MUIR MHÒR
OFFSHORE WIND FARM

A joint venture between Fred. Olsen Seawind & Vattenfall

Additional Information Report

Muir Mhòr Offshore Wind Farm

Additional Information Report

Non-Technical Summary

Revision No.	Date	Reason for Issue	Author	Reviewer	Approver
01	23/09/2025	Final	GoBe Consultants Ltd.	GoBe Consultants Ltd.	MM OWF Ltd.

Document Information

Document ID	**MMH-GBE-A004-CNT-0005-000**
Revision	1
Date	23/09/2025

Contents

1. Introduction 1

1.1. Background 1
1.2. The Applicant 1
1.3. Application 2
1.4. Purpose of the Additional Information Report 4
1.5. Purpose of this Document 6

2. Stakeholder Consultation 6

3. Non-Technical Chapter Summaries 8

3.1. Offshore Ornithology 8

Environmental Impact Assessment 8
Report to Inform Appropriate Assessment 9
Compensation 9

3.2. Fish Ecology 10
3.3. Commercial Fisheries 11
3.4. Revisions Following Consultee Input 11

Socio-Economics Commercial Fisheries Update 11
Marine Mammal Revised assessment 12

Figures

Figure 1.1 Muir Mhòr Offshore Wind Farm – Array Area and Export Cable Corridor 3

Tables

Table 1.1 Breakdown of MD-LOT's Additional Information Request and Where it has been Dealt With in the Additional Information Report 4

Table 2.1 Post Application Consultation Undertaken with Consultees and Where in the AIR Each Point has Been Addressed 6

Glossary

Term	Definition
Applicant	Muir Mhòr Offshore Wind Farm Limited.
Array Area	The area in which the generation infrastructure (including Wind Turbine Generators and associated foundations, Inter-array Cables, and Interconnector cable) and Offshore Electrical Platform(s) will be located.
E2	The ScotWind Plan Option Area where the Proposed Development is located
EIA Regulations	Collectively the term used to refer to The Electricity Works (Additional Environmental Information) (Scotland) Regulations 2017, The Marine Works (Additional Environmental Information) Regulations 2007, and The Marine Works (Additional Environmental Information) (Scotland) Regulations 2017.
Floating foundations	The floating structures on which the Wind Turbine Generators are installed.
Foundation anchors	The structures which anchor the Floating Foundations to the seabed, connected to the foundation mooring.
Foundation mooring	The mooring structures which connect the Floating Foundations to the Foundation anchors.
Habitats Regulations	The Conservation (Natural Habitats, &c.) Regulations 1994, the Conservation of Offshore Marine Habitats and Species Regulations 2017 and the Conservation of Habitats and Species Regulations 2017
Horizontal Directional Drilling	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
Inter-array Cables	Cables which link the Wind Turbine Generators to each other and to the Offshore Electrical Platform(s).
Interconnector cable	Cable which links the Offshore Electrical Platforms to one another, allowing for power to be transferred between the platforms.
Landfall	The area between Mean High Water Springs and Mean Low Water Springs where the Offshore export cables are brought onshore.
Offshore Electrical Platform (OEP)	Offshore platform consisting of High Voltage Alternating Current equipment, details depending on the final electrical set up of the Project.
Offshore Export Cable Corridor (ECC)	The area within which the Offshore export cable(s) will be installed.
Offshore export cable(s)	The subsea electricity cable circuits running from the Offshore Electrical Platform(s) to the landfall which will transmit the electricity generated by the offshore wind farm to the onshore export cable(s) for transmission onwards to the onshore substation and the national electrical transmission system along with auxiliary cables such as fibre optic cables.
Offshore transmission infrastructure	The proposed transmission infrastructure comprising: Offshore Electrical Platform(s) and associated foundations and substructures; the Offshore export cable(s); and the landfall area up to Mean High Water Springs.
Project	Muir Mhòr Offshore Wind Farm – comprises the wind farm and all associated offshore and onshore components.
Proposed Development	The Muir Mhòr Offshore Wind Farm project elements to which the Offshore Environmental Impact Assessment Report relates.
Scottish Territorial Waters	The waters that extend 12 nautical miles from the Scottish coast. Scotland has sovereignty over this territorial sea, airspace, and seabed.
Wind Turbine Generator (WTG)	The wind turbines that generate electricity consisting of tubular towers and blades attached to a nacelle housing mechanical and electrical generating equipment.

