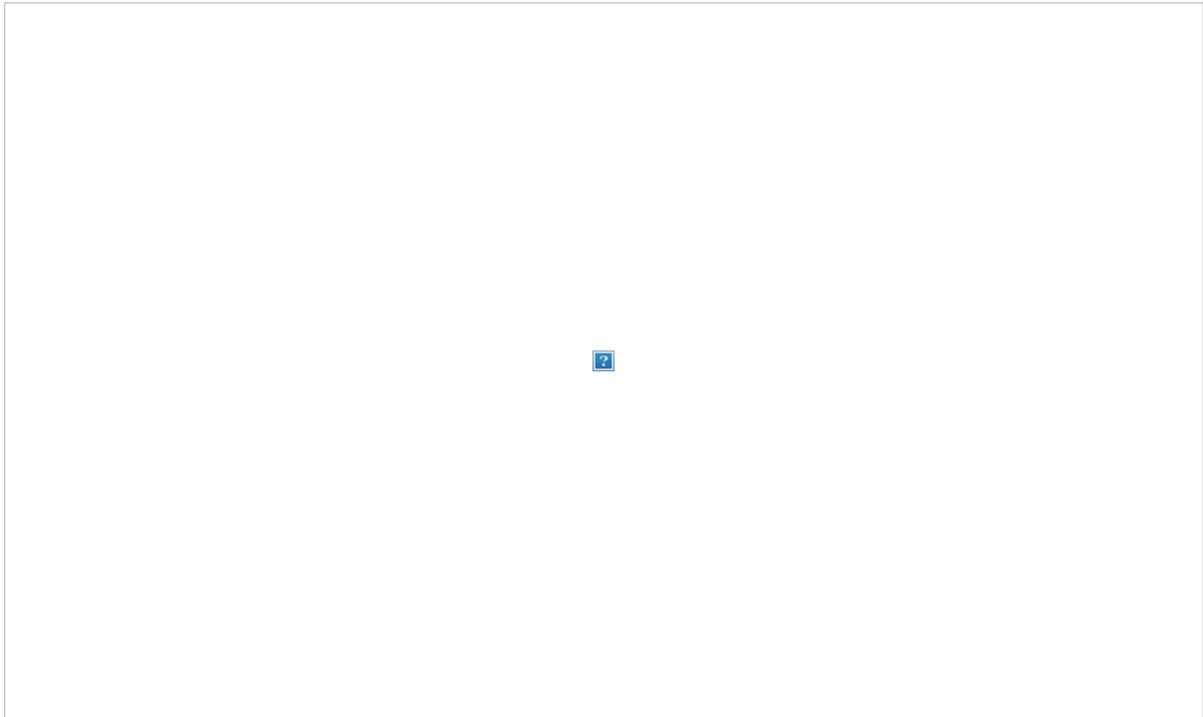
**OUR REF; WID13704**

Thank you for your email dated 06/12/2024.

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

The conclusion is that the proposed location of the Muir Mhór Offshore Wind Farm should not cause interference to BT's current and presently planned radio network.

The scoping report states that the Developer plans to submit a separate application for the onshore element which we will access separately once submitted and received by BT.



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](mailto:radionetworkprotection@bt.com)

Kind regards

**[Redacted]**  
National Radio Planner  
Network Planning

E: [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)



**DAERA**

## **Muir Mhor Offshore Wind Farm Limited – Muir Mhor Offshore Wind Farm – Marine and Fisheries Division Response**

### **Marine Conservation Response**

DAERA welcome the opportunity to comment on this request for further information. We are unclear why Fulmar and Manx shearwater species are not included in these assessments. Both species have long foraging ranges and are not only priority species in Scottish waters but are also key features on Rathlin and Copeland Islands SPA's, as is identified in the additional information report submitted in October 2025 (found [here](#) pg. 8) which states '*The information, qualitative assessment and proposed mitigation measures provided in the RIAA for these two impact pathways – relevant to all SPA seabird qualifiers – apply equally to fulmar from Rathlin Island SPA*'.

Is it a case where they may not meet the criteria for inclusion given the project location and pressure pathways? We would welcome clarification on this.

### **Marine Licensing Response**

**Activities taking place below the mean high water springs mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.**

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the Mean High Water Spring Tide (MHWST). It is the applicant's responsibility to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

If any parts of this proposal are on, in or over the licensable area, contact must be made with the Marine Licensing Team, DAERA Marine and Fisheries Division, Clare House, 303 Airport Road West, Sydenham Intake, Belfast, BT3 9ED, Tel: 028 90569247, Email: [MarineLicensingTeam@daera-ni.gov.uk](mailto:MarineLicensingTeam@daera-ni.gov.uk). Further guidance on the

application process and associated forms are available on the DAERA website at [Marine Licensing | Department of Agriculture, Environment and Rural Affairs](#)

# **Dee District Salmon Fishery Board**



# Dee District Salmon Fishery Board

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

By email to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

24<sup>th</sup> Feb 2026

Dear MD Team,

REQUEST FOR REPRESENTATIONS - Muir Mhor Offshore Wind Farm – Further Additional Information Consultation

**ELECTRICITY ACT 1989**

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

*The Electricity (Applications for Consent) Regulations 1990*

**MARINE (SCOTLAND) ACT 2010**

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

**MARINE AND COASTAL ACCESS ACT 2009**

*The Marine Works (Environmental Impact Assessment) Regulations 2007*

On behalf of the Dee District Salmon Fishery Board (Dee DSFB) we welcome the opportunity to respond to the *Muir Mhór Offshore Wind Farm - Consultation on Further Additional Information*.

**Position**

The additional information provided focuses on information for ornithological assessments and as such does not alter our previous response to the Scoping Opinion for this development submitted on the 11<sup>th</sup> of August 2023.

Yours sincerely

[Redacted]

River Operations Manager, Dee District Salmon Fishery Board

# **Glasgow Airport**

**From:** [#GLA Safeguarding](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** RE: Muir Mhor Offshore Wind Farm Limited – Muir Mhor Offshore Wind Farm – Further Additional Information Consultation – Response Required by 25 February 2026  
**Date:** 22 January 2026 10:37:55  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image212388.png](#)  
[image207912.png](#)  
[image291111.png](#)  
[image474971.png](#)  
[image335069.png](#)

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This proposal is located outwith the consultation area for Glasgow Airport. As such we have no comment to make and need not be consulted further.

