

Aberdeen Airport

From: [Redacted]
To: [MD Marine Renewables](#)
Subject: Re: 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 3 March 2026
Date: 16 February 2026 14:18:22
Attachments: [image003.png](#)
[image309788.png](#)
[image735621.png](#)
[image867318.png](#)
[image622988.png](#)
[image323574.png](#)

This proposal is located outwith our consultation zone. As such we have no comment to make and need not be consulted further.

Kind regards
Kirsteen



Kirsteen Macdonald
Safeguarding Manager
Glasgow Airport

 M [Redacted]
 [Redacted]
 www.agsairports.co.uk

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

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Aberdeen City Council

From: [EPConsultations](#)
To: [MD Marine Renewables](#)
Subject: RE: 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 3 March 2026
Date: 05 February 2026 09:49:44
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image001.png](#)

Thank you for consulting us. We have no comments on this application.

Kind regards
Sue

	<p>Sue Cumming (She/Her) BSc (Hons) MSc MCIEEM Senior Environmental Planner (Biodiversity & Open Space) Strategic Place Planning City Regeneration & Environment Aberdeen City Council Ground Floor North Marischal College Broad Street Aberdeen AB10 1AB</p> <p>Teams Telephony: 01224 069399</p> <p>Email: [Redacted] www.aberdeencity.gov.uk X: @AberdeenCC Facebook.com/AberdeenCC</p>
<p>Please note I work part time and have Thursdays as a non working day. ** You may receive emails from me outside of normal working hours. Please do not feel any pressure to respond outside of your own work schedule **</p> <p><i>Protecting the irreplaceable. Promoting the sustainable.</i></p>	



I've signed the Aberdeen Climate Pledge



Planning Authority of the Year: Aberdeen City Council

Best Plan: [Net Zero Aberdeen Routemap](#)

Aberdeenshire Council

Our Ref: ENQ/2026/0083

Ask for: Stephanie McMillan
Tel: 01467 468676
Email: [Redacted]

Scottish Government Marine Directorate
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

6 March 2026

Dear Sir/Madam

Marine Licence Consultation for Construction and Operation of the MarramWind Offshore Wind Farm at MarramWind Offshore Wind Farm, 75 And 110 Kilometres off the North-East Coast of Scotland

Thank you for your consultation request in relation to the above proposal.

Having consulted with internal consultees with an interest in this development I can provide the following comments at this time. Please note these are restricted to the intertidal zone, where this application overlaps with the onshore element of the project.

Natural Heritage

Intertidal Ecology

The habitats within the intertidal area of the landfall options were predominantly sandy beaches with areas of rock. Fauna and flora present were representative of these habitats, and no species of conservation importance were recorded during the survey.

The cables from the offshore windfarm are to be brought ashore using horizontal directional drilling (HDD) therefore there will not be any direct disturbance of the intertidal zone although the associated works could result in a temporary increase in suspended sediment and deposition, mobilisation of sediment associated contaminants and increased risk of introduction and spread of contaminants.

It has been concluded that although the intertidal habitats and species are assessed as being of medium sensitivity to activity, the magnitude of the effect is low to negligible therefore the effect is concluded to be Minor Adverse (Not Significant) or Negligible in terms of EIA. This conclusion is accepted.

A range of embedded mitigation measures have been adopted to reduce the potential for adverse impacts on offshore and intertidal ecology, including measures considered to be good or standard practice as well as actions to meet legislation requirements. Measures proposed include the use of HDD, the preparation of an Environmental Management Plan, including a Marine Pollution Contingency Plan, a Scour Protection Plan, a Project Environmental Monitoring Plan, and a Construction Method Statement.

Intertidal Ornithology

The cables from the offshore windfarm are to be brought ashore using trenchless installation such as horizontal directional drilling (HDD) therefore there will not be any direct disturbance of the intertidal zone. There may be some disturbance of birds within the intertidal area from vessels associated with the cable installation, as well as vehicles and personnel associated with the onshore element, however, it is considered that this would be temporary during construction with recovery from disturbance likely to occur rapidly once the works are complete.

It has been concluded that although the bird species recorded within the intertidal area of medium to high sensitivity to disturbance, the magnitude of the effect is very low i.e. localised disturbance or temporary loss of habitat. The long-term viability of these species are not threatened as a result of the development therefore the effect is concluded to be Minor Adverse (Not Significant) in terms of EIA. This conclusion is accepted.

A range of embedded mitigation measures have been adopted to reduce the potential for adverse impacts on offshore and intertidal ornithology, including measures considered to be good or standard practice as well as actions to meet legislation requirements. Measures proposed include the use of HDD, the preparation of an Environmental Management Plan, including a Marine Pollution Contingency Plan, a Project Environmental Monitoring plan, a Construction Method Statement and a Lighting Plan.

Core Paths/Rights of Way

The presence of core paths has been acknowledged within the “Traffic and Transport” chapter of the Onshore EIAR, which has also been submitted in support of the Marine License application.

The impact of the development on core paths and rights of way has been assessed within an Outline Core Path Management Plan. While this does not appear to be available as part of this Marine Licence application it is probably more appropriate for it to be assessed as part of the planning application for the onshore elements of this development.

Part of the coastal path utilises the beaches in the area of the proposed landfall and access will be taken within the intertidal area, depending on tides. The use of Horizontal Directional Drilling to bring the cabling ashore means that there should not be any direct impact upon the coastal path. Other than noting this, there are no further comments on the impacts on public access in relation to the Marine Licence

Archaeology

Have no concerns with the proposal subject to the following conditions and informatives

Programme of archaeological works

i) No development shall commence unless an archaeological Written Scheme of Investigation (WSI) for a Programme of Archaeological Works has been submitted to, and approved in writing by, the planning authority. The WSI shall include details of how the recording and recovery of archaeological resources found within the application site will be undertaken, and how any required updates to the WSI will be provided throughout the implementation of the programme of archaeological works. The WSI will also detail how any requirement for reporting, post-excavation analysis, archive deposition, publication of results, and the delivery of public benefit (including how this will be recorded and reported) will be undertaken.

ii) A Programme of Archaeological Works must be carried out in accordance with the approved WSI, and any addendums to it, as agreed under point (i) unless otherwise agreed in writing with the Planning Authority.

iii) Should the archaeological works carried out under point (ii) reveal the need for post excavation analysis, the development hereby approved shall not be occupied or be brought into use unless a Post-Excavation Research Design (PERD) for the analysis, publication and dissemination of results, including additional public engagement and archive deposition, has been secured by the developer and submitted to, and approved in writing by, the planning authority.

Reason: To safeguard and record the archaeological potential of the area, and to accord with NPF4 Policy 7 and Historic Environment Policy for Scotland.

The programme of works is yet to be finalised, and we note a draft WSI has been provided outlining the proposed offshore mitigation which we're happy with. All works are to be undertaken by a suitably qualified, ClfA-compliant, archaeological contractor. Given the scale of development, public benefit opportunities should be included as part of the works (as per the informative below).

Informatives:

Works by archaeological organisation

A suitably qualified archaeological organisation must undertake any Non-invasive Archaeological Survey, Archaeological Building Recording or Programme of Archaeological Works required by a condition attached to this planning permission.

Delivery of Public Benefit

Archaeological mitigation provides an opportunity for the delivery of public benefit. Community engagement can enhance public understanding of, and support for, the historic environment, adding value to both the conditioned archaeological work being undertaken as well as to the

development itself. Identifying appropriate community stakeholders (e.g. local schools, heritage groups, community hubs, employability schemes), and undertaking consultation and engagement with them to inform the approach to engagement, should be undertaken early and in advance of the commencement of the programme of archaeological works to ensure that appropriate engagement activities and deliverables can be incorporated effectively.

Potential public benefit opportunities should be outlined in the Written Scheme of Investigation (WSI) and be based on ALGAO Scotland's Delivery of Public Benefit and Social Value Guidance for Archaeology in the Planning Process (2023). The WSI should include how these benefits might be achieved by means of engagement, participation and/or dissemination of the results both during and after the project, as appropriate to the scale, nature, and circumstances of the work. This may vary from a brief social media post for a smaller project to a full-scale community project for larger scale, more complex sites. Delivery of these public benefits, with further expansion or reduction of engagement activities to be undertaken depending on the results of the mitigation, will be further explored at both the Data Structure Report (DSR) stage (within its 'Recommendations'), and, if required, at the Post-Excavation Research Design (PERD) stage of the archaeological mitigation process.

Post-Excavation Research Design (PERD)

A Post-Excavation Research Design (PERD) is a written specification for the post-excavation analysis of artefacts and samples recovered during the excavation phase of archaeological works, prepared by the appointed Chartered Institute for Archaeologists (CIfA) member archaeological contractor on behalf of the applicant. It should include a project design for the post-excavation work, a costed assessment for this work, costed proposals for the publication of results and archive deposition. It should also consider and, as appropriate, outline the delivery of public benefit opportunities. The PERD must be submitted to the planning authority for approval. Once the PERD has been accepted, written confirmation must be provided to the planning authority demonstrating that an agreement is in place between the applicant and the appointed CIfA member archaeological contractor, committing the applicant to fund the post-excavation work and for said work to be completed by an agreed date.

Subject to the above, Aberdeenshire Council offer no objection to this proposal contained within the provided consultation. Do not hesitate to contact me should you wish to discuss and matters further.

Yours faithfully

[Redacted]

Paul Macari

Head of Planning and Economy

BT Group

From: radionetworkprotection@bt.com
To: MD Marine Renewables
Cc: [Redacted] ; radionetworkprotection@bt.com
Subject: RE: WID14182 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 3 March 2026
Date: 04 February 2026 14:30:29
Attachments: [image004.png](#)
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[image001.png](#)

General



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-

OUR REF: WID14182

Thank you for your email dated 19/01/26.