Acronyms

Term	Definition
AEOSI	Adverse Effect On Site Integrity
AIR	Additional Information Report
CRM	Collision Risk Modelling
DAERA	Department of Agriculture, Environment and Rural Affairs
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
GNS	Greater North Sea
GW	Gigawatt
HPAI	Highly Pathogenic Avian Influenza
ICES	International Council for the Exploration of the Sea
INNS	Invasive Non-Native Species
iPCoD	Interim Population Consequences of Disturbance Model
IROPI	Imperative Reasons of Overriding Public Interest
km	Kilometre
LSE	Likely Significant Effect
MAU	Marine Analytical Unit
MD-LOT	Marine Directorate - Licensing Operations Team
MD-SEDD	Marine Directorate – Science, Evidence, Data and Digital
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MU	Management Unit
MW	Megawatt
NPA	Norwegian Pelagic Association
NTS	National Trust Scotland
OEP	Offshore Electrical Platform
OFZ	Obstacle Free Zone
OWF	Offshore Wind Farm
PPP	Planning Permission in Principle
PVA	Population Viability Analysis
RIAA	Report to Inform Appropriate Assessment
RSPB	Royal Society for Protection of Birds
S(pot)	Spawning Potential
SFF	Scottish Fishermen's Federation
SMP	Seabird Monitoring Programme
SPA	Special Protection Area
SSC	Scottish Seabird Centre
UK	United Kingdom
WTG	Wind Turbine Generator

1. INTRODUCTION

1.1. BACKGROUND

1.1.1. In response to the Scottish Government's target of net-zero emissions of all greenhouse gases by 2045 and the aim to generate 50% of Scotland's overall energy consumption from renewable sources by 2030, the Crown Estate Scotland launched the ScotWind Leasing process in 2020, which released new areas of seabed within Scottish waters for future offshore development. The ambition was to offer offshore wind generating capacity within a series of Plan Options, identified by the Scottish Government as the most suitable areas for development as set out within the Sectoral Marine Plan for Offshore Wind Energy.

1.1.2. As part of the Crown Estate Scotland ScotWind leasing process in January 2022, the Applicant (Muir Mhòr Offshore Wind Farm Limited), was identified as the successful bidder and awarded an Option Agreement (granting exclusive rights for offshore wind development) for what the Applicant has named the Muir Mhòr Offshore Wind Farm (hereafter 'the Project'), located within the E2 Plan Option area. The Muir Mhòr Array Area covers an area of approximately 200 kilometres squared (km^2) and is located approximately 63 kilometres (km) east of Peterhead on the east coast of Scotland (Figure 1.1). The Project is anticipated to have a capacity of approximately 1 Gigawatt (GW) comprising floating offshore wind technology.

1.1.3. The Project is comprised of both the offshore and onshore infrastructure required to generate and transmit electricity from the Array Area to the National Grid. The subject of this Additional Information Report (AIR) is the offshore infrastructure only (hereafter 'the Proposed Development').

1.1.4. The offshore infrastructure of the Proposed Development includes Wind Turbine Generators (WTGs) and associated floating foundations, the Offshore Electrical Platforms (OEP(s)) and their associated fixed foundations, the Inter-array Cables, an Interconnector cable, Offshore export cables and Landfall.

1.2. THE APPLICANT

1.1.5. The Applicant is an equal joint venture between Fred. Olsen Seawind Limited and Vattenfall Wind Power Limited. The Applicant brings together a unique combination of financial, technical and project development capability, a commitment to delivery, and a clear vision for the Project.

Fred. Olsen Seawind VATTENFALL

1.1.6. Fred. Olsen Seawind Limited is an established offshore wind Applicant building on Fred. Olsen Renewables' 25 years wind track record, market presence and portfolio. Fred. Olsen has extensive experience in Scotland gained through over 25 years of development, construction, and operation of onshore wind in the region. Fred. Olsen Seawind is active in Ireland, Norway and Scotland and is exploring opportunities in new markets.

1.1.7. Vattenfall Wind Power Limited is one of Europe's largest producers and retailers of electricity and heat. Vattenfall Wind Power Limited has been working in the UK for more than ten years, developing fossil fuel-free energy projects. Vattenfall Wind Power Limited have grown their

wind business from one project in 2008 to 11 in 2023. Vattenfall Wind Power Limited currently operates more than 1 GW of wind energy capacity in the UK. In Scotland, their operational wind farms comprise a total generating capacity of approximately 1 GW, powering over 130,000 homes. This includes the 96.8 Megawatt (MW) European Offshore Wind Deployment Centre in Aberdeen Bay, offering the domestic supply chain the chance to test and demonstrate the latest innovations in a real-world environment. Vattenfall Wind Power Limited is also constructing South Kyle, a 240 MW onshore wind project in south-west Scotland.