Kind regards  
[Redacted]



**#GLA Safeguarding**  
**#GLA Safeguarding**

[Redacted]  
 [glasafeguard@glasgowairport.com](mailto:glasafeguard@glasgowairport.com)  
 [www.glasgowairport.com](http://www.glasgowairport.com)

Glasgow Airport, Erskine Court, St Andrews Drive, Paisley, PA3 2TJ

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# **Historic Environment Scotland**



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

By email to:  
[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

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

[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)  
0131-668-8716

Our case ID: 300064023

29 January 2026

Dear Marine Directorate

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017  
The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2007 & 2017  
Muir Mhor Offshore Wind Farm – Further Additional information

Thank you for consulting us on the further Additional Information submitted in relation to the above EIA application. We understand that the consultation regards further information relating to the ornithological assessments. We received the consultation on 15 January 2026.

We have reviewed the further Additional Information report and considered the proposed development in terms of our historic environment interests. This covers cultural World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

The relevant archaeological and cultural heritage advisors will also be able to offer advice on impacts on the historic environment. This may include topics covered by [our advice-giving role](#), and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas. In this instance you should contact the Aberdeenshire Council Archaeology Service ([archaeology@aberdeenshire.gov.uk](mailto:archaeology@aberdeenshire.gov.uk)).

As of 1 January 2025, we no longer provide advice on undesignated underwater cultural heritage. This includes the preparation of documents for post-consent activities including Written Schemes of Investigation or Protocols for Archaeological Discoveries. For EIA projects, the relevant competent authority must ensure that they have access to sufficient expertise to examine the EIA Report in accordance with the relevant regulations.

### Our advice

We responded to the EIA application in February 2025 and the Additional Information in October 2025 and we did not object to the proposals. We have considered the further additional information received and we do not have any comments to make on the

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**

proposals. Our decision not to provide comments should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

### Further information

Please contact us if you have any questions about this letter. The officer managing this case is [Redacted] who can be contacted by phone on 0131 668 8730 or by email at [Redacted]

Yours sincerely

Historic Environment Scotland

**Kincardine Offshore Wind Farm  
(KOWL)**

**From:** [Redacted]  
**To:** [MD Marine Renewables](#)  
**Cc:** [Redacted]  
**Subject:** Muir Mhor Offshore Wind Farm – Further Additional Information Consultation – Response Required by 25 February 2026  
**Date:** 17 February 2026 10:22:17  
**Attachments:** [image001.png](#)

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Dear Sirs

KOWL has reviewed the Muir Mhor Offshore Windfarm Further Additional Information regarding collision risk modelling and population viability analysis and has the following observations and comments.

KOWL is pleased to see that the Kincardine Offshore Windfarm has been considered in the cumulative impact analysis for some of the species, although it would have been preferable to have seen Kincardine included in the non-breeding cumulative effects modelling for Gannet and Razorbill, as both of these species occur in the non-breeding season at Kincardine. We also note that the excel spreadsheet for Puffin in the non-breeding table is incorrectly labelled as RA (Razorbill) in the species column although this is a minor error.

However, KOWL is surprised to see that the Gannet colony at Troup Head appears to have been excluded from the cumulative effects analysis (whilst Guillemots and Kittiwakes at Troup Head have been included). This is one of the closest Gannet colonies (if not the closest?) to the Muir Mhor site, with an estimate of 5600 AON/AOS in 2021 according to the Seabirds Count census. It would be interesting to know why the effect of the proposed Muir Mhor and neighbouring developments on this growing colony appears to have been overlooked.

KOWL has a continued concern over the use of overly precautionous avoidance rates in CRM tools, as well as the compounding of multiple uncertainties in the cumulative effects framework. KOWL recommends that avoidance rates are reviewed at least annually, in light of the latest information from long-term collision monitoring studies at operational offshore windfarms.

Notwithstanding the comments above, the work presented is robust and thorough and KOWL are grateful for the opportunity to provide comments.

Kind Regards

[Redacted]

[Redacted]

**QHSE Manager**  
**Kincardine Offshore Wind Ltd**  
**Union Point**

**Aberdeen**

**Tel :** [Redacted]



**Maritime & Coastguard  
Agency**

**From:** [navigation safety](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Redacted] [Redacted]  
**Subject:** RE: Muir Mhor Offshore Wind Farm Limited – Muir Mhor Offshore Wind Farm – Further Additional Information Consultation – Response Required by 25 February 2026  
**Date:** 04 February 2026 15:10:37  
**Attachments:** [image003.png](#)  
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[image006.png](#)  
[image007.png](#)  
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[image009.png](#)  
[image001.png](#)

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Good afternoon, Marine Directorate.

Thank you for your correspondence regarding the updated information for the Muir Mhor Offshore Wind Farm.

We note that the additional information submitted by the developer is in regard to ornithological assessment, Collision Risk Model mortality and in-combination Population Viability Analysis. As this is not in regard to shipping and navigation, we will not be providing a response on this occasion. Please take this as a 'nil response' from us.

Kind regards,

[Redacted]

Offshore Renewables Project Lead  
**UK Technical Services Navigation**

[Redacted]

[Redacted]



Maritime &  
Coastguard  
Agency

**Maritime & Coastguard Agency**

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



**Safer Lives, Safer Ships, Cleaner Seas**

[www.gov.uk/mca](http://www.gov.uk/mca)

# **Marine Analytical Unit**

**From:** [Redacted]  
**To:** [MD Marine Renewables](#)  
**Cc:** [Redacted]  
**Subject:** RE: Muir Mhor Offshore Wind Farm Limited – Muir Mhor Offshore Wind Farm – Further Additional Information Consultation – Response Required by 25 February 2026  
**Date:** 21 January 2026 13:09:08  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Dear Sir/Madam,

No additional information or amendments have been provided to the socio-economic section of the application. As such, this is to confirm that the Marine Analytical Unit are providing a nil response.

Best regards,

[Redacted]  
ed]

**Ministry of Defence**



# Defence Infrastructure Organisation

[Redacted]

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

Application Ref: 00011025 - 00011026

Our Reference: DIO10059508

E-mail: [DIO-Safeguarding-Wind@mod.gov.uk](mailto:DIO-Safeguarding-Wind@mod.gov.uk)

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

28 January 2026

Dear Sir / Madam

**ELECTRICITY ACT 1989**

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

**MARINE (SCOTLAND) ACT 2010**

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

**MARINE AND COASTAL ACCESS ACT 2009**

*The Marine Works (Environmental Impact Assessment) Regulations 2007*

Thank you for your communication dated 15 January 2026 within which the Scottish Government have consulted the Ministry of Defence (MOD) on Additional Information submitted by the developer.

The MOD have reviewed the information provided and published on the Muir Mhor Offshore Wind Farm Project Page of the marine.gov.scot website. We note that as there are no changes with regard to the proposed Muir Mhor Wind Farm project, the MOD's position previously communicated by letter dated 4 February 2025, and re-affirmed 10 November 2025, remains extant.