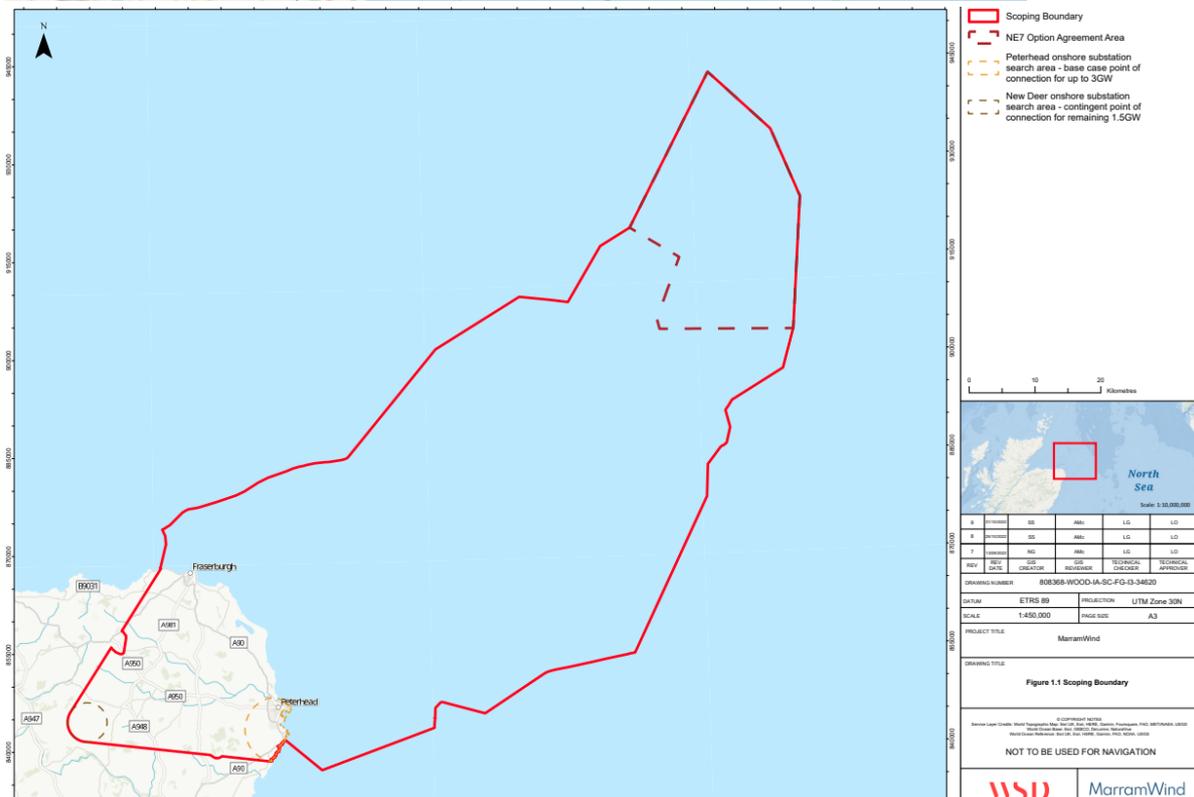
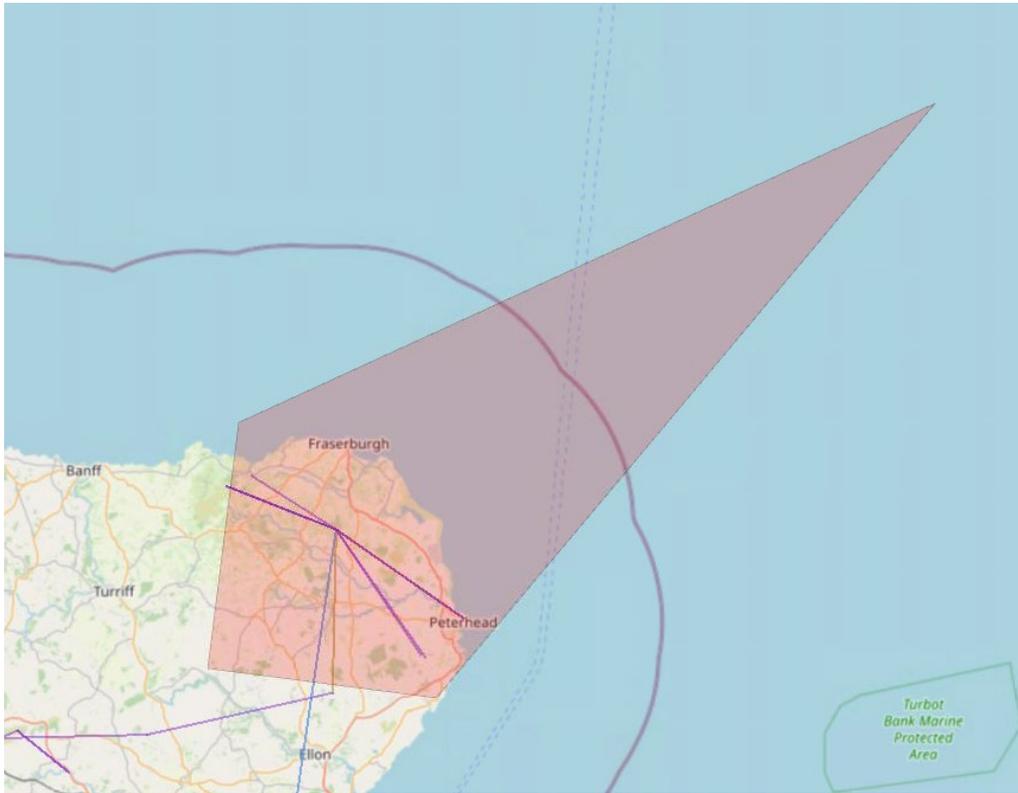
We have studied this proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that, the project indicated *could* cause interference to BT's current and presently planned radio network. We will require co-ordinates and heights of any structures at height that are in the onshore boundary to be able to make a decision.

BT requires 100m minimum clearance from any structure at height to the radio link path. It should be noted that this decision is for the date of its issue, includes no micro-siting, as the use of the spectrum is dynamic and can change on an ongoing basis. Therefore, please reconsult us if there are any changes during the planning process with heights and locations of any structures, and its finalisation, as we may have new links assigned by Ofcom over its duration.

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



Kind Regards

Lisa Smith
 National Radio Planner
 Radio & Satellite Platforms



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Cenos Offshore Windfarm Ltd &
Green Volt Offshore Windfarm Ltd
(Flotation Energy Ltd & Vårgrønn AS)

By email

12 March 2026

Our reference: CEN001-FLO-CON-CAG-LET-0022

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

00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – 75 and 110 kilometres off the North-East coast of Scotland

Thank you for consulting Green Volt Offshore Windfarm Ltd (Green Volt) and Cenos Offshore Windfarm Ltd (Cenos) on the section 36 consent, marine licence applications, Environmental Impact Assessment Report (EIAR) and supporting documentation for MarramWind Offshore Windfarm (MarramWind), submitted to the Scottish Ministers on 19 January 2026. MarramWind will be located in the North Sea, off the northeast coast of Scotland, between 75 and 110 kilometres (km) from the Aberdeenshire coast.

As Green Volt and Cenos are both being developed under the Joint Venture formed by Flotation Energy Ltd (Flotation Energy) and Vårgrønn AS (Vårgrønn), **a joint response has been prepared**. Flotation Energy is an offshore wind development company, headquartered in Edinburgh, UK. Founded in 2018, the company is pioneering the deployment of both floating and fixed offshore wind in Scotland, the UK and internationally. Vårgrønn is a dynamic offshore wind company based in Norway, dedicated to powering the energy transition through the development, construction, operation, and ownership of offshore wind projects and related infrastructure. Vårgrønn is a joint venture between Plenitude, an Eni-controlled company, and Norwegian energy investor HitecVision.

Green Volt was granted consent (section 36 and marine licences) by the Scottish Ministers on 19 April 2024 as well as planning permission by the Aberdeenshire Council for onshore activities on 21 March 2024. Cenos submitted its Scoping Report for offshore activities in April 2024 and its HRA Screening Report in May 2024 and received a Scoping Opinion from Scottish Ministers on 10 September 2024. The Cenos EIAR was submitted to Scottish Ministers in January 2025 and consultation for this application remains open at the time of writing. The proposed consenting boundary for MarramWind's array area is located approximately 9 km from Green Volt's array area and the proposed export cable corridor overlaps with the consented Green Volt transmission to landfall export cable corridor. The proposed consenting boundary for MarramWind's array area is 140 km from the Cenos array area, and the export cable corridor overlaps with the Cenos export cable corridor near the landfall.

Green Volt Offshore Windfarm Ltd (company number: SC698787), Cenos Offshore Windfarm Ltd (company number: SC718432), C/O CMS Cameron Mckenna Nabarro Olswang LLP, 4th Floor, Saltire Court, 20 Castle Terrace, Edinburgh, EH1 2EN. www.greenvoltoffshorewind.com. www.cenosoffshorewind.com.

Cenos response

Cenos notes the information presented within the MarramWind EIA, RIAA, application supporting documents and associated marine licence applications in relation to potential project–project interactions and acknowledges that the respective export cable corridors intersect in proximity to the proposed landfall area. Cenos is content that these updates reflect the current understanding of potential interactions between the projects.

Cenos considers that, with appropriate coordination, the projects can co-exist without giving rise to significant adverse cumulative or in-combination effects. Cenos is committed to continued engagement with MarramWind to support coordinated design development, consenting assumptions and construction planning.

In particular, ongoing engagement may be required in relation to:

- export cable routing and detailed cable crossing design;
- construction, maintenance and offshore survey phasing and timing, including the management of potential SIMOPS; and
- installation methodologies and access arrangements at landfall.