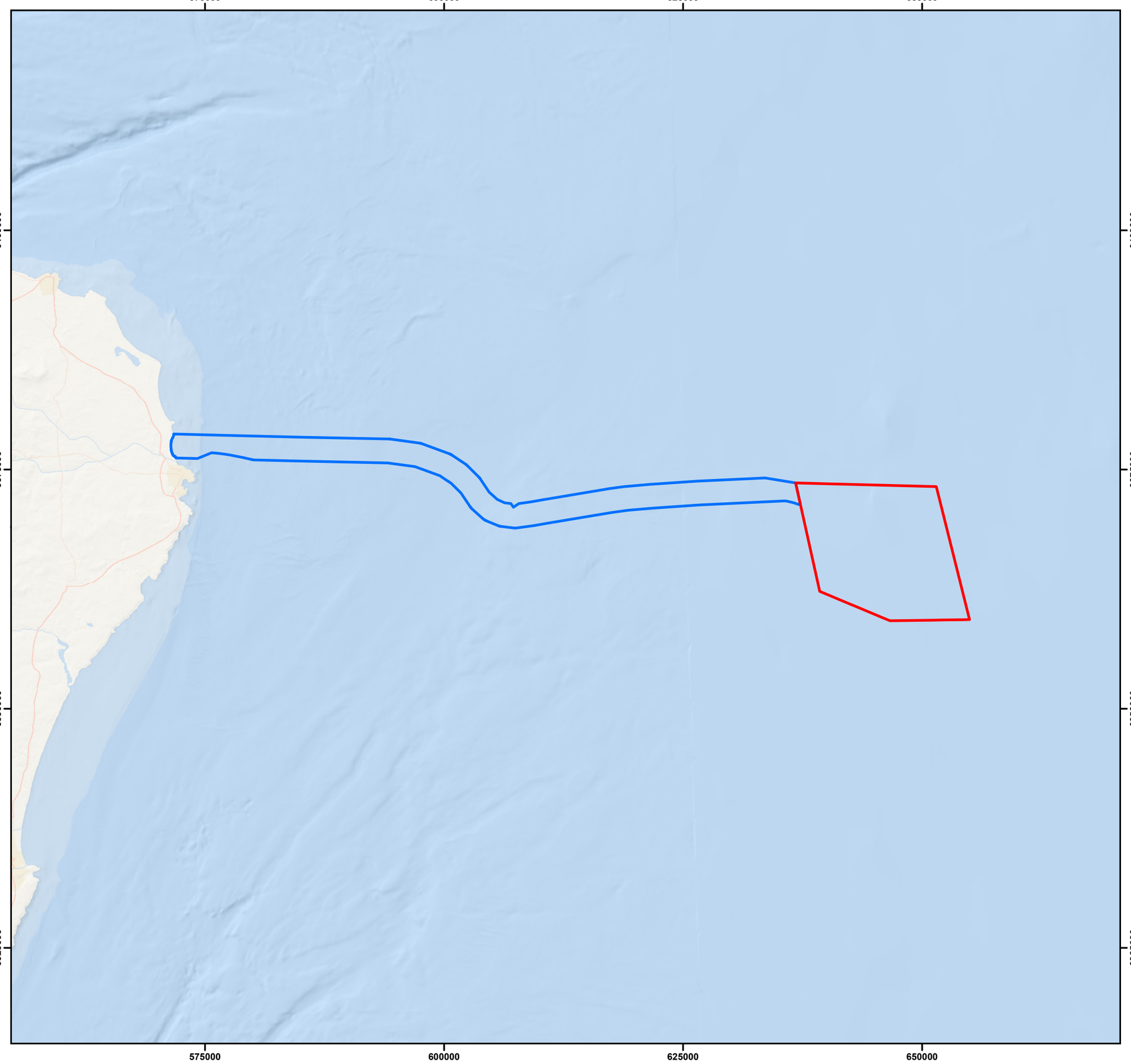
1.3. APPLICATION

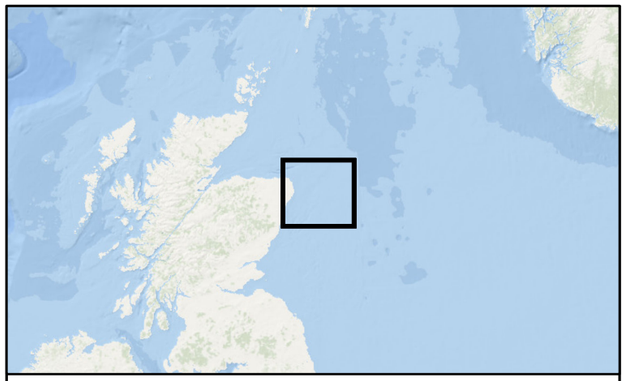
1.1.8. An application for consent under Section 36 of the Electricity Act 1989 and Marine Licences under section 20 of the Marine (Scotland) Act 2010 and section 65 of the Marine and Coastal Act 2009 for the Proposed Development was submitted to Scottish Minsters in November 2024.