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

Yours faithfully

[Redacted]

[Redacted]

Assistant Safeguarding Manager

**NatureScot**

Marine Directorate  
Scottish Government  
Marine Laboratory  
Aberdeen  
AB11 9DB

25 February 2026

Our ref: CNS – REN – OWSF – E2 –  
Application

Dear Sir/Madam,

**MUIR MHÒR OFFSHORE WIND FARM**

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

Thank you for consulting us on the second Additional Information submitted for the proposed Muir Mhòr Offshore Wind Farm. This follows on from the original Application consultation on 05 December 2024, and the first Additional Information consultation on 08 October 2025. The proposal, located approximately 63km east of Peterhead, includes a project design envelope approach comprising up to 67 floating wind turbines, the associated infrastructure, with an installation capacity of 1 GW and a proposed 35-year lease.

The second Additional Information includes information relating to the updated mean estimates for Collision Risk Modelling (CRM), as well as the in-combination Population Viability Analysis (PVA) work undertaken by Muir Mhòr, Ossian and Caledonia to take account of the respective revised ornithology assessments.

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

## NatureScot advice

### In-combination PVA for Muir Mhòr, Ossian and Caledonia

Overall, we are content with the approach taken for the in-combination assessment. However, there are various points relating to the Cumulative Effects Framework (CEF) PVA selection tool spreadsheet and supporting report, which we raise in Appendix A to this response, to assist future Applicants in the interpretation of the spreadsheet and use in future assessments.

Our detailed conclusions on the PVA outputs are presented in Appendix A to this response.

For the qualifying species and sites listed below, we have concluded AEOsI in-combination for Muir Mhòr with Ossian and/or Caledonia wind farm projects:

- Kittiwake at Fair Isle SPA
- Puffin at Forth Islands SPA
- Puffin at Hoy SPA
- Puffin at North Caithness Cliffs SPA
- Kittiwake at Rousay SPA

Based on our assessment and conclusions reached above, we advise Marine Directorate will be required to undertake an Appropriate Assessment.

In Appendix A, we also provide an updated summary table of in-combination conclusions of AEOsI and comparison with previous advice.

### Updated mean estimates for CRM

This updated report on the use of mean collision mortality estimates does not provide the monthly or seasonal mean collision estimates and only presents annual mean collision mortality estimates for four species. The exception is gannet, for which seasonal mean collision mortality estimates, and apportioned annual mean collision mortality estimates are provided.

We highlight that in our advice via email on 16 December 2025, we advised that “annual mean collision estimates have been provided for use in the Appropriate Assessment. However, monthly and seasonal mean collision mortality estimates are still required for all eight species assessed in the original collision risk modelling technical report”. This information has not been provided in this report. **We reiterate the importance of providing monthly, seasonal and apportioned mean collision mortality estimates for all species assessed in the original collision risk modelling report, to provide the necessary values for future in-combination assessments to be undertaken.**

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

Yours sincerely,

[Redacted]

Head of Marine Energy – Sustainable Coasts and Seas.

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## NATURESCOT ADVICE ON MUIR MHÒR OFFSHORE WIND FARM

### Appendix A – Marine and intertidal ornithology

In our advice dated 18 November 2025, we highlighted an issue with the in-combination assessment, stemming from Muir Mhòr, Caledonia and Ossian submitting Additional Information at a similar time to each other. Assessments within the respective Additional Information submissions were based on the latest publicly available information, however, this information was out of date given all three projects had submitted revised ornithology assessments within their Additional Information. As such, individual project numbers used within the in-combination assessments may differ and we requested additional/updated PVAs for certain sites and species.

This consultation has provided an updated in-combination assessment for Muir Mhòr, Caledonia and Ossian, using the updated assessment figures for the three respective projects and the existing mortalities collated by the North East and East Ornithology Group (NEEOG) Cumulative Effects Framework (CEF) work. We note an issue in the CEF PVA selection tool spreadsheet relating to the inclusion of compensated projects for the in-combination assessment, which we discuss further in A.1.2.2 below.

As indicated in our response to the first Additional Information Report dated 18 November 2025, Muir Mhòr only presented an in-combination scenario which included full, uncompensated impacts from Berwick Bank (and Green Volt), as this was the agreed position at the time. However, other projects involved in this in-combination Additional Information consultation (i.e. Caledonia and Ossian), independently opted to remove Berwick Bank (and Green Volt) compensated impacts from their individual assessments. This joint in-combination work has removed any projects that have compensated impacts (including Berwick Bank) through the CEF PVA selection tool spreadsheet. We highlight this difference in approach to Scottish Ministers for consideration.

#### A.1 Approach to in-combination assessment

We note that each of the three projects (Muir Mhòr, Ossian and Caledonia) undertook their in-combination PVAs on the basis that if the individual project alone mortalities were less than 0.2 birds/annum then a PVA was not required. This was based on the advised threshold for tangible impacts from the project and the requirement for PVA at the time of the Applicants' assessment.

We no longer recommend the use of this threshold because of the increasing number of features and sites where AEOI was being concluded in-combination and the possibility that even small additional mortalities could have a detrimental effect, particularly on already declining or small populations. Currently, we advise consulting NatureScot if mortalities are less than 0.2 birds/annum and the increase in adult mortality equals or exceeds 0.02 percentage points.

Given the change in advice, we highlight where the 0.2 birds/annum threshold would not have been reached, for consideration by MD-LOT:

- Kittiwake at Copinsay SPA for Ossian and Caledonia
- Kittiwake at Fair Isle SPA for Muir Mhòr and Ossian
- Kittiwake at Marwick Head SPA for Muir Mhòr and Ossian
- Kittiwake at Rousay SPA for Muir Mhòr, Ossian and Caledonia
- Puffin at Hoy SPA for Muir Mhòr.

The in-combination counterfactuals for all the above features, except kittiwake at Marwick Head, are significantly low and all these populations are in serious decline. Therefore, we considered it important that PVAs were undertaken for these features, despite the low project alone mortalities.

These PVAs have been presented within this consultation, so no further information from the Applicants is required in this instance.

#### *A.1.1 Approach to screening SPA qualifying features*

We have reviewed the accompanying Additional Information for MD-LOT report (issue D, dated 12 December 2025), and note that the narrative description of the process does not fully align with the steps in the In-combination PVA selection tool spreadsheet. Additionally, the numbered bullet points in Section 2.1 of the report do not fully align with the fuller description of the steps in the report either. We recommend the wording is revised if relied upon for future assessments. Please also note the following additional aspects as set out below that should also be addressed.

We have identified an error in the wording of Step 4 of the PVA screening approach in Section 2.1 of the report, whereby it states, “**Include** only SPA qualifying features where an Adverse Effect on Site Integrity has been concluded, and compensation is proposed, by at least one of the Muir Mhòr, Ossian and Caledonia projects.” We highlight that ‘include’ should actually be ‘exclude’. This reflects the approach originally taken in the PVA screening tool.