Cenos welcomes dialogue with MarramWind and relevant stakeholders as both projects progress through the EIA, consenting and detailed design stages, to minimise potential conflicts and ensure effective use of the offshore environment.

Green Volt response

Green Volt note that the MarramWind windfarm site is located approximately 9 km north of the Green Volt windfarm site and the proposed MarramWind export cable corridor partially overlaps with the consented Green Volt export cable corridor, with both corridors intersecting at the landfall.

MarramWind are part of the Peterhead Developers Forum, a collaborative group of offshore wind developers, including Green Volt and other projects, established to identify and manage potential project interactions across the region such as cable crossings, landfall access and potential constraints during construction and operation and maintenance activities. Green Volt encourages MarramWind to continue engaging through this forum to ensure interactions between the two projects are appropriately managed and potential impacts mitigated. On page 76 of Chapter 4 Project Description of the MarramWind Offshore EIA report, it is noted that the MarramWind project construction would commence in 2030. By this time Green Volt is expected to be operational and therefore MarramWind would need to consider impacts of project construction activities on the Green Volt operational activities, as well as interactions with the Green Volt export cable route. Green Volt welcomes ongoing dialogue with MarramWind in relation to these matters.

Green Volt are content that the cumulative effect assessment has considered the Green Volt project.

Yours sincerely

[Redacted]

Adam Payne

For and on behalf of Green Volt Offshore Windfarm Ltd and Cenos Offshore Windfarm Ltd

Head of Consent, Flotation Energy

[Redacted]

**Department of Agriculture,
Environment and Rural Affairs
("DAERA")**

00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 3 March 2026

Marine Conservation

Marine Conservation welcomes the opportunity to comment on this consultation. We note that we were not consulted at earlier stages of the process, but we offer the following observations.

Given the nature of the proposal, several MPAs in Northern Ireland designated for seabird species with extensive foraging ranges should be included in future assessments. Indicative maximum foraging ranges include:

- Fulmar: ~542 km
- Great Skua: ~443 km
- Manx Shearwater: ~1,346 km
- Northern Gannet: ~315 km

We also wish to highlight that the HRA screening report concludes that Manx Shearwater presents no Likely Significant Effect (LSE) due to low numbers recorded across 24 months of digital aerial surveys. However, this evidence alone is not sufficient to rule out potential in-combination effects with other existing or proposed projects in the wider area. The possibility of displacement remains, and this species' extensive foraging range increases the likelihood that individuals may move through or utilise the area more frequently than surveys suggest. Therefore, it cannot be stated with certainty that there is no risk of LSE to Manx Shearwater.

Marine Licensing

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. 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
6th March 2026

Dear MD Team,

MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications – Consultation Response Request

On behalf of the Dee District Salmon Fishery Board (Dee DSFB) we welcome the opportunity to respond to the MarramWind Offshore Wind Farm Limited - Consultation Request for the EIA.

Designations & Conservation Status - Atlantic Salmon

As a statutory body charged with the protection of Atlantic salmon and sea trout stocks within its district, the Dee DSFB has a duty to ensure that there are no significant adverse impacts upon the populations of these species.

The Dee has been designated as a Special Area of Conservation under the EC Habitats Directive 92/43 EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna for Atlantic salmon (the principal species for which it receives this designation).

The International Union for Conservation of Nature's (IUCN) latest Red List of Threatened Species (December 2023) reclassified Atlantic salmon from 'Least Concern' to 'Endangered' in Great Britain because of a 30-50% decline in British populations since 2006 and 50-80% projected between 2010-2025. The Scottish Government has released a Scottish Wild Salmon Strategy which calls on government agencies, as well as the private sector, to prioritise the protection and recovery of Scotland's wild Atlantic salmon populations.

Salmon and many other key species of diadromous fish have also been identified as Priority Marine Features and UKBAP Priority Species.

Designations & Conservation Status - Other Species

The Dee District also supports populations of trout, eels and brook, river and sea lampreys.

Sea trout, common to all the rivers within the Dee District, are a priority species under the United Kingdom's Biodiversity Action Plan (UKBAP).

All lamprey species are protected under the EC Habitats Directive whilst river and sea lampreys are additionally protected under the UKBAP priority list.

Eels are a UKBAP priority species, critically endangered under the IUCN red list and protected under CITES.

Comments

The Dee DSFB welcomes the opportunity to respond to the EIA. In general we find it difficult to comment on the approaches and findings outlined in the EIA in relation to Atlantic salmon due to lack of robust scientific research, a key requirement to fully understand potential interactions.

We would request that where evidence of negative impact on a protected species is inconclusive and impacts of development are uncertain, reasonable efforts should be made to fill evidence gaps and decision makers should apply precaution within an overall risk-based approach. The following comments are provided, and we would also draw attention to Fishery Management Scotland's response to the 'Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition' and highlight our previous comments from March 2023 in respect of the MarramWind Offshore Wind Farm Limited – MarramWind Offshore Wind Farm – Scotwind NE7 Site - Consultation on Request for Scoping Opinion.

1. For diadromous fish, there is a lack of current information on their use of the marine environment, and an apparent lack of ambition and resource to study and understand the potential impacts of developments on diadromous fish.
2. We remain keen to work constructively with the developers, Marine Directorate and NatureScot to identify appropriate monitoring and research programmes which will allow us to be able to assess the acknowledged risks of proposed marine developments in a more appropriate manner. There is a clear and urgent need to fund, plan and start strategic research on the movement, abundance, swimming depth, feeding behaviour and impact pathways relevant to diadromous fish. Such research would clearly feed into the potential mitigation measures that might be deemed appropriate, and the conditions under which such mitigation should be enacted. Given the scale of development in the North Sea, developers should be required to work together to fund strategic monitoring, to allow more certainty for all involved.

The scale of proposed offshore developments and other technical approaches to marine renewables development represents a step-change in the exposure of marine animals of high cultural and economic significance to attendant risks. As highlighted above, understanding of many of these risks is insufficient to support proposals for mitigation even at the stage when substantial developments are being submitted for licensing. The cumulative impact of such proposals, alongside those developments already submitted or likely to follow in the near future is potentially even greater. We believe that more needs to be done to ensure that the best

scientific talent is made available to find practicable ways to address the unresolved uncertainties.

3. We would request that the developer contributes to monitoring which could address evidence gaps identified the ScotMER Fish Specialist Receptor Group evidence map. With reference to DF.01-2022: Spatial and Temporal Distribution, DF.02-2022: Survival and progression rates in relation to passing through marine renewable areas, DF.03-2022 Influence on migratory patterns due to cable deployment (EMF), DF.04-2022: Effects on diadromous fish behaviour including fish aggregations around devices (ecological traps) and DF.05-2022: Impacts of noise, including particle motion and direct impact high intensity sound from pile driving and detonation of unexploded ordnance. Potentially causing both direct physical impact and displacement e.g. less foraging more predation.
4. A more widespread body of scientific research and its effective incorporation into environmental decision-making is required to achieve the dual objectives of marine development and ensuring that human impact on the marine environment is managed to protect and enhance important marine ecosystems and species. The Dee DSFB would recommend that further robust scientific research into salmonid migration and potential stressors within the marine environment is undertaken to protect this species, which is ecologically, culturally and economically important to Scotland.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

[Redacted]

Edwin third

River Operations Manager, Dee District Salmon Fishery Board

Hywind Scotland

From: [Redacted]
To: [MD Marine Renewables](#)
Cc: [Redacted]
Subject: RE: 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 6 March 2026
Date: 11 February 2026 11:39:13
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image003.png](#)

Dear MD-LOT Marine Renewables Team,

The Hywind Scotland project noticed that the red line boundary overlaps with our current export cable corridor, therefore we would like to be kept informed of further developments with an opportunity to comment in future.

Best regards,

Marta

Marta Kucharska

Offshore environmental specialist

REN EUR RD

[Equinor Polska sp. z o.o.](#)

+ [Redacted]

[Redacted]

Visitor address: Aleja Grunwaldzka 472C, 80-309 Gdansk
Marszałkowska 107, 00-110 Warszawa

www.equinor.com



 Please consider the environment before printing this email

Fisheries Management Scotland (“FMS”)



T: +44 (0)131 221 6567

[Redacted]

Licensing Operations Team
Marine Directorate
By e-mail

13 March 2026

Dear Sir/Madam

**00011544, 00011545, 00011546 & 00011547 - MarramWind Offshore Wind Farm – EIA
Section 36 consent and Marine Licence Applications**

Fisheries Management Scotland is the representative body for Scotland's District Salmon Fishery Boards, the River Tweed Commission and charitable Rivers and Fisheries Trusts. Our members work to conserve Scotland's valuable and iconic wild salmon and freshwater fish and fisheries and the aquatic environment on which they depend.

Offshore renewable energy has an important role to play if the Scottish Government are to meet their commitment for Scotland to reach net-zero emissions of all greenhouse gases by 2045. However, there remain a number of outstanding questions and concerns about the potential negative effects on diadromous fish, including Atlantic salmon and sea trout.

District Salmon Fishery Boards have a statutory duty to protect and improve salmon and sea trout fisheries. In assessing marine renewable energy developments (wind, wave or tidal), it is important that DSFBs and Fisheries Trusts, can be assured that all potential negative impacts have been assessed in full, and mitigations put in place. Where uncertainty remains, the developer should be required to contribute to research which will help fill these evidence gaps, as a condition of their operational consent. In addition, and in the light of the nature crisis, we believe that all developers should contribute to projects designed to conserve and restore important habitat at a catchment scale.

