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LICENCE/CONSENT VARIATION – VALIDATION OF APPROPRIATE ASSESSMENT

1 Licence Details

<u>Licensee/Developer Name:</u>	Moray Offshore Windfarm (West) Limited
<u>Site Details:</u>	The Moray West Offshore Wind Farm Development, Located Approximately 22.5 Kilometres Southeast From The Caithness Coastline
<u>Date Existing Licence/Consent Issued:</u>	Section 36 Consent issued on 14 June 2019
<u>Date of Existing Appropriate Assessment (“AA”):</u>	26 April 2019

2 Summary of proposed variation application:

<p>The variation application proposes to change:</p> <ol style="list-style-type: none">1. The physical parameters of the Wind Turbine Generators (“WTG”) under the consented 72 WTG scenario by increasing the blade width from 6 metres to 6.6 metres, and2. Remove reference to a maximum generating capacity of around 850MW.

3 Summary of consultation responses – in relation to European protected sites:

<p>NatureScot confirmed it had no comments to make on the variation application. NatureScot did highlight that the revised collision risk estimates for kittiwake, great black-backed gull, herring gull and gannet were lower than those used to support the original application and the consent decision. Therefore NatureScot agreed that the conclusions reached by the Developer and Scottish Ministers remain valid.</p>
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In regards to the increase in blade width, **The Royal Society for the Protection of Birds (“RSPB”) Scotland** considers that a substantial impact to seabirds from the proposed development remains and is disappointed that no further steps have been taken to reduce collision risk.

RSPB Scotland believes increasing the generating output without increasing the environmental impacts is logical in principle, and ultimately expect the generation capacity limit to be constrained by the grid connection and offshore export cable capacity.

RSPB Scotland concludes that wind turbine technology has developed further since the consent was granted and that generating a similar capacity with fewer, higher output turbines could realise a substantial reduction in impacts to seabirds. RSPB Scotland would welcome further consideration to the potential opportunities that may exist for reducing the substantial impacts to seabirds.

1. Summary of other information in relation to European protected sites (MSS responses, external reports).

Marine Scotland Science (“MSS”) agrees with NatureScot that the variation application does not exceed the worst case scenario assumptions used in assessment. MSS does note that although comparative analysis has been undertaken to compare the physical parameter change in the blade width, operational parameters such as rotor speed, pitch and percentage time operational (which are parameters in collision risk modelling) have remained unchanged.

With regards to marine mammals MSS is content with the proposed variation, providing that maximum hammer energy for piling remains within the levels included in the consent decision.

4 Conclusion - Consideration of whether AA completed for the original decision is still valid:

Annex D Appropriate Assessment Validation

No consultation responses or representations have been received which would invalidate the conclusions or alter the outcome of the AA completed in respect of the Moray West Section 36 Consent dated 26 April 2019.

MS-LOT concludes that Moray Offshore Windfarm (West) Limited's proposed change to increasing the blade width from 6m to 6.6m under the consented 72 WTG scenario and removing reference to a maximum generation capacity of 850MW will not have an adverse impact on the Buchan Ness to Collieston Coast Special Protection Area ("SPA"), East Caithness Cliffs SPA, North Caithness Cliffs SPA, Troup, Pennan and Lion's Head SPA, Moray Firth SPA, Moray Firth Special Area of Conservation ("SAC") or Dornoch Firth and Morrich More SAC providing the conditions of the original AA are adhered to.

Name	Assessor or Approver	Date
Mark McCormack	Assessor	20 December 2021
Kerry Bell	Approver	21 December 2021