However, we previously raised an issue with this approach – which would prevent the impacts of two uncompensated projects from being screened into the PVA assessment if they exceed the relevant threshold. This is likely only a possibility in a scenario where one project reached AEoSI in the project-alone assessment and has committed to compensating for its impacts, and both of the other two projects have connectivity and predicted impacts on that same feature. Therefore, with the compensated project impacts zeroed, there is still the potential for the other projects to cause AEoSI in-combination.

Similarly, it appears there may be an error in the wording of the following paragraph: “Finally, it is not possible to conclude **no** Adverse Effect on Site Integrity in-combination if one (or more) of the Muir Mhòr, Ossian or Caledonia projects alone have already concluded an Adverse Effect on Site Integrity (and are proposing compensation for that SPA qualifying feature) within their respective project Reports to Inform Appropriate Assessments (RIAs). Consequently, fifteen SPA qualifying features were removed due to an existing Adverse Effect on Site Integrity (and proposed compensation) from one, or more, of Muir Mhòr, Ossian or Caledonia”. Our understanding is that this should read “Finally, it is not possible to **conclude Adverse Effect on Site Integrity** in-combination” to be consistent with the earlier statements.

Muir Mhòr were advised in a meeting in December 2025 that a PVA for guillemot at Buchan Ness to Collieston Coast SPA may have been missed based on this approach as the Muir Mhòr RIAA and AEI concluded no AEoSI for this feature. As a result of our advice on the AEI submission, Muir Mhòr have now concluded AEoSI from their project on guillemot at Buchan Ness to Collieston Coast SPA. Along with the existing AEoSI conclusion for Ossian, this means two of the three projects in question will now compensate their impacts to this feature, thus in our view, an in-combination PVA is not required for the project-alone impacts of Caledonia, noting that this is based on NatureScot conclusions, as the Appropriate Assessment has not yet been completed.

We believe that the approach taken in the in-combination PVA assessment has not excluded any in-combination PVAs because of these differences as there are no scenarios that would allow this to occur. We do however wish to flag the issues with the wording of this approach, in the case that any future Applicants may refer to this report to inform their own assessments.

#### *A.1.2 CEF PVA selection tool spreadsheet*

Whilst we accept the Cumulative Effects Framework (CEF) PVA selection tool spreadsheet submitted as part of this Additional Information, we highlight various points to assist future Applicants in the interpretation of the spreadsheet and use in future assessments.

##### *A.1.2.1 Razorbill non-breeding*

In the 'RA Non-Breeding' sheet of the CEF PVA selection tool spreadsheet, Fowlsheugh SPA winter passage is entered twice. Instead, one set of winter impacts should be for Troup, Pennan and Lion's Heads SPA and this applies to all projects listed.

As a result, there is also an error in the 'Summary' sheet of the CEF PVA selection tool spreadsheet. The corrected impact values in column C should be 90.56664719 for Fowlsheugh SPA and 18.34788324 for Troup, Pennan and Lion's Heads SPA.

However, as neither SPA was taken through to the PVA stage, there are no implications for our advice for Muir Mhòr, although future Applicants should be made aware of this when using the CEF PVA selection tool spreadsheet.

##### *A.1.2.2 Kittiwake non-breeding*

In the 'KI Non-Breeding' sheet of the CEF PVA selection tool spreadsheet, for East Caithness Cliffs SPA in both autumn and spring migration seasons, and for both collision and displacement impacts, the value for column M 'Project consented and committed to all compensation' was set to 'Y' for almost all projects, so all impacts were set to zero. The only Scottish projects which should have been set to 'Y' (i.e. consented projects with requirement for compensation) and have impacts zeroed are:

- Berwick Bank
- Green Volt
- Salamander
- West of Orkney

Please note, we have not reviewed the non-Scottish projects in this column, however, it is likely that most of the projects listed have also been incorrectly set to 'Y' and zeroed.

This affects the non-breeding season total impact for East Caithness Cliffs SPA and the annual total impact. However, East Caithness Cliffs SPA was not taken through to the PVA stage, so there are no implications for our advice for Muir Mhòr. Changing column M to 'N' for the affected projects would resolve this issue and future Applicants should be made aware of this when using the CEF PVA selection tool spreadsheet.

## A.2 Summary of Additional Information in-combination conclusions

Our assessments of AEoSI are primarily based on the PVA Counterfactual of Population Size (CPS) outputs, after 35 years (2067). However, in reaching our conclusions we also consider a range of other factors including:

- counterfactual of Population Growth Rate (CGR) outputs and the % decrease in population growth rate
- status of the population including short and long-term trends, at SPA, national and UK levels
- condition of the feature
- species ecology
- proportional importance of species in Scotland and UK
- impacts of HPAI and other recent mortality events.

PVAs were undertaken for the following impact pathways:

- collision
- distributional responses
- collision and displacement combined for gannet and kittiwake.

*Table A-1. Summary of in-combination assessment for Muir Mhòr, Ossian and Caledonia where PVA has been undertaken for this Additional Information. Conclusions of AEoSI are bolded. \*no project alone mortality for Ossian. \*\*\*no project alone mortality for Caledonia.*

Special Protection Area (SPA)	Qualifying species	CPS (35 years)	CGR (35 years)	Determination of AEoSI
Cape Wrath	Kittiwake*	0.978-0.970	0.999-0.999	No AEoSI
Fair Isle	Gannet	0.970-0.942	0.999-0.998	No AEoSI
	Kittiwake***	0.869-0.812	0.996-0.994	<b>AEoSI</b>
	Puffin*	0.985-0.963	1.00-0.999	No AEoSI
Forth Islands	Puffin	0.913-0.834	0.997-0.995	<b>AEoSI</b>
Hermaness, Saxa Ford & Valla Field	Gannet	0.964-0.923	0.999-0.998	No AEoSI
Hoy	Puffin*	0.928-0.812	0.998-0.994	<b>AEoSI</b>
Marwick Head	Kittiwake	0.941-0.916	0.998-0.998	No AEoSI
North Caithness Cliffs	Puffin*	0.773-0.655	0.993-0.988	<b>AEoSI</b>
North Rona & Sula Sgeir	Gannet	0.992-0.985	1.00-1.00	No AEoSI
Noss	Gannet	0.967-0.934	0.999-0.998	No AEoSI
Rousay	Kittiwake	0.652-0.531	0.988-0.983	<b>AEoSI</b>

Sule Skerry & Sule Stack	Gannet	0.918-0.910	0.998-0.997	No AEoSI
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### A.3 Individual SPA assessments from Additional Information

#### A.3.1 Cape Wrath SPA

Table A-2. PVA results for Cape Wrath SPA. \*no project alone mortality for Ossian.