Across Scotland, wild salmon populations are in crisis, and face a range of pressures, some of which are under human control. The Scottish Government have published a [wild salmon](#)

[strategy](#) and [implementation plan](#), which sets out the actions to be taken over a five year period to 2028. The implementation plan includes a number of actions under the heading of “understanding and mitigating pressures in the marine and coastal environment”.

Where salmon populations are below their conservation limits, any additional pressure, including from marine renewables, cannot be considered sustainable. Scottish salmon rivers are categorised by the Scottish Government under The Conservation of Salmon (Scotland) Regulations 2016, according to the likelihood of them meeting their conservation limits. The most recent river gradings have been [published for 2026](#). There are now 115 rivers across Scotland graded as Category 3, meaning there is a less than 60% probability of meeting their conservation limit.

It is now well-recognised that populations of Atlantic salmon have rapidly deteriorated across their native range. In the latest species reassessment by the [IUCN Red List](#) of Threatened Species, released in December 2023, Atlantic salmon have been reclassified from ‘Least Concern’ to ‘Endangered’ in Great Britain (as a result of a 30-50% decline in British populations since 2006 and 50-80% projected between 2010-2025), and from ‘Least Concern’ to ‘Near Threatened’ in terms of global populations (as a result of global populations declines of 23% since 2006).

We note, and support, the recent position that the Marine Directorate have taken - “*MSS do not consider it appropriate for an EIA/HRA to conclude there is no or negligible impact just because no evidence exists of the impact. MSS advise that impacts to diadromous fish must be adequately investigated, rather than relying on a lack of evidence to claim there is no impact*”.

There is considerable uncertainty around the potential for impacts of offshore wind farms on Atlantic salmon, with limited evidence to support claims of lack of impacts. Given the significant decline in wild Atlantic salmon populations in recent years we are strongly of the view that a precautionary approach in assessments is required. Such an approach should take into account both the interactions of migratory fish with the project site, but also with the proposed cabling routes and landfall. Assessments of impacts on migratory fish species should also consider cumulative impacts, not only at sea, but also any impacts associated with terrestrial infrastructure, energy transmission and with particular emphasis on associated river crossings for cables.

Under Scottish Marine Energy Research (ScotMER), the [Diadromous Fish Receptor Group](#) has identified evidence gaps related to the health, distribution, and impacts on Diadromous fish (salmon, sea trout, etc.). Scottish Government has published an ‘evidence map’ (available for download at the above link) which identifies and scores these evidence gaps according to a specific prioritisation process. It is important that each of these evidence

gaps is considered in full by the applicant, and developers should *contribute* to filling these evidence gaps as a **specific condition of consent**.

Following recent engagement with members of Fisheries Management Scotland we highlight in particular, the following priorities identified through ScotMER:

- DF.01-2022: Spatial and Temporal Distribution
- DF.04-2022: Effects on diadromous fish behaviour including fish aggregations around devices (ecological traps)
- DF.02-2022: Survival and progression rates in relation to passing through marine renewable areas
- DF.03-2022: Influence on migratory patterns due to cable deployment (EMF)

Fisheries Management Scotland did not have capacity to respond at earlier stages of the planning process for this development, but as noted in Chapter 13, we did supply pre-application information. The Dee DSFB requested further consultation with Marine Scotland Science and FMS, specifically in relation to the ScotMER Diadromous Fish Specialist Receptor Group. Unfortunately, this further engagement did not take place and we are disappointed that a significant evidence gap identified by the above process does not appear to have been considered by the developer. New structures in the marine environment have the potential to act as ecological traps, or to aggregate predators. We are strongly of the view that significant numbers of post smolt salmon are likely to migrate in the vicinity of the proposed development. This includes post smolts from east coast rivers, but also from rivers draining into the southern Moray Firth.

We recognise that predation impacts relating to aggregation of predatory fish or marine mammals are challenging to assess and manage at the development site, but we would like to see recognition of this potential impact and funding for appropriate mitigation measures should the developed be consented. In particular, we would draw the attention of MD-LOT and the developer to recent work by the Sea Mammal Research Unit to test a 'detect and deter' system designed to prevent seals from entering rivers to predate on salmonids, most recently on the River Dee. We consider that investment in such systems, and associated infrastructure, by the developer, would be a potential means of mitigating predation impacts on salmonids and we would welcome further discussion on this point.

We would emphasise that to date, and as detailed above, there remains considerable uncertainty around evidence of impacts on salmon and other diadromous species. We therefore expect to see proposals for strategic research **and** mitigation. In the case of mitigation, this should be focussed, in line with international advice via NASCO, on projects which improve freshwater conditions and increase the number of healthy wild salmon and sea trout smolts leaving Scotland's rivers.

We note, and welcome, the consideration of terrestrial infrastructure with regard to salmonids in Chapter 23. We note the stated lack of research on the impacts of EMF from cabling buried under watercourses, and the statement that "it is difficult to completely rule out the possibility of an impact, particularly as fish are likely to be exposed for longer periods of time while within a watercourse in comparison to individuals passing over a subsea cable during migration". We believe that this is an important issue and consideration should be given to designing and funding a research project to investigate this further. The concerns of the Ugie DSFB relate to a potential for cumulative impacts arising from cable crossing from multiple landfall sites, including the proposed development. It would therefore seem reasonable for developers to come together to design a study to demonstrate the lack of impact suggested in the EIA report. FMS would be happy to engage with developers on such a project.

In addition to EMFs, should the development be consented, we would welcome further engagement with FMS and relevant members on the following points:

- Appropriate buffer zones to protect burns/ rivers from the project infrastructure. Any buffer zone should also apply to the construction corridor associated with the infrastructure – vehicle movements, exposed soil etc. should be avoided within this buffer zone.
- Culverts (if any) associated with stream crossings should be installed flush with the stream bed to ensure continuity of substrate movement and fish migration. We would emphasise that small streams require particular attention, and many of the issues that we have identified in the past have been associated with small water courses. SEPA guidance¹ should be followed, but the developer should also be aware that there are a number of specific offences included within the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2023, which relate to the protection of young salmon and spawning beds and obstructing the passage of fish. These require to be considered in full. Early and meaningful engagement with relevant DSFBs about these provisions is strongly recommended.
- We would expect to see a species protection plan for salmon and sea trout.
- We would like to see regular and meaningful engagement with DSFBs and Trusts throughout the pre-construction and construction phase. The costs of our members time should be met by the project.
- Our members have considerable experience of dealing with infrastructure projects and unfortunately, we have had to address environmental impacts when things go wrong. With that in mind, we don't consider that General Environmental Management Plans are sufficient, in isolation, to avoid pollution of water courses. Therefore, the

¹ <https://www.sepa.org.uk/media/151036/wat-sg-25.pdf>

Environmental Clerk of Works should regularly engage with DSFB and Trust staff to ensure that any activities which risk harm to the water environment are appropriately designed, managed and mitigated, in particular with regard to tracks, drainage and other infrastructure.

- Baseline environmental data (electrofishing, invertebrates (including freshwater pearl mussels), and a full audit of any Invasive Non-Native Species (INNS)) should be completed, written up in an easily accessible manner and used to develop a shared understanding with DSFBs and Trusts of any environmental impacts arising from the work.
- The results from these baseline surveys should guide the construction method statements used by the developer and any mitigation required (e.g. timing of work, periods of works restriction to avoid spawning and emergence of fry, mitigation to prevent further spread of INNS etc.). Advice should be sought from the appropriate DSFB and Trust in advance of construction starting. Again, the costs of our members time should be met by the project.
- Pollution prevention measures should be discussed with DSFBs, and we expect these to be adhered to at all times, through good site management and recruitment of sub-contractors with a proven track record of delivering sound environmental management. Live sedimentation and pollution monitoring should be put in place to assess any impacts of construction work and allow a swift response to incidents if they occur. This is particularly important for burns with salmonid populations or where there are freshwater pearl mussels downstream.
- If additional surveys or fish rescues are required (as set out in section 8.4.33) members of Fisheries Management Scotland are highly competent and possess extensive local knowledge of the river catchments in question. They should be contracted to undertake any such work.
- If any of the construction work will prevent angling from occurring, recompense for any annoyance should be included. Close liaison on this matter with relevant DSFBs and Trusts will be vital, recognising that fishing is often let several months in advance, and is often associated with local accommodation and other services.
- We are strongly of the view that the proposed development should offer significant biodiversity enhancements within a reasonable timescale and with reasonable certainty as required by National Planning Framework 4. Such enhancements should be relevant to our efforts to restore rivers and key fish populations and engagement with DSFBs and Trusts should be an integral part of designing such significant biodiversity enhancements. Fisheries Management Scotland would be happy to facilitate engagement on this important issue, and on any of the issues identified above.

Conclusion

It should be emphasised that we have no wish to prevent or delay any proposed development unnecessarily and we remain keen to work constructively with the developers and the Marine Directorate to identify appropriate monitoring programmes which will allow us to be able to assess the acknowledged risks of this development, and other proposed developments in a more appropriate manner. There is a clear and urgent need to fund, plan and start strategic research on the movement, abundance, swimming depth, feeding behaviour and impact pathways relevant to diadromous fish. Developers should be required to work together, as a condition of consent, to fund strategic monitoring relating to diadromous fish, in order to allow more certainty for all involved.

Yours faithfully,
[Redacted]

Alan Wells

CEO, Fisheries Management Scotland

Historic Environment Scotland (“HES”)



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By email to:

MD.MarineRenewables@gov.scot

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

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300062420

28 January 2026

Dear Marine Directorate

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

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 Marram Wind Offshore Windfarm - section 36 and Marine Licence consent for floating windfarm

Thank you for your consultation on these Environmental Impact Assessment (EIA) Report, S36 and Marine Licence applications, which we received on 19 January 2026. We have reviewed the 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 local authority 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.

Our advice

From 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.