1.1.9. The application for the Proposed Development included the following documentation:

- Environmental Impact Assessment Report (EIAR) which presents information on the assessment of the likely significant effects of the Proposed Development on various receptors from a range of impacts. This included a Non-Technical Summary and Volumes 1 to 4:
  - Volume 1: Offshore EIAR Introductory Chapters 1 to 6;
  - Volume 2: Offshore EIAR Chapters 7 to 22;
  - Volume 3: Offshore EIAR Technical Reports (Appendices to Chapters 3 to 18); and
  - Volume 4: Offshore EIAR Supporting Documents.
- Report to Inform an Appropriate Assessment (RIAA) which provides information to inform an assessment of the effects of the Proposed Development on the integrity of European sites in relation to their Conservation Objectives; and
- Derogation Case prepared under the derogation provisions of the Habitats Regulations to demonstrate the need for the Proposed Development, the absence of alternative solutions, the Imperative Reasons of Overriding Public Interest (IROPI) in the Proposed Development proceeding, as well as presenting the compensatory measures to be secured.

1.1.10. The Applicant submitted an application for Planning Permission in Principle (PPP) for the onshore elements of the Project (the onshore components of the Project landward of Mean Low Water Springs (MLWS)) to Aberdeenshire Council in December 2024. Aberdeenshire Council granted PPP on 19 June 2025.





Legend:

- Array Area
- Offshore Export Cable Corridor

Project:	Report:
Muir Mhòr	Non-Technical Summary

Muir Mhor Offshore Wind Farm -
Array Area and Export Cable Corridor

Figure: 1-1	Drawing No: GoBe-0192		
Revision:	Date:	Drawn:	Checked:
01	31/10/24	[Redacted]	[Redacted]

Map scale 1:400,000 @ A3

0 5 10 km

Co-ordinate system: ETRS 1989 UTM Zone 30N **EPSG:** 25830

MUIR MHÒR
OFFSHORE WIND FARM
A joint venture between Fred. Olsen Seawind & Vattenfall

Service Layer Credits: Esri, Garmin, GEBCO, NOAA NGDC, and other contributors

1.4. PURPOSE OF THE ADDITIONAL INFORMATION REPORT

1.1.11. Following the review of the application for the Proposed Development, and upon receipt of representations from consultees, Marine Directorate – Licensing Operations Team (MD-LOT) issued an additional information request to the Applicant on 9 April 2025 under:

- Regulation 21 of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017; and
- Regulation 19 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

1.1.12. The additional information request has been made to the Applicant for the provision of further information to allow Scottish Ministers to make a reasoned conclusion on the significance of the effects of the Proposed Development on the environment, and also to provide clarity on several specific points raised by consultees.

1.1.13. This AIR has been prepared by the Applicant to address certain consultee responses, received from MD-LOT on April 9th 2025, in support of the application made for the Proposed Development in November 2024. Table 1.1 contains the information request from MD-LOT and where in the AIR each has been addressed.

Table 1.1 Breakdown of MD-LOT's Additional Information Request and Where it has been Dealt With in the Additional Information Report

Description / Summary of Issues Raised	Where This has Been Considered in the AIR
Ornithology	
Due to issues with the SeabORD modelling method, NatureScot, the Royal Society for the Protection of Birds (RSPB) and Natural England are unable to reach conclusions with respect to several species/Special Protection Area (SPA) colony combinations and require additional information before providing their final ornithology advice. NatureScot request clarification from the Applicant regarding why the more recent population counts were not used in the assessment. NatureScot highlights that there are errors in the mortality figures used for Kittiwake and subsequently in survival rates and therefore require all relevant modelling to be repeated with the resulting change in survival rate presented. NatureScot request that cumulative impact values are presented to determine whether a cumulative Population Viability Analysis (PVA) is required for certain species.	Chapter 2: Offshore Ornithology EIA Chapter 3: Ornithology RIAA Chapter 4: Compensation Package
Commercial Fisheries	
Marine Directorate – Science, Evidence, Data and Digital (MD-SEDD) requests clarification over whether the *Nephrops* fleet is included in the UK demersal otter trawl sections of the impact assessment. MD-SEDD advises clarification is required regarding the cumulative effects assessment as the report contradicts itself.	Chapter 6: Commercial Fisheries

Description / Summary of Issues Raised	Where This has Been Considered in the AIR
MD-SEDD advises that there are multiple inconsistencies in the 'Assessment of likely significant effects' section, which make it unclear whether there is a significant effect or not for some impacts and these inconsistencies should be clarified.	
Shadow Derogation Case	
NatureScot advises that there is insufficient information to have confidence that the proposed measures are likely to compensate for the predicted impacts of the proposal to seabirds. MD-LOT advises that the Applicant updates its shadow derogation case.	Chapter 4: Compensation Package

1.1.14. Following submission of the EIAR in November 2024 and the subsequent review of consultee responses, the Applicant identified three topic areas that required further discussion in support of the application.