Species	CPS	CGR	Determination of AEoSI
Kittiwake*	0.978-0.970	0.999-0.999	No AEoSI

We conclude No AEoSI for kittiwake at Cape Wrath SPA, considering:

- the high CPS value, representing only a small population decline of up to 3%
- the high CGR value, representing a decrease in population growth rate of only 0.1%.

We note the population decline of 65% between Seabird 2000 and Seabirds Count and the unfavourable condition of the feature. However, we consider this is outweighed by the high counterfactual values, along with the minimal contribution of the project to the in-combination mortality.

#### A.3.2 Fair Isle SPA

Table A-3. PVA results for Fair Isle SPA. \*no project alone mortality for Caledonia. \*\*no project alone mortality for Ossian.

Species	CPS	CGR	Determination of AEoSI
Gannet	0.970-0.942	0.999-0.998	No AEoSI
Kittiwake*	0.869-0.812	0.996-0.994	AEoSI
Puffin**	0.985-0.963	1.00-0.999	No AEoSI

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

- the high CPS values, representing only a small population decline of up to 5.8%
- the high CGR value, representing a decrease in population growth rate of only 0.2%
- the increasing population between Seabird 2000 and Seabirds Count and only a 3% decline following HPAI.

For kittiwake at Fair Isle SPA we conclude AEoSI, considering:

- the significantly low CPS value representing a population decrease of up to 18.8%
- a decrease in population growth rate of up to 0.6%
- 95% population decline between Seabird 2000 and Seabirds Count
- the unfavourable condition of the feature.

For puffin at Fair Isle SPA we conclude No AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 3.7%
- the high CGR value, representing a decrease in population growth rate of only 0.1%

We note that the population decline of 56% between Seabird 2000 and Seabirds Count and the unfavourable condition of the feature but, given the high counterfactual values, we do not consider the project would make a significant contribution to further decline.

### A.3.3 Forth Islands SPA

Table A-4. PVA results for Forth Islands SPA.

Species	CPS	CGR	Determination of AEoSI
Puffin	0.913-0.834	0.997-0.995	AEoSI

For puffin at Forth Islands SPA we conclude AEoSI, considering:

- the significantly low CPS value for the high displacement scenario, representing a population decrease of 16.6%
- a decrease in population growth rate of up to 0.5%
- 39% population decline between Seabird 2000 and Seabirds Count, despite the favourable condition of the feature.

### A.3.4 Hermaness, Saxa Vord & Valla Field SPA

Table A-5. PVA results for Hermaness, Saxa Vord & Valla Field SPA.

Species	CPS	CGR	Determination of AEoSI
Gannet	0.964-0.923	0.999-0.998	No AEoSI

For gannet at Hermaness, Saxa Vord & Valla Field SPA we conclude No AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 7.7%
- the high CGR value, representing a decrease in population growth rate of only 0.2%
- the increasing population between Seabird 2000 and Seabirds Count of 89%, though we note a 37% decline following HPAI (Tremlett et al 2024).

### A.3.5 Hoy SPA

Table A-6. PVA results for Hoy SPA. \*no project alone mortality for Ossian.

Species	CPS	CGR	Determination of AEoSI
Puffin*	0.928-0.812	0.998-0.994	AEoSI

For puffin at Hoy SPA we conclude AEoSI, considering:

- the significantly low CPS value for the high displacement scenario, representing a population decrease of 18.8%
- a decrease in population growth rate of up to 0.6%
- 32% population decline between Seabird 2000 and Seabirds Count
- the unfavourable condition of the feature.

### A.3.6 Marwick Head SPA

Table A-7. PVA results for Marwick Head SPA.

Species	CPS	CGR	Determination of AEOsI
Kittiwake	0.941-0.916	0.998-0.998	No AEOsI

For kittiwake at Marwick Head SPA we conclude No AEOsI, considering:

- the high CPS values, representing only a small population decline of up to 8.4%
- the high CGR value, representing a decrease in population growth rate of only 0.2%.

We note that the population decline of 84% between Seabird 2000 and Seabirds Count and the unfavourable condition of the feature, but a population increase of 59% was recorded in 2023 (Tremlett et al 2024). However, the counterfactual values do not raise issues in this context, and the project contribution to the in-combination totals is minimal.

### A.3.7 North Caithness Cliffs SPA

Table A-8. PVA results for North Caithness Cliffs SPA. \*no project alone mortality for Ossian.

Species	CPS	CGR	Determination of AEOsI
Puffin*	0.773-0.655	0.993-0.988	AEOsI

For puffin at North Caithness Cliffs SPA we conclude AEOsI, considering:

- the very low CPS values representing a population decline of up to 34.5%
- a decrease in population growth rate of up to 1.1%
- a 56% decline in the population between Seabird 2000 and Seabirds Count.
- the unfavourable condition of the feature.

### A.3.8 North Rona & Sula Sgeir SPA

Table A-9. PVA results for North Rona & Sula Sgeir SPA.

Species	CPS	CGR	Determination of AEOsI
Gannet	0.992-0.985	1.00-1.00	No AEOsI

For gannet at North Rona & Sula Sgeir SPA we conclude No AEOsI, considering:

- the high CPS values, representing only a small population decline of up to 1.5%
- the high CGR value, with no decrease in population growth rate
- the increasing population between Seabird 2000 and Seabirds Count of 33%, though we note a 23% decline following HPAI
- the favourable condition of the feature.

### A.3.9 Noss SPA

Table A-10. PVA results at Noss SPA.

Species	CPS	CGR	Determination of AEOsI
Gannet	0.967-0.934	0.999-0.998	No AEOsI

For gannet at Noss SPA we conclude No AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 6.6%
- the high CGR value, representing a decrease in population growth rate of only 0.2%
- the increasing population between Seabird 2000 and Seabirds Count of 59%, though we note a 10% decline following HPAI (Tremlet et al 2024).

#### A.3.10 Rousay SPA

Table A-11. PVA results for Rousay SPA.

Species	CPS	CGR	Determination of AEoSI
Kittiwake	0.652-0.531	0.988-0.983	AEoSI

For kittiwake at Rousay SPA we conclude AEoSI, considering:

- the very low CPS value representing a population decrease of up to 47%
- a decrease in population growth rate of up to 1.7%
- 88% population decline between Seabird 2000 and Seabirds Count
- the unfavourable condition of the feature.

#### A.3.11 Sule Skerry to Sule Stack SPA

Table A-12. PVA results for Sule Skerry to Sule Stack SPA.

Species	CPS	CGR	Determination of AEoSI
Gannet	0.918-0.910	0.998-0.997	No AEoSI

For gannet at Sule Skerry to Sule Stack SPA we conclude No AEoSI, considering:

- the high CPS values, representing only a small population decline of up to 9%
- the high CGR value, representing a decrease in population growth rate of up to 0.3%
- the stable population between Seabird 2000 and Seabirds Count
- the favourable condition of the feature.