We have considered the information received and do not have any comments to make on the offshore elements of the proposals. We will respond separately to consultation from the planning authority about onshore elements of the 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.

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

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



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Further information

Decisions that affect the historic environment should take the [Historic Environment Policy for Scotland](#) (HEPS) into account as a material consideration. HEPS is supported by our [Managing Change guidance series](#).

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox, hmconsultations@hes.scot. If you have questions about this response, please contact Mary MacLeod Rivett at [Redacted]

Yours sincerely

Historic Environment Scotland

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

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**



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Annex

Heading

Subheading

Heading

Subheading

Heading

Subheading

Historic Environment Scotland
26 January 2026

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

Scottish Charity No. **SC045925**

VAT No. **GB 221 8680 15**

JNCC

From: [JNCC Offshore Industries Advice](#)
To: [MD Marine Renewables](#)
Cc: [Redacted] ; [JNCC Offshore Industries Advice](#)
Subject: RE: 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – EIA Section 36 and Marine Licence
Date: 23 January 2026 14:47:02
Attachments: [image002.png](#)
[image004.png](#)
[image005.png](#)

Good Afternoon Jennifer,

Thank you for consulting JNCC on the MarramWind Offshore Windfarm.

NatureScot is now authorised to exercise the JNCC's functions as a statutory consultee in respect of certain applications for offshore and offshore waters (0-200nm) adjacent to Scotland.

We have reviewed the operations and this would fall under that delegation, therefore NatureScot should provide a full response.

NatureScot will contact JNCC directly if they require any input where this is required.

Have a nice weekend.

Kind regards,

Jon Connon

Offshore Industries Advice Officer

Marine Management Team

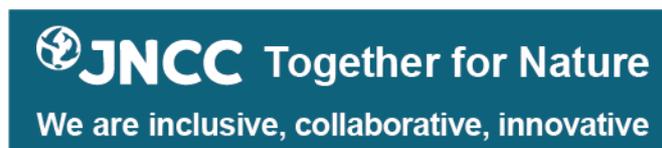
JNCC, Inverdee House, Baxter Street, Aberdeen, AB11 9QA

Tel: 01224 083522

Working pattern: Monday to Friday

[Website](#) [Twitter](#) [Facebook](#) [LinkedIn](#)

[Sign up to the JNCC Nature News monthly newsletter](#)



Joint Radio Company Ltd ("JRC")

From: [Joint Radio Company](#)
To: [MD Marine Renewables](#)
Cc: [Redacted]
Subject: Re: RE: 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 6 March 2026
Date: 12 March 2026 15:40:31

Good Afternoon,

Apologies the objection earlier was sent in error this site was cleared last year and is still OK, see below for details:

If any details of this proposal change, particularly the disposition or scale of any turbine(s), this clearance will be void and re-evaluation of the proposal will be necessary.

Dear Sir/Madam,

Name/Location: MarramWind Onshore substation

Max Substation Heights:

	Level platform height AoDm	Foundation & plinth height (m)	Maximum substation building height (m)	Approximate substation elevation AoDm
Scenario 1a				
Substation Phase 1 block	48.37	0.75	17.50	66.62
Substation Phase 2 block	46.98	0.75	17.50	65.23
Substation Phase 3 block	52.82	0.75	30.00	83.57

Lighting mast extending to 32m

Substation Phase Corners (worst case scenario) at NGR:

North East Platform (Phase 1 AC – Scenario 1a)

Centre: NK0841546203
NW: NK0835646304
NE: NK0850846274
SW: NK0832246133
SE: NK0847446102

North West Platform (Phase 2 AC – Scenario 1a)

Centre: NK0817346221
NW: NK0809646366
NE: NK0830546317
SW: NK0804046124
SE: NK0824946076

South Platform (Phase 3 DC – Scenario 1a)

Centre: NK0822445913

NW: NK0812446069

NE: NK0838246010

SW: NK0806645815

SE: NK0832445756

This proposal is cleared - for this scenario and its specific coordinates only - with respect to radio link infrastructure operated by the local energy networks.

If any of the substation phases are moved in the future away from / beyond the coordinates provided, this clearance will not be valid and will require reanalysis for its impact on the radio link infrastructure operated by the local energy networks.

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom

Office: 02476 932 185

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

[About The JRC | Joint Radio Company | JRC](#)

We maintain your personal contact details and are compliant with the Data Protection Act 2018 (DPA 2018) for the purpose of 'Legitimate Interest' for communication with you. If you would like to be removed, please contact [Redacted]

On Thu, 12 Mar at 6:49 AM , Joint Radio Company <wftracker@jrc.co.uk> wrote:

If any details of this proposal change, particularly the disposition or scale of any turbine(s), this clearance will be void and re-evaluation of the proposal will be

necessary.

**Please do not reply to this email - the responses are not monitored.
If you need us to investigate further, then please use the link at the end of this response
or login to your account for access to your co-ordination requests and responses.**

Dear Ross,

Site Name: Marram Wind

Offshore Development:

Max Tip Height: 350m

Max Rotor Radius : 163m

Max HH (Calc: 187m)

(from Scoping Report: EIA - Plate 2.3.2)

This offshore proposal is *cleared* - with respect to radio link infrastructure operated by the local energy networks.

Onshore: JRC CANNOT clear this part of the development, due to lack of clear location information (NGR, elevation).

NB: This information was requested by email on 16/9/24

Due to lack of information, JRC **must ***object*** to the onshore part of this development**, due to the proximity of protected links in the intended development area.

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. If any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, you are advised to seek re-coordination prior to submitting a planning application, as this will negate the possibility of an objection being raised at that time as a consequence of any links assigned between your enquiry and the finalisation of your project.

JRC offers a range of radio planning and analysis services. If you require any assistance, please contact us by phone or email.

Regards

Wind Farm Team

**Marine Analytical unit
("MAU")**

MarramWind Offshore Wind Farm

Marine Analytical Unit (“MAU”) Response **Marine Directorate**

A section 36 consent, marine licence application, Environmental Impact Assessment (“EIA”) report and supporting documentation has been provided by MarramWind Limited. The EIA report includes a description of a range of potential impacts, of which this response focuses only on the assessment of social and economic impacts.

Methodology

The potential effects have been considered at a number of different geographies:

- Local: Scottish electoral wards (council wards) including communities and ports close to the main Project activities
- Regional: wider areas of one or a group of local authority districts including markets for employment and supply chain activities resulting from the Project
- National: Scotland, including recognition of the overarching UK policy context

The applicant states that many of the impacts are likely to have a regional epicentre in the northeast of Scotland, which includes the nearest land to the Project as an operational wind farm as well as the area of coast proposed for landfall. This area is within the local authority areas of Aberdeenshire and Aberdeen City. The area of the four wards comprising of the hinterland of Aberdeen, Peterhead and Fraserburgh is also represented as a comparator for the socio-economic characteristics of the port data.

While the applicant states that the whole lifetime of the project including construction, operation and maintenance (“O&M”), and decommissioning has been considered, socio-economic impacts as a result of decommissioning have not been assessed in detail and instead a decommissioning programme will be developed which will consider the socio-economic consequences. Therefore, the MAU cannot comment on the impacts during the decommissioning phase.

The assessment uses magnitude and significance methodology. The magnitude is determined by the importance of the receptor (economic, social or tourism and recreation). The sensitivity is determined by the ability of the study area to absorb the change. The magnitude and sensitivity are combined to identify the significance of the effect, with a significant effect defined as a major or moderate effect, which is intermediate to a very large change in receptor condition, which are likely to be an important consideration to the study area. The indicative assessment thresholds that are used differ based on the impact, based on a quantitative scale originally developed for Hinkley Point C. While the use of this quantitative scale may be appropriate, the MAU would require further information on the rationale of using this in an offshore wind context to be able to make a full assessment of its use.

A maximum design scenario has been used to assess the magnitude and significance of the potential effects. This means that minimum beneficial and maximum adverse effects should be presented.

Assessment of impacts

All socio-economic impacts identified during the scoping stage were considered. Socio-cultural and distributional effects, which were proposed to be scoped out in the Scoping Report, have also been included.

The assessments considered the following potential effects:

- Effects from Project demand for labour
- Effects from supply of labour to meet Project demand
- Effects from Project demand for products and services
- Effects from supply of products and services
- Effects from economic activity (GVA) within the local and wider economies
- Impact from increase in population
- Effects from Project transport and access requirements
- Effect from use of land and marine areas
- Effects from disruption to community access to recreational, tourism and other amenity resources
- Effects from activities affecting specific natural assets with socio-economic importance
- Effects from disruptions to commercial activities
- Effects from socio-cultural and distributional effects

Transboundary effects, which were proposed to be scoped out at the Scoping stage, have not been assessed.

Impacts

During the construction phase, the assessment anticipates a major (significant) beneficial effect in terms of supply of Labour to meet Project demand. It also anticipates a major (significant) beneficial effect in terms of supply of products and services.

It is unclear if the applicant has concluded that increased economic activity (GVA) within the local and wider economies is being anticipated to have a moderate (significant) beneficial or moderate (not significant) beneficial effect. This is due to the discrepancies between the text on page 79 and table 1.28 on page 97,

The impact on the use of land and marine areas has been anticipated to be moderate (potentially significant) adverse during the construction phase. However, it is assessed to be not significant because of the “*underlying conservative approach and because the variety and range of effects provides a wide scope for design and mitigation actions*”. The MAU recommends that the overall significance of any impacts should be assessed prior to any proposed mitigation. The MAU cannot comment on the suitability of the design or mitigation actions that will occur at a later stage.

For the O&M phase, Project demand for labour, Project demand for products and services, Supply of products and services, and socio-cultural and distributional effects are all anticipated to have a moderate (significant) beneficial effect. Supply of labour to meet Project demand, and economic activity (GVA) within the local and wider economies are both anticipated to have major (significant) beneficial effects.