- Fish Ecology;
  - Concerns were raised by key consultees, relating to the potential for impacts on both sandeel and herring receptors. The Applicant has presented further contextualisation in this regard within the AIR;
- Socioeconomics;
  - Volume 2, Chapter 17 Socioeconomics, Tourism and Recreation of the EIAR had not fully incorporated the potentially significant residual effects with respect to 'reduction in access to, or exclusion from established fishing grounds within the array area';
- Marine Mammals;
  - NatureScot provided comment on Volume 2, Chapter 12: Marine Mammals of the EIAR, relating to the density used in the quantitative assessment for bottlenose dolphins in the Greater North Sea Management Unit: "Section 7.5.1 gives incorrect numbers of SCANS III Block R estimates for abundance (147) and density (0.0023 per km^2)".

1.1.15. Whilst not formally requested by MD-LOT, the Applicant has provided the following information with an aim to provide reassurance to consultees on the key issues raised in the consultation period relating to the aforementioned topics. The additional information is presented in the following Chapters:

- Chapter 5: Fish Ecology; and
- Chapter 7: Revisions Following Consultee Input containing:
  - Socioeconomics commercial fisheries update; and
  - Bottlenose Dolphin Refined Assessment.

1.5. PURPOSE OF THIS DOCUMENT

1.1.16. This document is a Non-Technical Summary of the AIR prepared for the Proposed Development in response to the additional information request received from MD-LOT. The EIAR, submitted in November 2024, provides the environmental information which has been gathered in order to carry out an assessment of the Likely Significant Effects (LSE) of the Proposed Development. The AIR provides additional context and data in relation to keys issues raised by consultees post-submission.

1.1.17. This Non-Technical Summary is intended to act as a stand-alone document that will provide an overview of the findings within the AIR in non-technical language. For more detailed information, the full AIR should be referred to and read alongside the EIAR submitted in November 2024 (see Volumes 1 to 4 of the EIAR).

2. STAKEHOLDER CONSULTATION

2.1.1. Table 2.1 contains a summary of consultation undertaken post application with consultees and where in the AIR each point has been considered.

Table 2.1 Post Application Consultation Undertaken with Consultees and Where in the AIR Each Point has Been Addressed

Consultee	Description / Summary of Issues Raised	Where This Has Been Considered in The AIR
Department of Agriculture, Environment and Rural Affairs (DAERA)	DAERA compared the project area and the foraging ranges from the Northern Ireland SPAs and concluded that three additional sites should be assessed within the RIAA.	Chapter 3: Ornithology RIAA
Floatation Energy	The conclusion of no Adverse Effect on Site Integrity (AEOSI) from the project alone should be reviewed as some estimated impacts are higher than expected. The proposed compensation of providing for predator eradication on islands in the Firth of Forth is ambitious and it is unclear how the efficacy of predator removal from the islands would be achieved or maintained for the duration of the project.	Chapter 3: Ornithology RIAA Chapter 4: Compensation Package
Marine Analytical Unit (MAU)	MAU raised concerns that there was only limited coverage of social impacts, and this could increase the uncertainty around some social impacts that could be associated with this project. Additionally, MAU suggested that using anecdotal evidence is not sufficiently robust for an assessment such as this.	Chapter 7: Revisions Following Consultee Input
MD-SEDD	MD-SEDD requested clarification about the assessment of Commercial Fisheries and Fish Ecology	Chapter 5: Fish Ecology Chapter 6: Commercial Fisheries
NatureScot	NatureScot raised queries across a variety of subjects including offshore ornithology, fish ecology and marine mammals, including requesting clarification on certain points and advising on future assessments.	Chapter 2: Offshore Ornithology EIA Chapter 3: Ornithology RIAA Chapter 4: Compensation