### A.4 Summary of in-combination conclusions from all NatureScot responses

Table A-13 includes a summary of final NatureScot advice on the in-combination conclusions of AEoSI across all consultations for Muir Mhòr, including the original application, first Additional Information submission and second Additional Information submission. This should supersede previous NatureScot advice.

As indicated above, for the conclusions below that are based on the original application or the first Additional Information submission, Muir Mhòr only presented an in-combination scenario which includes full, uncompensated impacts from Berwick Bank (and Green Volt), as agreed based on the position at the time. This differs to the approach taken by Caledonia and Ossian, as well as the approach presented through this in-combination consultation. We highlight this difference in approach to Scottish Ministers for consideration.

Table A-13. Summary of final in-combination conclusions of AEoSI and comparison with previous advice: original Environmental Impact Assessment Report (EIAR) from 05 December 2024, first Additional Information Report (AIR) from 08 October 2025, second Additional Information Report (AIR) from this consultation. Conclusions of AEoSI are bolded. \*no project alone mortality for Ossian. \*\*\*no project alone mortality for Caledonia.

Special Protection Area (SPA)	Qualifying species	CPS (35 years)	Source (original EIAR, first AIR, second AIR)	Determination of AEoSI
Buchan Ness to Collieston Coast	Guillemot	0.869-0.747	First AIR	<b>AEoSI</b>
	Herring gull	0.973	Original EIAR	No AEoSI
	Kittiwake	0.901-0.866	First AIR	<b>AEoSI</b>
Cape Wrath	Kittiwake*	0.978-0.970	Second AIR	No AEoSI
East Caithness Cliffs	Kittiwake	0.826-0.734	First AIR	<b>AEoSI</b>
Fair Isle	Gannet	0.970-0.942	Second AIR	No AEoSI
	Kittiwake***	0.869-0.812	Second AIR	<b>AEoSI</b>
	Puffin*	0.985-0.963	Second AIR	No AEoSI
Forth Islands	Gannet	0.860-0.807	Original EIAR	<b>AEoSI</b>
	Kittiwake	0.869-0.804	First AIR	<b>AEoSI</b>
	Puffin	0.913-0.834	Second AIR	<b>AEoSI</b>
Fowlsheugh	Kittiwake	0.859-0.804	First AIR	<b>AEoSI</b>
	Razorbill	0.791-0.646	First AIR	<b>AEoSI</b>
Hermaness, Saxa Ford & Valla Field	Gannet	0.964-0.923	Second AIR	No AEoSI
Hoy	Puffin*	0.928-0.812	Second AIR	<b>AEoSI</b>
Marwick Head	Kittiwake	0.941-0.916	Second AIR	No AEoSI
North Caithness Cliffs	Kittiwake	0.893-0.850	First AIR	<b>AEoSI</b>
	Puffin*	0.773-0.655	Second AIR	<b>AEoSI</b>
North Rona & Sula Sgeir	Gannet	0.985-0.992	Second AIR	No AEoSI
Noss	Gannet	0.967-0.934	Second AIR	No AEoSI
Rousay	Kittiwake	0.652-0.531	Second AIR	<b>AEoSI</b>
St Abb's Head to Fast Castle	Kittiwake	0.413-0.287	First AIR	<b>AEoSI</b>
Sule Skerry & Sule Stack	Gannet	0.918-0.910	Second AIR	No AEoSI
Troup, Pennan and Lion's Heads	Guillemot	0.929-0.861	First AIR	<b>AEoSI</b>
	Kittiwake	0.904-0.859	First AIR	<b>AEoSI</b>
	Razorbill	0.938-0.860	First AIR	<b>Unable to conclude no AEoSI</b>
West Westray	Kittiwake	0.708-0.602	First AIR	<b>AEoSI</b>

Moreover, we provide updated advice on the conclusions of AEoSI for each of the functionally linked breeding colonies of the Outer Firth of Forth and St Andrews Bay Complex (OFFSABC) SPA in

Table A-14 below. This table is an updated version of Table 4 from our response to the first Additional Information Report, dated 18 November 2025, which should supersede previous NatureScot advice.

*Table A-14. Summary of final conclusions of AEoSI for each of the functionally linked breeding colonies of the OFFSABC and comparison with previous advice: original Environmental Impact Assessment Report (EIAR) from 05 December 2024, first Additional Information Report (AIR) from 08 October 2025, second Additional Information Report (AIR) from this consultation. Conclusions of AEoSI are bolded, with any differences based on this consultation shaded in green.*

<b>Special Protection Area (SPA)</b>	<b>Qualifying species</b>	<b>Source (original EIAR, first AIR, second AIR)</b>	<b>Determination of AEoSI</b>
Buchan Ness to Collieston Coast	Guillemot	First AIR	<b>AEoSI alone and in-combination</b>
	Kittiwake	First AIR	<b>AEoSI in-combination</b>
Forth Islands	Gannet	Original EIAR	<b>AEoSI in-combination</b>
	Kittiwake	First AIR	<b>AEoSI in-combination</b>
	Puffin	Second AIR	<b>AEoSI in-combination</b>
Fowlsheugh	Kittiwake	First AIR	<b>AEoSI in-combination</b>
St Abb's Head to Fast Castle	Kittiwake	First AIR	<b>AEoSI in-combination</b>
Troup, Pennan and Lion's Heads	Kittiwake	First AIR	<b>AEoSI in-combination</b>
West Westray	Kittiwake	First AIR	<b>AEoSI in-combination</b>

For final NatureScot advice on the project-alone conclusions of AEoSI, these can be found in Table 1 of our response to the first Additional Information Report, dated 18 November 2025.

#### **A.5 Updated mean estimates for CRM**

Our advice on the original application on 04 March 2025 highlighted that the monthly collision mortality estimates did not sum to the relevant seasonal or annual collision mortality totals. Our advice on the additional information submission on 18 November 2025 again highlighted this issue and explained that monthly mean collision estimates are required in order for future Applicants to use these estimates to calculate seasonal and monthly collision mortality totals.

This updated report on the use of mean collision mortality estimates does not provide the monthly or seasonal mean collision estimates and only presents annual mean collision mortality estimates for four species. The exception is gannet, for which seasonal mean collision mortality estimates, and apportioned annual mean collision mortality estimates are provided. Table A-15 summarises the information provided in this update.

We highlight that in our advice via email on 16 December 2025, we advised that “annual mean collision estimates have been provided for use in the Appropriate Assessment. However, monthly and seasonal mean collision mortality estimates are still required for all eight species assessed in

the original collision risk modelling technical report”. This information has not been provided in this report.