A number of mitigation and enhancement measures have been outlined within the socio-economic impact assessment including the development of the Socio-Economic Action Plan (“SEAP”). The MAU cannot comment on the suitability of the mitigations and enhancements themselves but welcomes the stakeholder consultation that took place to inform the development of the SEAP.

Consultation and engagement

The applicant states that consultation and engagement have taken place throughout the process to date. Alongside consultation on the scoping report, stakeholder consultations with Aberdeenshire Council, Moray Council, Highland Council, Scottish Enterprise, Highlands & Islands Enterprise, ETZ, Buchan Development Partnership, and Peterhead Community Council, was also undertaken to inform the development of SEAP.

Summary

Overall, the assessment of socio-economic impacts during construction and O&M is conducted to a satisfactory methodological standard. The MAU cannot comment on the assessment of impacts during the decommissioning phase as this has not been provided in any detail. The MAU suggests where comparisons to the literature or other projects are used, information should be included as to why this is suitable.

Ministry of Defence



Defence Infrastructure Organisation

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

Application Ref: 00011544, 00011545, 00011546
and 00011547

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

Our Reference: DIO10058394

Jennifer Goodheir
Scottish Government
Licensing Operations Team
Marine Directorate
5 Atlantic Quay
150 Broomielaw
GLASGOW
G2 8LU

12 March 2026

Dear Jennifer

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

00011544, 00011545, 00011546 & 00011547 – MarramWind Ltd – MarramWind Offshore Wind Farm - 75 and 110 kilometres off the North-East coast of Scotland.

Thank you for consulting the Ministry of Defence (MOD) in relation to the above Section 36 application and Marine Licences through your communication dated 19 January 2026.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I write to advise the safeguarding position of the MOD in relation to the above applications to construct and operate the Marramwind Offshore Wind Farm.

This scheme will comprise of:-

- up to 225 wind turbine generators (WTGs), with a maximum height to blade tip of up to 350 metres above Mean Sea Level (MSL), located approximately 75-110km offshore of the Aberdeenshire coast, north of Peterhead;

- up to four Offshore Substation Platforms (OSPs) with a maximum height of 100 metres above Lowest Astronomical Tide (LAT);
- up to two Offshore Reactive Compensation Platforms (RCPs) with a maximum height of 100m above LAT;
- up to four Subsea Substations;
- interconnector cables and up to five offshore export cables connecting the OSPs to the landfall on the Aberdeenshire coast between Scotstown and Lunderton; and
- onshore export cables to up to three onshore substations.

The principal concerns of the MOD with respect to this proposed wind farm relate to the impact of the development on the operation and capability of air defence radar systems and the potential to create a physical obstruction to air traffic movements.

At this time the MOD must **object** to the proposed development on the basis that the scheme would have a significant and detrimental impact on the effective operation and capability of air defence radar deployed at Remote Radar Head (RRH) Buchan.

Air Defence (AD) radar

The proposed WTGs would be located approximately 95.6km from, detectable by, and will cause unacceptable interference to the AD radar deployed at RRH Buchan.

WTGs have been shown to have detrimental effects on the operation of radar. These include the desensitisation of radar in the vicinity of the WTGs, and the creation of “false” aircraft returns. The probability of the radar detecting aircraft flying over or in the vicinity of the WTGs would be reduced, hence WTG proliferation within a specific locality can result in unacceptable degradation of the radar’s operational integrity. This would reduce the RAF’s ability to detect and deter aircraft in United Kingdom sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the United Kingdom.

Our assessments have determined that, when operational, the proposed wind farm will cause unacceptable and unmanageable interference to the effective operation of an air defence radar deployed at RRH Buchan.

The need to mitigate the impacts of the proposed development upon the effective operation of RRH Buchan has been recognised by the applicant and is set out in Volume 1, Chapter 31, Civil and Military Aviation of the Environmental Impact Assessment Report (EIAR) Document code MAR-GEN-ENV-REP-WSP-000036 dated 8 December 2025. The applicant has not proposed a suitable mitigation but has stated at paragraph 31.10.4.18 their commitment to continued consultation with the MOD aimed at delivering a suitable mitigation solution with regard to RRH Buchan AD. The MOD welcomes this commitment.

Therefore, on the basis of the information provided, and until a suitable mitigation scheme has been submitted, assessed, and accepted, the MOD must **object** to this proposal due to the impact it will have on the AD radar deployed at RRH Buchan.

Physical Obstruction

In this case the development falls within Low Flying Area 14 (LFA 14). Within this area fixed wing aircraft may operate as low as 250 feet or 76.2 metres above surface level to conduct low level flight training. The addition of turbines and other structures in this location would introduce a physical obstruction to low flying aircraft operating in the area.

In the event that the applicant is able to overcome the objections listed above regarding air defence radar the MOD would require that conditions are added to any consent issued requiring the submission, approval and implementation of an aviation lighting scheme, and that sufficient data is submitted to ensure that

structures can be accurately charted to allow deconfliction. The Applicant has acknowledged the MOD requirement for MOD accredited aviation safety lighting and the need to submit sufficient data to enable charting of the structures at Table 31.7 in Volume 1, Chapter 31, Civil and Military Aviation and in Volume 3, Appendix 5.2, Commitments Register. However, commitment M-101 states an incorrect height for those temporary obstacles which need to be identified to military aviation crews; the height criteria is 50m or more not 91.4m or more.

As this development includes structures other than wind turbine generators that exceed a height of 50m above LAT these structures would be subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to any CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.

Offshore and Onshore Transmission Assets, including Landfall

The Transmission Assets will make landfall between Scotstown and Lunderton, north of Peterhead on the Aberdeenshire coast. The onshore landfall and onshore Transmission Assets elements of the development do pass through the statutory technical safeguarded zone for RAF Buchan. Assessments completed by the MOD have identified that there are no safeguarding concerns with the onshore landfall and onshore Transmission Assets elements of the proposed development.

Summary

For the avoidance of any doubt, MOD must **object** to the proposal on the grounds of the unacceptable impact that the development would have on air defence radar systems deployed at RRH Buchan.

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

Yours sincerely

[Redacted]

Wendy Talbot
Assistant Safeguarding Manager

Maritime and Coastguard Agency (“MCA”)



Maritime &
Coastguard
Agency

Vaughan Jackson
Maritime and Coastguard Agency
UK Technical Services Navigation
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca
6th March 2026

Licensing Operations Team,
Marine Directorate,
Scottish Government,
5 Atlantic Quay,
150 Broomielaw,
Glasgow,
G2 8LU.

By email to MD.MarineRenewables@gov.scot

Dear Marine Directorate,

APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE (SCOTLAND) ACT 2010 AND PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 FROM MARRAMWIND LIMITED TO CONSTRUCT AND OPERATE THE MARRAMWIND OFFSHORE WIND FARM.

Thank you for the opportunity to comment on the applications for consent under Section 36 of the Electricity Act 1989 and marine licences under the Marine (Scotland) Act 2010 for the MarramWind Offshore Wind Farm.

The Maritime and Coastguard Agency (MCA) is an Executive Agency of the Department for Transport and is responsible throughout the UK for implementing and developing the UK Government's maritime safety and environmental protection policy. This includes co-ordinating maritime Search and Rescue (SAR) through His Majesty's Coastguard 24 hours a day and checking that ships meet UK and international safety rules. The MCA works to prevent the loss of lives at the coast and at sea, to ensure that vessels are safe, and to prevent coastal pollution. The UK Technical Services Navigation Branch is responsible for UK radiocommunication and navigation policy. This primarily covers SOLAS Convention (Safety of Life at Sea Convention 1974, as amended) Chapters IV and V; the COLREG Convention (International Regulations for Preventing Collisions at Sea 1972, as amended); and the ITU Convention (International Telecommunications Convention 1932, as amended).

The Navigation Risk Assessment (NRA) and the shipping and navigation elements of the Environmental Impact Assessment Report have been reviewed, and we would like to comment as follows:

Navigation Risk Assessment

Anatec Limited has undertaken a detailed NRA in accordance with MCA guidance (MGN 654) and NRA risk assessment methodology. This NRA, which is presented in Volume 3, Appendix 15.1, informs the Shipping and Navigation chapter of the EIA presented in Volume 1, Chapter 15.

We are satisfied that appropriate traffic data has been collected in accordance with MGN 654, which includes two 14-day marine vessel traffic surveys. We note that full surveys were carried out in August 2022 and January 2023 but owing to application date being delayed these fell outside the two-year validity period. As such the surveys were repeated. The first of the surveys was conducted in Summer 2024 (19th July – 2nd August), and the second survey was conducted in Winter 2024 (6th – 19th November).

Additionally, Automatic Identification System (AIS) only summer and winter surveys were carried out during the same period which covered the offshore export cable corridor areas. Finally, 12 months of AIS data for 2024 have been utilised to characterise vessel traffic movements for the Reactive Compensation Platform (RCP) search area. The site-specific survey details are all presented in Table 15.6 of Chapter 15 of the EIA and Table 5.1 of the NRA.

The MCA is content that the hazard log presented in Appendix B, Table B.1 of the NRA is a reasonable and proportional assessment of the risks. A completed MGN 654 Checklist has also been provided in Annex A, Table A-1 as part of the NRA, and we are satisfied that all recommendations have been addressed.

It is noted that some of the older studies carried out by the MCA regarding Navigation, Communication, and Position Fixing Equipment are referred to in Section 15 of the NRA. These are supported by other more recent studies which is welcomed. There may be additional benefit in referring to more recent helicopter trials and documents written by the MCA in 2019, titled: “MCA report following aviation trials and exercises in relation to offshore windfarms” and “MCA report following aviation trials at Hornsea Project 1 windfarm”. However, we are content with the conclusions of the impact on navigation, communication and position fixing equipment presented by the applicant.