Consultee	Description / Summary of Issues Raised	Where This Has Been Considered in The AIR
		Package Chapter 5: Fish Ecology Chapter 6: Commercial Fisheries Chapter 7: Revisions Following Consultee Input
Norwegian Pelagic Association (NPA)	The NPA highlighted that International Council for the Exploration of the Sea (ICES) advice states: "that no activities on spawning habitats should be allowed unless the effects of these activities have been assessed and shown not to be detrimental" and claimed it is not clear in the EIA that this is the case for the proposed development.	Chapter 5: Fish Ecology Chapter 6: Commercial Fisheries
RSPB	RSPB Scotland's position is that they object to the Application due to being unable to reach a clear conclusion on the scale of the potential cumulative effects.	Chapter 2: Offshore Ornithology EIA Chapter 3: Ornithology RIAA Chapter 4: Compensation Package
Scottish Fishermen's Federation (SFF)	The SFF suggest that the Muir Mhòr array could detrimentally impact a significant number of fishing opportunities, and adversely impact the reproduction of the North Sea herring stock, which is the reason they object to the project.	Chapter 5: Fish Ecology Chapter 6: Commercial Fisheries

3. NON-TECHNICAL CHAPTER SUMMARIES

3.1. OFFSHORE ORNITHOLOGY

ENVIRONMENTAL IMPACT ASSESSMENT

3.1.1. Chapter 2: Offshore Ornithology EIA of the AIR sets out updates to the following based on advice from NatureScot:

- Regional population sizes;
- Assessment of distributional responses;
- Assessment of Collision Risk Modelling (CRM);
- Assessment of impact magnitude and species sensitivity;
- Cumulative Effects Assessment for additional species; and
- Information regarding the apportioning of impacts.

3.1.2. Regional population sizes for gannet, puffin and kittiwake were recommended by NatureScot and included a request for further information on why particular colony counts were used in the EIAR and others were not. Overall, the colony counts that NatureScot comment on were likely due to updates to available counts in the Seabird Monitoring Programme (SMP) database.

3.1.3. The approach to addressing the differences in colony counts for gannet due to Highly Pathogenic Avian Influenza (HPAI) were discussed with NatureScot and a comparison has been made between the predicted impacts from each year of survey data, as these occurred before and during the HPAI epidemic. This comparison shows a relatively large difference in predicted change in adult survival rates between the two years. However, it also shows that the absolute difference in the adult survival rates between these scenarios is small and so the conclusions of the EIAR are not affected.

3.1.4. Puffin colony counts from the North Caithness Cliffs SPA were agreed through consultation with NatureScot and used in the additional information assessment.

3.1.5. The kittiwake colony count for the Fowlsheugh SPA used in the EIAR was incorrect. Other differences in counts highlighted by NatureScot were due to updates to the SMP database.

3.1.6. NatureScot agreed that SeabORD was the most biologically accurate tool for assessing distributional responses but requested additional analyses using updated SeabORD code. As the updated code was unavailable, displacement matrices were applied, leading to higher predicted impacts for guillemot and razorbill, minor changes for puffin, and reduced impacts for kittiwake. These updates required revised PVAs but did not change the overall conclusions set out in the EIAR.

3.1.7. NatureScot noted discrepancies between the monthly, seasonal and annual collision mortality totals for kittiwake. An updated methodology for calculating these values is provided in this report. As such, no changes were made to the calculation of monthly, seasonal or annual kittiwake collision mortalities.

3.1.8. The EIAR was submitted on a timeline that did not allow new guidance from NatureScot on CRM avoidance rates to be used. An example from kittiwake is provided, and it was noted that these changes would not change the conclusions of the EIAR.

3.1.9. NatureScot commented that they disagreed with the magnitude and sensitivity approach taken in the EIAR and requested additional information on the assessment of significance using these values. It was demonstrated that these were the same value and therefore there was no error in the approach taken to assigning magnitude to the predicted impacts. NatureScot focused their assessment of magnitude on change in adult survival, while the EIAR considered additional factors in assigning magnitude to predicted impact levels, following the guidance published by the Chartered Institute of Ecology and Environmental Management.

3.1.10. It was also noted that the sensitivity criteria used in the EIAR did not use Scottish only sources of information to assign sensitivity and vulnerability to seabird species. A comparison was made between the approach recommended by NatureScot and the approach used in the EIAR. This showed that there was mostly no change for the majority of species. Where changes did occur, these reduced the sensitivity of species compared to the EIAR.

3.1.11. A cumulative impact assessment was not undertaken within the EIAR for most species due to negligible project-alone impacts, except for great black-backed gull, where cumulative PVA indicated the potential for significant impacts. However, the Applicant considers the PVA unsuitable for this species due to data limitations and likely overestimation of impacts.

3.1.12. A minor exclusion in the information on apportioning of impacts between seabird colonies was noted by NatureScot and updated tables have been presented to provide this information.

3.1.13. The results of updates and changes to the assessment which are included in this report do not change the conclusions of the EIAR.

REPORT TO INFORM APPROPRIATE ASSESSMENT

3.1.14. This Chapter of the AIR provides the further information requested by NatureScot in relation to Appropriate Assessment for Offshore and Intertidal Ornithology dated 4 March 2025.