Table A-15. Overview of the mean collision estimates provided in the current in-combination Additional Information Report, based on what was requested previously on 16 December 2025.

Species	Monthly mean collisions	Seasonal mean collisions	Annual mean collisions	Apportioned mean collisions
Kittiwake	x	x	✓	x
Herring gull	x	x	✓	x
Great black-backed gull	x	x	✓	x
Gannet	x	✓	✓	Annual only
Arctic tern	x	x	x	x
Common tern	x	x	x	x
Common gull	x	x	x	x
Fulmar	x	x	x	x

On 16 December 2025, we also advised that the mean and median collision mortality estimates for gannet in Table 3.2 were presented the wrong way around, i.e. the values under the column header “Mean CRM impacts” are actually the median collision mortality estimates which were presented in the original application, and vice versa. This was made evident as the annual mean collision mortality estimates for gannet provided in Table 3.1 are greater than the median annual collision mortality estimates, which is not consistent with what is presented in Table 3.2.

Furthermore, the values in Table 3.2 have been cross-referenced with those in the original application (specifically the EIAR - Volume 3 - Chapter 11 - Appendix 11.5 - Annex G - Impacts to breeding adults) where the collision mortality estimates in this Annex match those under the column “Mean CRM impacts”, which we understand were median collision mortality estimates in the original application.

In the most recent version of the report received 09 January 2026, the mean and median CRM impacts columns have been swapped since our comments on 16 December 2025, however both the column headers and the collision mortality estimates have been swapped, therefore the issue has not been resolved.

#### A.5.1 Annex A: SPA Screening Tables

In Table 5.5 in Annex A: SPA Screening Tables, we have checked the values presented for gannet which appear to have correctly used the updated mean collision mortality estimates. Therefore, it appears the error in Table 3.2 as described above has not been carried through to the updated in-

combination assessment, but we flag this presentational error to those interpreting the information in the future.

We have been unable to check the values in Table 5.5 for kittiwake as the collision and displacement values have been combined, and the updated apportioned displacement mortality estimates (using the matrix approach and updated colony counts as presented in the additional information submission) have not yet been provided. As a result, we cannot confirm that the correct collision mortality estimates have been carried through to the in-combination PVA.

However, we are content that the report confirms the use of mean collision mortality estimates in the subsequent in-combination PVA work. We reiterate the importance of providing monthly, seasonal and apportioned mean collision mortality estimates for all species assessed in the original collision risk modelling report, to provide the necessary values for future in-combination assessments to be undertaken.

# **Natural Resources Wales**

**From:** [Marine Regulatory Policy and Approaches](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Redacted] ; [Marine Regulatory Policy and Approaches](#)  
**Subject:** RE: Muir Mhor Offshore Wind Farm - Request for comments on RIAA NRW:00212478  
**Date:** 10 March 2026 14:17:39  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

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Good afternoon,

I have discussed this within our Marine regulation and policy team and spoke to our Marine Area Advice and Management Team to see if we wish to comment on this application. .

Due to the location of the proposed project, distance from Welsh sites and features we will not be commenting on the Application / RIAA.

Thank you though for bringing this to our attention.

[Redacted]

**Uwch Swyddog Dulliau Rheoleiddio/**  
Senior Regulatory Approaches Officer  
**Tîm Polisi a Dull Rheoleiddio Morol/**  
Marine Regulatory Policy and Approaches Team



**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.**

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

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# **Northern Lighthouse Board**

**From:** [Redacted]  
**To:** [MD Marine Renewables](#)  
**Cc:** [Redacted]  
**Subject:** RE: [EXT] Muir Mhor Offshore Wind Farm Limited – Muir Mhor Offshore Wind Farm – Further Additional Information Consultation – Response Required by 25 February 2026  
**Date:** 15 January 2026 14:42:32  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Good afternoon,

NLB have no comment to provide with regard to this ornithological update.

Regards

[Redacted]

[Redacted]

Coastal Inspector  
Northern Lighthouse Board

T: 0131 473 3197

M: [Redacted]

E: [Redacted]

**RSPB**

## RSPB Scotland Response to Muir Mhòr Additional Information Report

March 2026

The Muir Mhòr Additional Information Report addresses two issues raised during the consenting process: (1) the need for in-combination PVAs across Muir Mhòr, Ossian and Caledonia; and (2) NatureScot's request for mean rather than median CRM outputs.

On the CRM question, the report reiterates that when MRSea is used to estimate densities using very small sample sizes, the upper confidence intervals of estimates can tend toward infinity which impacts the mean estimate. In these cases, the median is a more useful metric. The report demonstrates that switching from median to mean collision estimates makes negligible difference to predicted impacts. This would not alter compensation requirements.

The in-combination PVA screening identifies 16 SPA qualifying features, covering gannet, kittiwake and puffin across multiple SPAs. At each of these the % change in adult survival exceeded the 0.02% threshold. While these SPAs were previously identified as having connectivity, they were not identified as having AEoSI.

Having reviewed the PVA results included in the Additional Information Report we would flag seven SPAs where the estimated in combination impact is of concern (Table 1). These SPAs are estimated to have reductions of up to *ca.* 50% over 30 years and many populations are already declining.

**Table 1.** Summary of focal species counterfactual of population size (CPS) and associated confidence intervals (CI) for Special Protection Areas (SPAs) identified during revised scoping. CPS relate to NatureScot “High” Impact Scenario in combination with consented developments and relate to combined collision (kittiwake) and displacement (all species) impacts after 30 and 50 years.

Species	SPA	CPS 30y	CI	CPS 50y	CI
Guillemot	Sule Skerry	0.910	0.875-0.947	0.877	0.838-0.918
Kittiwake	Copinsay	0.747	0.617-0.906	0.667	0.544-0.815
	Fair Isle	0.812	0.697-0.948	0.748	0.636-0.879
	Rousay	0.531	0.439-0.639	0.414	0.338-0.506
Puffin	Forth Islands	0.834	0.810-0.856	0.777	0.748-0.803
	Hoy	0.812	0.572-1.130	0.750	0.468-1.170
	North Caithness Cliffs	0.655	0.579-0.734	0.555	0.472-0.653

**Table 2.** Summary of species count and percentage change since last census for selected SPA populations taken from the Seabirds Count database

Species	SPA	Population	Unit	% change
Guillemot	Sule Skerry	9000	Individuals	-21%
Kittiwake	Copinsay	955	Apparently Occupied Nests	-78%
	Fair Isle	448		-95%
	Rousay	330		-88%
Puffin	Forth Islands	42923	Apparently Occupied Burrows	-39%
	Hoy	430		n/a
	North Caithness Cliffs	3039		-56%