Emergency Response and Search and Rescue

A SAR checklist based on the requirements in MGN 654 Annex 5 will need to be completed in agreement with MCA before construction starts. This will include the requirement for an approved Emergency Response Co-operation Plan (ERCoP) and will be incorporated as a condition of the Marine Licence.

During SAR discussions, particular consideration will need to be given to the implications of the site size and location. As there are various possible scenarios regarding the planned three phase build out build of MarramWind Offshore Wind Farm as detailed in Volume 1 chapter 4: Project Description, and section 6.2 of the NRA, it would be beneficial for the applicant to confirm the final build out scenario as early in these SAR discussions as possible.

Attention should be paid to the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)) that can cover the entire wind farm sites and their surrounding areas.

Cumulative Impacts

A Cumulative Effects Assessment (CEA) has been made based on existing and proposed developments in the study area as explained and presented in Volume 1, Chapter 33, Cumulative Effects Assessment. These developments are summarised in Section 21 of the NRA.

The main commercial routes and those with potential for deviations have also been identified. 35 routes are highlighted and presented in Table 11.1 of the NRA. Expected cumulative deviations are also represented, with 22 routes being identified and presented in figure 14-3. We are content with this approach to the CEA at this stage.

Layout Design

The turbine layout design will require MCA and Northern Lighthouse Board (NLB) approval prior to construction to minimise the risks to surface vessels, including rescue boats, and search and rescue aircraft operating within the site. The MCA will seek to ensure all structures are aligned in straight rows and columns with a minimum of two lines of orientation. Further advice will be provided to the project once the layout discussions have started.

Marking, Lighting and Construction Programme

The MCA will seek to ensure the turbine numbering system follows a 'spreadsheet' principle and is consistent with other windfarms in the UK. All lighting and marking arrangements will need to be agreed with the MCA and the NLB. The MCA requires all aviation lighting to be visible 360° and compatible with night vision imaging systems, as detailed in CAP 764 and MGN 654 Annex 5. We would also expect to see some form of linear progression of the construction programme avoiding disparate construction sites across the development area, and the consent needs to include the requirement for an agreed construction plan to be in place ahead of any works commencing.

Wet Storage

It is noted from the non-technical summary and project description that MarramWind will be utilising floating structures in the final design of the wind farm. The MCA agree that wet storage options for these structures, especially around fully constructed floating WTGs, as mentioned in section 6.4 of the NRA, are yet to be fully explored. We would encourage the applicant when discussing any potential options to consult other relevant maritime stakeholders including the MCA and NLB.

Regarding the storing of components on the seabed within the array area as mentioned in section 4.6.3 and 4.6.5 of Chapter 4, Project Description, as the charted depths range from approximately 85m-135m, it is not expected that any storage would increase the risk to surface navigation. However, the MCA will need to be informed of materials to be stored within the array (and along the export cable corridor) and made aware of any that will exceed a 5% reduction in surrounding depth referenced to Chart Datum.

Mooring Arrangements

As MarramWind Offshore Wind Farm will include floating structures, Third Party Verification of the mooring arrangements for all floating devices will be required prior to construction to provide assurance against loss of station. Ideally this will be a condition of the marine licence. Guidance on regulatory expectations on mooring arrangements can be found on our website: <https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>. Compliance with regulatory expectations on moorings for floating wind and marine devices (Health and Safety Executive (HSE) and MCA, 2017), has been listed as embedded mitigation measure M-044, which is welcomed by the MCA.

We note that loss of station has formed part of the scope of assessment, being considered in sections 15.9-15.11 of Chapter 15 and sections 18-20 of the NRA. As such, there is an expectation from the MCA that a system of continuous monitoring for each individual floating WTG be incorporated. We welcome the acknowledgment in paragraph 657 of the NRA that a system will be developed in line with Regulatory Expectations. The use of GPS in this system would be expected but inclusion of AIS

on all floating structures, the overall particulars of this system and recovery arrangements in case of a loss of station will need further discussion with the MCA and NLB prior to construction.

Hydrographic Surveys

MGN 654 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Further information can be found in MGN 654 Annex 4 supporting document titled 'Hydrographic Guidelines for Offshore Developers', available on our website: <https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>. This includes surveys during the pre-construction, post-construction and post-decommissioning stages. We would like to highlight the need to provide the data in either GSF or CARIS format and that Total Vertical and Horizontal Uncertainty (TVU & THU) calculations must be provided.

Cable Routes

The exact export cable route to the landfall and potential location of the RCP is reasonably developed as presented in Plate 3 of the non-technical summary and figure 7-2 and 7-3 of the NRA. It is noted in table 1.1 of Volume 3, Appendix 5.2: Commitments Register (as Mitigation M-054) that a Cable Burial Risk Assessment (CBRA) is to be carried out and a cable plan (CaP) produced. Any consented cable protection works must ensure existing and future safe navigation is not compromised. The MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum.

As stated in paragraph 4.2.3.8 of Volume 1, Chapter 4, both High Voltage Alternating Current (HVAC) and High Voltage Direct Current (HVDC) transmission infrastructure is to be used. Therefore, a pre-construction compass deviation study is required. The MCA welcome the study presented in its entirety in Volume 1, Chapter 9: Electromagnetic Fields, and as a desk study as presented in section 15.6 of the NRA. MCA agree with the conclusions and are content that the risk to shipping and navigation remains low on this occasion.

Safety Zones

The requirement and use of safety zones as detailed in the application, specifically as mitigation measure M-031 in table 1.1 of Volume 3, Appendix 5.2: Commitments Register, is noted. MCA supports the use of safety zones and will comment on the safety zone application once submitted, as a statutory consultee.

Liaison with local MCA Marine Office

The applicant should be reminded that their contractors and subcontractors must have the required certification for all vessel operations, and early engagement with the local MCA Marine Office should be undertaken where necessary to ensure there are no issues with regards to survey and inspections, towage, and safety requirements. Various additional certificates including a load line exemption for any floating turbine platforms will be required prior to any towage to site and the applicant must ensure any ballast water requirements are addressed.

Embedded Mitigation

We have the following comments on the proposed risk controls in section 22, Table 22.1 of the NRA:

1. Cable Burial Risk Assessment;
 - In case of damage to, or destruction or decay of, the authorised project seaward of MHWS or any part thereof, excluding the exposure of cables, notification must be issued to MCA, NLB, the Kingfisher Information Service of Seafish and the UKHO within 24 hours of becoming aware.

- In case of exposure of cables on or above the seabed, the undertaker must within three days following identification of a potential cable exposure, notify mariners and inform Kingfisher Information Service of the location and extent of exposure. Copies of all notices must be provided to the MCA, NLB, and the UKHO within 5 days.
- The plan must include proposals for monitoring offshore cables including cable protection during the operational lifetime of the authorised scheme which includes a risk-based approach to the management of unburied or shallow buried cables.
- Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary.

2. Vessel Management and Navigation Safety Plan (VMNSP);

- Local notification to mariners must be issued at least 14 days prior to the commencement of the authorised project or any part thereof advising of the start date of each work and the expected vessel routes from the construction ports to the relevant location. They must be updated and reissued at weekly intervals during construction activities and at least 5 days before any planned operations (or otherwise agreed) and maintenance works and supplemented with VHF radio broadcasts agreed with the MCA.
- The Kingfisher Information Service of Seafish, must be informed of details of the vessel routes, timings and locations relating to the construction of the authorised project or any part thereof by email to kingfisher@seafish.co.uk :-
 - i. at least 14 days prior to the commencement of offshore activities, for inclusion in the Kingfisher Fortnightly Bulletin and offshore hazard awareness data, and;
 - ii. as soon as reasonably practicable and no later than 24 hours of completion of all offshore activities.
- Post construction monitoring is required and must include vessel traffic monitoring by automatic identification system for a duration of three consecutive years following the completion of construction of the authorised project. An appropriate report must be submitted to the MCA and NLB at the end of each year of the three-year period.

Conclusion

The comments detailed above are not considered to be blocks to development, but they are provided to highlight any areas which may require further discussion. Subject to the applicant meeting requirements addressed in this letter and meeting the licence conditions, it provides a cautious acceptance of the application for consent.

Yours faithfully,

[Redacted]

[Redacted]

Vaughan Jackson
Offshore Renewables Project Lead
Marine Safety and PNT Services

Peter Lowson
Head of Operational Procedures
and Information Management.
**HM Coastguard Governance,
Procedures, Assurance and
International**

Natural England

Date: 02/03/2026
Our ref: 538819
Your ref: 00011544, 00011545, 00011546 & 00011547



Tyneside House,
Skinnerburn Road,
Newcastle-upon-Tyne,
NE4 7RA

0300 – 060 3900

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

Via email only

Dear Jennifer,

00011544, 00011545, 00011546 & 00011547 – MarramWind Ltd – MarramWind Offshore Wind Farm

Thank you for seeking our advice on MarramWind Offshore Wind Farm in your consultation which we received on 19/01/2026.

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

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). As the application is located outside English territorial waters then the advice from NatureScot, the statutory nature conservation body in offshore Scottish waters should be sought.

Due to our remit, our advice on this consultation is restricted to species within England and to protected species from English designated sites which may be impacted by the proposed wind farm.

We provide our advice based on the following documents:

- Report to Inform Appropriate Assessment, December 2025 (MAR-GEN-ENV-REP-WSP-000176)

The Conservation of Habitats and Species Regulations 2017 (as amended) and The Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended)

We have considered the documents provided with the consultation request in our review, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal. We advise that, providing there are no substantial changes to the project design envelope, this project alone will not have an Adverse Effect on Site Integrity (AEoSI) on any English SPA or SAC. We also agree that any addition to in combination impacts with other projects will be de-

minimis and as such are unlikely to significantly contribute to AEoSI for any English SPA or SAC in combination with the other Plans or Projects assessed.

