

# Historic Environment Scotland



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

By email to:

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

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

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

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

Our case ID: 300065561  
Your ref: MS-00010921

20 March 2025

Dear Marine Directorate

### Marine (Scotland) Act 2010

### Culzean Floating Offshore Wind Turbine Pilot Project - Post Consent Plans - Development Specification and Layout Plan (DSLIP)

Thank you for your consultation which we received on 26 February 2025 seeking our comments on the DSLIP for the above project.

We note that Section 1.1 of the DSLIP has confirmed that the design and layout parameters of the project align with those considered in the application for the Marine Licence Consent. We also understand that micro-siting of the export cable has been proposed by the Licensee, as indicated by the "Optimised Route" in Figure 3-6 of the DSLIP.

Having reviewed the submission, we have no comments on this DSLIP.

We hope this is helpful. Please contact us if you have any questions about this letter. The officer managing this case is Adrian Lee who can be contacted by phone on 0131 668 8600 or by email at [adrian.lee@hes.scot](mailto:adrian.lee@hes.scot).

Yours sincerely

Historic Environment Scotland

# Maritime and Coastguard Agency

**From:** [navigation\\_safety](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Toni-marie McGinn](#); [Ben Walker](#); [Amy Woodward](#); [Nick Salter](#); [Vinu John](#); [Pete Lawson](#); [Vaughan Jackson](#)  
**Subject:** RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans -Development Specification and Layout Plan (DSLPL) - Consultation - Response Required by 26 March 2025  
**Date:** 04 March 2025 14:42:36  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)

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Good afternoon, Amy.

Thank you for the opportunity to comment on Development Specification and Layout Plan (DSLPL) for Culzean Floating Offshore Wind Turbine Pilot Project. The UK Technical Services Navigation team of the Maritime and Coastguard Agency has reviewed the document received. We would like to comment as follows:

It is noted in that the DSLPL has been prepared to address the specific requirements of the relevant conditions as stated in table 1.1 and that construction is planned to commence at some point in 2025. We note regarding moorings in 3.2.2.2 that a second set will be delivered to the project possibly in 2026. The applicant is reminded that compliance with Regulatory Expectations on Moorings for Floating Wind and Marine Devices (HSE and MCA, 2017) remains relevant guidance for floating infrastructure. This guidance should be followed, and a Third-Party Verification of new mooring arrangements will be required. We welcome the commitment from the applicant to update the DSLPL and submit for review before any changes taking place.

The MCA confirms that we are content with the DSLPL on this occasion. This is on the understanding that all maritime safety legislation and all conditions of consent and advisories are adhered to.

If you have any questions on this response, please let us know.

Kind regards,

Vaughan.

**Vaughan Jackson**

Offshore Renewables Project Lead  
UK Technical Services Navigation



Maritime &  
Coastguard  
Agency



**Maritime & Coastguard Agency**

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



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

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**Ministry of Defence**

**From:** [DIO-Safeguarding-Offshore \(MULTIUSER\)](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** 20250319\_MOD\_Response-Development Specification and Layout Plan (DSLPL)  
**Date:** 19 March 2025 11:37:47  
**Attachments:** [image001.png](#)

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Good morning,

Thank you for consulting the MOD and the development specification and layout plan, I can confirm that I have reviewed the relevant documents and the MOD has no comments to add.

Kind regards,

**Joanne Moore | Safeguarding Officer**

Defence Infrastructure Organisation  
Estates | Safeguarding  
DIO Head Office | St George's House | DMS Whittington | Lichfield | Staffordshire | WS14 9PY  
Email: [REDACTED]

NatureScot

**From:** [Clare McCarty](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Toni-marie McGinn](#); [Ben Walker](#); [Amy Woodward](#); [MARINEENERGY](#)  
**Subject:** RE: TotalEnergies E&P North Sea UK Limited - Post Consent Plans -Development Specification and Layout Plan (DSLPL) - Consultation - Response Required by 26 March 2025  
**Date:** 24 March 2025 16:02:40  
**Attachments:** [image001.png](#)

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Dear Amy,

Thank you for the consultation on the Development Specification and Layout Plan (DSLPL) for the Culzean Floating Offshore Wind Turbine Pilot Project, which has been submitted in order to satisfy condition 3.2.6 of the marine licence.

We have reviewed the document provided (Document Reference: GB-CZT-00-TOTA-000006) and have no substantive comment to make. We take note of section 3.2.2.2, which refers to the additional mooring system to be installed in 2026 or later as part of the pilot project, this states that the DSLPL will be updated at a later date once further details are finalised.

I trust this is of assistance.