### Other text

1. Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change associated with Muir Mhòr Offshore Wind Farm in combination with other North Sea wind farms (including Ossian and Caledonia) are predicted to result in the annual population growth rate of **Guillemot at the Sule Skerry SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.996 and 0.998. This means that after the 30-year lifetime of Muir Mhòr Offshore Wind Farm, the population size of the SPA is expected to be between **87.5 and 94.7%** of what it would have been in the absence of the development.
2. Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change and collision mortality associated with Muir Mhòr Offshore Wind Farm in combination with other North Sea wind farms (including Ossian and Caledonia) are predicted to result in the annual population growth rate of **Kittiwake at the Copinsay SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.987 and 0.996. This means that after the 30-year lifetime of Muir Mhòr Offshore Wind Farm, the population size of the SPA is expected to be between **61.7 and 90.6%** of what it would have been in the absence of the development.
3. Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change and collision mortality associated with Muir Mhòr Offshore Wind Farm in combination with other North Sea wind farms (including Ossian and Caledonia) are predicted to result in the annual population growth rate of **Kittiwake at**

**the Fair Isle SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.991 and 0.998. This means that after the 30-year lifetime of Muir Mhòr Offshore Wind Farm, the population size of the SPA is expected to be between **69.7 and 94.8%** of what it would have been in the absence of the development.

4. Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change and collision mortality associated with Muir Mhòr Offshore Wind Farm in combination with other North Sea wind farms (including Ossian and Caledonia) are predicted to result in the annual population growth rate of **Kittiwake at the Rousay SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.978 and 0.987. This means that after the 30-year lifetime of Muir Mhòr Offshore Wind Farm, the population size of the SPA is expected to be between **43.9 and 63.9%** of what it would have been in the absence of the development.
5. Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change associated with Muir Mhòr Offshore Wind Farm in combination with other North Sea wind farms (including Ossian and Caledonia) are predicted to result in the annual population growth rate of **Puffin at the Forth Islands SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.994 and 0.996. This means that after the 30-year lifetime of Muir Mhòr Offshore Wind Farm, the population size of the SPA is expected to be between **81.0 and 85.6%** of what it would have been in the absence of the development.
6. Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change associated with Muir Mhòr Offshore Wind Farm in combination with other North Sea wind farms (including Ossian and Caledonia) are predicted to result in the annual population growth rate of **Puffin at the Hoy SPA** declining with a ratio of impacted to unimpacted population growth rate of between 0.985 and 1.000. This means that after the 30-year lifetime of Muir Mhòr Offshore Wind Farm, the population size of the SPA is expected to be between **57.2 and 113.0%** of what it would have been in the absence of the development.
7. Within the range of likely mortalities derived using the methods advocated by NatureScot, Marine Scotland Science and the RSPB during scoping, the impacts arising from distributional change associated with Muir Mhòr Offshore Wind Farm in combination with other North Sea wind farms (including Ossian and Caledonia) are predicted to result in the annual population growth rate of **Puffin at the North Caithness Cliffs SPA** declining with a ratio of impacted to unimpacted population growth rate of

between 0.985 and 0.991. This means that after the 30-year lifetime of Muir Mhòr Offshore Wind Farm, the population size of the SPA is expected to be between **57.9 and 73.4%** of what it would have been in the absence of the development.

**SEPA**

**From:** [Planning.North](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** PCS-20007776 SEPA Response to  
**Date:** 16 January 2026 09:31:14  
**Attachments:** [image.png](#)

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To Whom It May Concern

**Marine (Scotland) Act 2010**  
**Muir Mhor Offshore Wind Farm**  
**Approximately 63 km east of Peterhead**

Thank you for the above consultation. The additional information provided is outwith SEPA's remit and we therefore have no further comment.

Kind regards

[Redacted]

Senior Planning Officer



For the future of our environment

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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu [postmaster@sepa.org.uk](mailto:postmaster@sepa.org.uk). Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhraid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1 4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghlèidheadh agus airson adhbharan laghail eile.

# **Scottish Fisherman's Federation**

**From:** [Redacted]  
**To:** [MD Marine Renewables](#)  
**Cc:** [Redacted] [Redacted]  
**Subject:** Re: Muir Mhor Offshore Wind Farm Limited – Muir Mhor Offshore Wind Farm – Further Additional Information Consultation – Response Required by 25 February 2026  
**Date:** 25 February 2026 13:12:03  
**Attachments:** [image002.png](#)  
[Outlook- Users\\_ali](#)

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To the Licensing Officer for this case,

Thank you for the opportunity to participate in the statutory consultation regarding Further Additional Information Submission for the Muir Mhor Offshore Wind Farm. After reviewing the materials provided, we have no comments or suggestions to offer at this time. Please consider this as a formal response indicating no comments from Scottish Fishermen's Federation.

I would appreciate confirmation of receipt of this email for our audit purposes.

Regards,

[Redacted]

[Redacted]

Offshore Consents Assessments Manager

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### Scottish Fishermen's Federation

24 Rubislaw Terrace | Aberdeen | AB10 1XE

T: +44 (0) 1224 039088 | M: [Redacted]

E: [Redacted] | [sff.co.uk](http://sff.co.uk)

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Registered Address | Scottish Fishermen's Federation (SFF) | 24 Rubislaw Terrace | Aberdeen | AB10 1XE

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# **Transport Scotland**

**From:** [Redacted]  
**To:** [MD Marine Renewables](#)  
**Cc:** [Redacted]  
**Subject:** A90 - Muir Mhor Offshore Wind Farm – Further Additional Information Consultation – Transport Scotland Comments - 2-Feb-26  
**Date:** 02 February 2026 14:24:28  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image002.png](#)

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## FAO Marine Directorate

Good afternoon,

Thank you for the opportunity for Transport Scotland to comment on the Further Additional Information (FAI) submitted in support of the Muir Mhor Offshore Wind Farm.

We were previously consulted on the Offshore Environmental Impact Assessment Report (EIAR) for this application and provided comments in our letter dated 2<sup>nd</sup> February 2025. In that correspondence, we concluded that the offshore elements of the project are unlikely to have any discernible impact on the trunk road network. We also indicated that we would await consultation regarding the Onshore EIAR. We were further consulted on Additional Information to which we responded on 19<sup>th</sup> November 2025, within which we noted that the AI had no bearing on the operation of the trunk road network.

Having reviewed the FAI, I note that this has been prepared in response to feedback received from NatureScot and relates to ornithological collision mortality values. As these updates have no bearing on the operation of the trunk road network, I can again confirm that Transport Scotland has no further comments to provide at this time and that our conclusions from our previous responses remain valid.

I hope this helps.

Kind regards,

[Redacted]

Development Management  
Roads Delivery & Operations

[transport.gov.scot](https://transport.gov.scot)

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



Transport Scotland, the national transport agency  
*Còmhdaill Alba, buidheann nàiseanta na còmhdaill*

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