3.1.15. The NatureScot advice related to the following three types of SPA addressed in this AIR as follows:

- Marine SPAs;
- Waterbird SPAs; and
- SPA Breeding Seabird Populations.

3.1.16. Project-alone impacts do not present an AEOSI for any SPA or species. However, in-combination impacts with other offshore wind farms (e.g., Berwick Bank, Green Volt) present risk of AEOSI for several SPAs and species, with some project contributions still deemed material, although lower based on the updated assessment. The (Applicant maintains that SeabORD remains the most robust approach and believes that displacement matrices likely overestimate impacts.

COMPENSATION

3.1.17. The Applicant has proposed to carry forward two compensation measures as submitted in November 2024. Both measures have been revised and updated to include more detail on their development and implementation and both involve partnering with local organisations who have the expertise required to carry out the proposed measures.

3.1.18. The partnerships are being finalised and their progress will depend on board approval for both Scottish Seabird Centre (SSC) and National Trust Scotland (NTS). All parties are committed to progressing these partnerships. However, if a partnership does not materialise, the

Applicant can still implement the measures by scaling them up at alternative sites outside the partners' jurisdiction.

3.1.19. Human disturbance has been linked to increased stress response and reproductive failure in many seabird species. As such, the target species (kittiwake, guillemot, razorbill, puffin, and gannet) stand to benefit from measures aimed at reducing levels of disturbance, particularly at their breeding sites. Disturbance reduction can also benefit the wider ecosystem as well, allowing non-target species the opportunity to carry out their lifecycle without being disturbed.

3.1.20. Predation of seabirds by Invasive Non-Native Species (INNS) on islands is also a concern, and NTS have looked to the Applicant and Caledonia to support the development of a new predator control programme on their islands in the north of Scotland. This is a targeted approach aimed specifically at protecting NTS seabird islands from predation by INNS, but it has the potential to be scaled up to other, non-NTS islands elsewhere in Scotland where seabird colonies have been recorded. Similarly to the human disturbance measure, predator control can also benefit non-target species, such as storm petrel and Manx shearwater, which are also predated upon by INNS.

3.2. FISH ECOLOGY

3.2.1. As part of the Application, a Fish and Shellfish Ecology assessment was undertaken that determined there was the potential for LSE to arise on Buchan stock Atlantic herring (*Clupea harengus*). It was therefore decided that further mitigation measures may be necessary during the construction phase of the Proposed Development, to ensure there will be no LSE on spawning Buchan stock Atlantic herring.

3.2.2. Following submission of the EIAR, a formal consultation period was held, during which concerns were raised by key consultees, relating to the potential for impacts from the Proposed Development on both herring and sandeel receptors.

3.2.3. Chapter 5: Fish Ecology of the AIR further contextualises the potential impacts of the Proposed Development to North Sea herring and sandeel stocks, drawing on the information set out in the EIAR and the latest International Council for the Exploration of the Sea (ICES) stock assessments and guidance.

3.2.4. To quantify the potential effects on spawning stocks of herring and sandeel, the spawning potential (S(pot)) of each stock has been calculated. These outputs have been evaluated in relation to the latest ICES stock assessments and advice, and the mitigation measures proposed by the Applicant. This exercise has identified no potential for LSE on sandeel stocks, and the potential for LSE on herring stocks from underwater noise and increased suspended sediment concentration and deposition. These conclusions align with those made in the EIAR, and consequently the proposed mitigation measures for herring remain appropriate to ensure that the productivity of the North Sea herring stock is not affected by the Proposed Development.

3.2.5. Additional clarification regarding the classification of herring and sandeel sensitivities as defined in the EIAR, has also been provided. It is noted, that whilst NatureScot disagree with the sensitivity classifications, NatureScot agree with the overall significance of effect conclusions made in the EIAR.

3.3. COMMERCIAL FISHERIES

3.3.1. Chapter 6:Commercial Fisheries of the AIR provides clarification on the inclusion of certain fleet types in the assessment, confirms the significance of impacts including for the Proposed Development and cumulative effects, and sets out further details on the mitigation strategy, particularly the Fisheries Fund, Disruption Agreements, and the Obstacle Free Zone (OFZ).

3.3.2. It has been confirmed that the commercial fisheries assessment includes *Nephrops*-directed activity within the UK demersal otter trawl fleet. Inconsistencies identified by MD-SEDD have been clarified resulting in no overall changes made to the assessment findings.

3.3.3. It is confirmed that the residual significance of impacts on potting and hook gear is assessed as moderate adverse during construction (due to export cable installation), and minor adverse during operation, reflecting the expected resumption of activity within the Offshore Export Cable Corridor (ECC) (excluding areas of localised cable protection).