Kind regards,  
Clare

**Clare McCarty** (she/her) | **Marine Sustainability Adviser**

Correspondence address: NatureScot | Battleby House | Redgorton | Perth | PH1 3EW | t: 01738 458 614

Seòladh puist: NàdarAlba | Taigh Battleby | Ràth a' Ghoirtein | Peairt | PH1 3EW

[nature.scot](https://www.nature.scot) | [@NatureScot](https://twitter.com/NatureScot) | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

# Northern Lighthouse Board



# Northern Lighthouse Board

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Email: [enquiries@nlb.org.uk](mailto:enquiries@nlb.org.uk)

Your Ref: Culzean FOWT Pilot Project - DSLP  
Our Ref: AL/OPS/ML/WIND\_019\_25

Ms Amy Woodward  
Licensing Operations Team – Marine Directorate  
Scottish Government  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

4 March 2025

## MARINE & COASTAL ACCESS ACT 2009

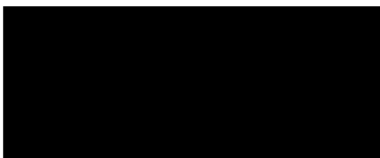
### TotalEnergies E&P North Sea UK Ltd - Culzean FOWT Pilot Project - Development Specification and Layout Plan (DSLPL)

Thank you for your e-mail correspondence dated 26<sup>th</sup> February 2025 relating to the Development Specification and Layout Plan (DSLPL) submitted by TotalEnergies E&P North Sea UK Ltd to satisfy the requirements of condition 3.2.6 of the marine licence (marine licence number MS-00010921).

Northern Lighthouse Board acknowledge the reference to the Lighting and Marking Plan within Section 3.6 of the DSLPL.

NLB have no objection to the DSLPL document, and no recommendations for alterations.

Yours sincerely



Peter Douglas  
Navigation Manager

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To find out more, please see our Privacy Notice at [www.nlb.org.uk/legal-notices/](http://www.nlb.org.uk/legal-notices/)

# Scottish Fishermen's Federation



Our Ref: FH-Culzean DSLP/25-0001

Your Ref: TotalEnergies E&P North Sea UK Limited - Post Consent Plans -Development Specification and Layout Plan (DSLP) - Consultation

E-mail: dated 21/02/25  
[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)

26 March 2025

Dear Amy Woodward,

Scottish Fishermen's  
Federation

24 Rubislaw Terrace  
Aberdeen, AB10 1XE  
Scotland UK

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

[www.sff.co.uk](http://www.sff.co.uk)

**SFF Response to TotalEnergies E&P North Sea UK Limited - Post Consent Plans -Development Specification and Layout Plan (DSLP) Consultation**

This response to the above DSLP consultation is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association. Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association.

The SFF appreciates the opportunity to comment on this DSLP and has the following points to raise:

**Scour protection**

The SFF note lack of scour protection design in Figure 3-3 (p16). As there is the possibility of scour creation by mooring lines as they will be anchored, we propose scour protection measures to be included in the DSLP to prevent scar creation on the seabed.

**Innovative moorings**

The SFF note from Sub-section 3.2.2.2. that a second set of mooring lines is planned for installation in 2026 (or beyond). This additional mooring system is a trial (part of the pilot nature of the project) to test a new, innovative and low-impact mooring techniques with the aim to assess their feasibility for future electrification projects.

We would like to be kept informed of the results from the second mooring lines which are part of the innovation.

Members:

Anglo Scottish Fishermen's Association Fife Fishermen's Association Fishing Vessel Agents & Owners Association (Scotland) Ltd  
Mallaig & North-West Fishermen's Association Ltd Orkney Fisheries Association Scottish Pelagic Fishermen's Association Ltd  
The Scottish White Fish Producers' Association Ltd Shetland Fishermen's Association

VAT Reg No: 605 096 748

### **Export cable corridor**

The SFF note from Sub-section 3.7 (p23) that the cable will be buried along its length or protected where burial is not possible. Full details of the cable installation methods and cable protection arrangements will be provided in the Culzean Floating Wind CaP.

We would like to be updated on the CaP to see if any boulder relocation and cable protection is required. We propose the coordinates of any relocated boulders and rock placement be shared with fishermen in WGS84 format with degree and decimal of minute.

### **Decommissioning**

As highlighted in our previous consultation responses, the concerns of fishermen are primarily that of safety and the physical impact on the fishing grounds of the long-term presence of subsea infrastructure on the seabed. With this in mind, the SFF's preferred position with regard to the decommissioning of offshore windfarm is one of total removal. We will look to have the seabed returned to as near a condition after decommissioning of mooring anchors as pre-installation.

Where any scours are created by mooring lines or anchors, we would recommend mechanical backfilling of the trench/scour followed by overtrawl sweeps to ensure no snagging hazard is left behind on the seabed to fishing vessels.

Best regards

Fahim Hashimi

**Offshore Energy Policy Manager**  
**Scottish Fishermen's Federation**