3.3.4. Disruption Agreements are proposed for the construction phase of the ECC, while a Fisheries Fund will support affected fleets operating within the array area through construction and the first five years of operation. The Fisheries Fund is intended to enable operational adaptation and broader support measures such as gear innovation, training, or research aligned with fleet needs.

3.3.5. Recent stakeholder feedback highlighted a notable increase in local haddock prices. Analysis of landing data from Peterhead and Fraserburgh confirms this trend, with prices rising sharply in late 2024 and early 2025. This increase occurred despite lower landing volumes, indicating strong market demand and underscores the continued commercial importance of haddock to the regional fleet and economy.

3.3.6. To mitigate impacts, an OFZ of 13 km^2 has been integrated into the array layout. While this does not fully offset displacement, it provides an opportunity to maintain continuing access and operational continuity within those parts of the development footprint identified as areas of relatively higher fishing activity and importance. A phased monitoring programme, conducted pre-, during, and post-construction, will validate EIA assumptions and inform updates to the Fisheries Management and Mitigation Strategy, with opportunity for refinements of mitigation to be implemented if monitoring indicates it is necessary.

3.3.7. Overall, the mitigation strategy is designed to be adaptive, evidence-led, and proportionate to the nature and scale of the predicted effects. It reflects the use of best available data, fleet engagement, and alignment with national marine policy objectives for sustainable development and coexistence with commercial fisheries.

3.4. REVISIONS FOLLOWING CONSULTEE INPUT

SOCIO-ECONOMICS COMMERCIAL FISHERIES UPDATE

3.4.1. This section of Chapter 7: Revisions Following Consultee Input of the AIR provides an updated socio-economic assessment of the significant commercial fisheries effects highlighted in the November 2024 EIAR submission. The worst-case scenarios for potential losses to the commercial fisheries sector and the wider economy have been revisited, and the potential for significant socio-economic outcomes re-assessed.

3.4.2. Volume 2, Chapter 17: Socio-economics, Tourism and Recreation of the EIAR concluded no significant effects with respect to socio-economics, tourism and recreation. The revised assessment shows that following full incorporation of the commercial fisheries effects

assessed in the EIAR, this conclusion remains the same. No significant socio-economic effects associated with commercial fisheries are anticipated.

MARINE MAMMAL REVISED ASSESSMENT

3.4.3. This section of Chapter 7: Revisions Following Consultee Input of the AIR was produced in response to the NatureScot comment relating to the density used in the quantitative assessment for bottlenose dolphins in the Greater North Sea (GNS) Management Unit (MU).

3.4.4. The Applicant acknowledges that the wrong SCANS III block density was presented in Table 7-5 in Appendix 12.1: Marine Mammals Baseline Technical Report of the EIAR. The consequence of this was that the GNS MU density value of 0.003 dolphins/km^2 was used in the quantitative assessment.

3.4.5. The assessment for bottlenose dolphins in the GNS MU has been revised using the SCANS III block densities as requested by NatureScot. The use of the SCANS III block densities results in substantially more bottlenose dolphins predicted to impacted per piling day at Muir Mhòr in the revised assessment compared to the assessment presented in Volume 2, Chapter 12: Marine Mammals of the EIAR.

3.4.6. The use of Interim Population Consequences of Disturbance Model (iPCoD) modelling has supported the conclusion that the magnitude of impact should increase from Low in Volume 2, Chapter 12: Marine Mammals of the EIAR to Medium in the revised assessment. This increases the significance of effect from Negligible in Volume 2, Chapter 12: Marine Mammals of the EIAR to Minor in the revised assessment, though neither is significant in EIA terms.

3.4.7. The revised cumulative assessment was undertaken using the SCANS III block densities for other projects rather than the uniform GNS density. The iPCoD modelling has shown that the impacted population is predicted to decline to ~94.7% of the unimpacted population size. The use of iPCoD modelling has supported the conclusion that the magnitude of impact should increase from 'Medium' in Volume 2, Chapter 12: Marine Mammals of the EIAR to 'High' in the revised assessment. The significance of effect for the cumulative assessment remains the same as it was in Volume 2, Chapter 12: Marine Mammals of the EIAR: Minor (significant in EIA terms).

3.4.8. Therefore, despite the change in the density estimate for bottlenose dolphins in the GNS MU, the assessment remains non-significant both for the project alone and cumulatively with other projects.

MUIR MHÒR
OFFSHORE WIND FARM

A joint venture between Fred. Olsen Seawind & Vattenfall

Muir Mhòr Offshore Wind Farm Ltd
120 Bath Street,
Glasgow,
G2 2EN
muirmhor.co.uk