Marine and Coastal Access Act 2009

The works, as set out in the information supplied by the applicant, are not sited within or near to a Marine Conservation Zone. Natural England have not identified a pathway by which impacts from the development would affect the interest features of any MCZ. We are therefore confident that the works will not hinder the conservation objectives of such a site.

Other Relevant Matters

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

For any queries relating to the content of this letter please contact me using the details provided below. To provide the further information requested in this advice and for subsequent consultations, please email consultations@naturalengland.org.uk

Yours sincerely

Dan Donald

Marine Higher Officer
Northumbria Marine Team
Email: [Redacted]

NATS

From: [NATS Safeguarding](#)
To: [MD Marine Renewables](#)
Cc: [Redacted] ; [NATS Safeguarding](#)
Subject: RE: 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 3 March 2026
Date: 20 January 2026 10:33:59
Attachments: [image001.png](#)
[image002.png](#)

Jennifer,

NATS has previously expressed concern regarding the impact of the proposed MarramWind Offshore Wind Farm on our operations. In relation to this latest application to the Scottish Ministers NATS notes the statement in the Environmental Impact Assessment Report Volume 1, Chapter 31:

31.10.4.14 Consultation with NATS is ongoing with the aim of delivering a suitable mitigation solution for Allanshill and Perwinnes PSRs prior to the O&M stage of the Project

NATS will continue to engage with the developer with aim of identifying a suitable mitigation however until such time as this we have reached agreement NATS position remains one of objection to the proposed development.

NATS reference SG31442

Regards,

Alasdair

NATS Safeguarding

NATS Internal

Northern Lighthouse Board ("NLB")



Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: 0131 473 3100
Fax: 0131 220 2093

Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: MarramWind OWF – S36 Consent & ML Application
Our Ref: AL/OPS/ML/WIND_002_26

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

26 January 2026

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

Application for Consent Under Section 36 of the Electricity Act 1989 and Marine Licences Under Part 4 of the Marine (Scotland) Act 2010 and Part 4 of the Marine & Coastal Access Act 2009 to Construct and Operate the MarramWind Offshore Wind Farm, Approximately 41nM Northeast of Rattray Head

Thank you for your e-mail correspondence dated 19th January 2026 relating to the application submitted by **MarramWind Ltd** for consent to develop the MarramWind Offshore Wind Farm, located approximately 41nM northeast of Rattray Head.

Northern Lighthouse Board note that the MarramWind OWF will consist of up to 225 floating Wind Turbine Generators (WTG) with an approximate export capacity of up to 3GW. A maximum of four Offshore Substation Platforms (OSP) will be installed within the array. Landfall sites for up to five offshore export cables have been identified at Scotstown and Lunderton, Aberdeenshire. It is noted that should these OEC utilise HVAC transmission technologies, up to two Reactive Compensation Platforms (RCP) will be required approximately midway along the OEC route.

NLB respects your privacy and is committed to protecting your personal data.
To find out more, please see our Privacy Notice at www.nlb.org.uk/legal-notice/

NLB have reviewed the documentation associated with the application, with particular reference to the navigational safety elements of the application contained within Chapter 15 (Shipping & Navigation), Chapter 18 (Infrastructure & Other Marine Users), Chapter 32 (inter-Related Effects), and Chapter 33 (Cumulative Effects Assessment).

The inclusion of Outline Post-Consent Documentation such as the Outline Lighting & Marking Plan (LMP) and Outline Vessel Management and Navigational Safety Plan (VM&NSP) is welcomed. NLB note the hazards identified through the Navigational Risk Assessment (NRA) process, and the associated mitigations detailed within Table 17.1 of the NRA.

Northern Lighthouse Board note that whilst Wet Storage is acknowledged within the EIA, it will be considered as part of a separate consenting process.

Within Section 5.2 of the Outline Lighting & Marking Plan, it is stated that monitoring of Aid to Navigation (AtoN) will be undertaken visually during the construction phase and remotely via a SCADA system during the O&M phase. In Section 5.3 it is stated that monitoring of AtoN during the construction phase will be undertaken remotely. **NLB advise that this discrepancy is corrected.**

NLB request that within Section 5.4 of the Outline L&M Plan, it is included that a record of the annual AtoN testing is kept for auditing purposes.

NLB also acknowledge the commitment to engage with NLB with regard to a significant failure of AtoN, and potential mitigations including the deployment of a guard vessel. **NLB request that this wording is amended to include alternative solutions such as temporary buoyage or AtoN deployed on adjacent WTG structures.**

Northern Lighthouse Board request that a section is included within the LMP to cover situations whereby an IPS/SPS structure is removed for maintenance, and the provision of temporary AtoN to cover this maintenance period.

It is also requested that the maintenance of AtoN is included with the O&M Manual, and that the LMP is referenced where necessary.

The establishment, alteration and discontinuation of any Aid to Navigation is subject to the Statutory Sanction of the Commissioners of Northern Lighthouses. Further guidance and application forms can be obtained on request from the NLB Navigation Department (navigation@nlb.org.uk).

NLB operate vessels in the Central North Sea as part of their statutory duties under the Merchant Shipping Act 1995. However, this is largely for the inspection of AtoN installed on offshore installations. Aids to Navigation associated with MarramWind OWF would be incorporated in to these inspection voyages, and NLB do not anticipate that the project will negatively impact these operations.

NLB respects your privacy and is committed to protecting your personal data.
To find out more, please see our Privacy Notice at www.nlb.org.uk/legal-notice/

Ms J Goodheir
MarramWind OWF – S36 Consent & ML Application
Pg. 3

Northern Lighthouse Board have no objection to the proposed MarramWind OWF, and will continue to engage with the applicant with regard to the development of post-consent navigational safety documentation.

Yours sincerely

[Redacted]

Peter Douglas
Navigation Manager

NLB respects your privacy and is committed to protecting your personal data.
To find out more, please see our Privacy Notice at www.nlb.org.uk/legal-notice/

North Sea Midstream Partners Operations Limited



5th Floor, 28-29 Dover Street
London
W1S 4NA

Marine Directorate
Licensing Operations Team
Scottish Government
375 Victoria Road
Aberdeen
AB11 9DB

Sent by email to: MD.MarineRenewables@gov.scot

02 March 2026

Dear Sirs

Marram Wind Farm

Application for consent under section 36 of the Electricity Act 1989 and for marine licences under section 20 of the Marine (Scotland) Act 2010 and section 65 of the Marine and Coastal Access Act 2009

We refer to the above noted application by MarramWind Limited to Scottish Ministers and note that the proposed development is subject to an environmental impact assessment (“**EIA**”) under the regulations detailed in the Public Notice.

NSMP Operations Limited (“**NSMP**”) owns the St. Fergus Gas Terminal (“**SFGT**”) and PX Limited is our site operations and maintenance contractor.

The FUKA and Vesterled gas transportation pipelines land at SFGT for processing. NSMP owns and operates the FUKA pipeline and SFGT. Petoro AS owns the Vesterled pipeline and it is operated by Gassco AS. NSMP operates a portion of the Vesterled pipeline onshore at SFGT.

In accordance with the Public Notice, NSMP requests that the Scottish Ministers take into the account the comments noted below when deciding this application:

1. SFGT is designated as a national development by National Planning Framework 4 and protected by local development policy PR2 Reserving and Protecting Important Development Sites.
2. The application is not currently supplied with sufficiently detailed information to allow us to make a full assessment. However, NSMP does not object to the principle of this development.
3. We note that the FUKA and Vesterled gas transportation pipelines are within the Offshore Red Line Boundary.



5th Floor, 28-29 Dover Street
London
W1S 4NA

Marine Directorate
Licensing Operations Team
Scottish Government
375 Victoria Road
Aberdeen
AB11 9DB

Sent by email to: MD.MarineRenewables@gov.scot

02 March 2026

Dear Sirs

Marram Wind Farm

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The FUKA and Vesterled gas transportation pipelines land at SFGT for processing. NSMP owns and operates the FUKA pipeline and SFGT. Petoro AS owns the Vesterled pipeline and it is operated by Gassco AS. NSMP operates a portion of the Vesterled pipeline onshore at SFGT.

In accordance with the Public Notice, NSMP requests that the Scottish Ministers take into the account the comments noted below when deciding this application:

1. SFGT is designated as a national development by National Planning Framework 4 and protected by local development policy PR2 Reserving and Protecting Important Development Sites.
2. The application is not currently supplied with sufficiently detailed information to allow us to make a full assessment. However, NSMP does not object to the principle of this development.
3. We note that the FUKA and Vesterled gas transportation pipelines are within the Offshore Red Line Boundary.



This is consistent with the statement at Paragraph 18.6.1.15 of Chapter 18 of the EIA which identifies that there are multiple pipelines converging towards the north shoreline of the Offshore Red Line Boundary. This is illustrated at Volume 2 Figure 18.6 of the EIA, an extract of which is attached.

Accordingly, if the Scottish Ministers decide to grant permission, NSMP requests that the Scottish Ministers impose conditions requiring the applicant to consult with NSMP on any aspects of the development (including construction or proposed vessel routes) within 500m of FUKA and/or Vesterled pipelines so that appropriate contractual arrangements for asset protection and cooperation can be discussed.

We will share details of this consultation with Gassco AS in its capacity as operator of the Vesterled pipeline.

We kindly request that any further correspondence on this matter is directed to:

[Redacted] [Redacted]);
Stuart Horne (Asset Director, NSMP [Redacted]); and
[Redacted] [Redacted] , PX Limited [Redacted] :

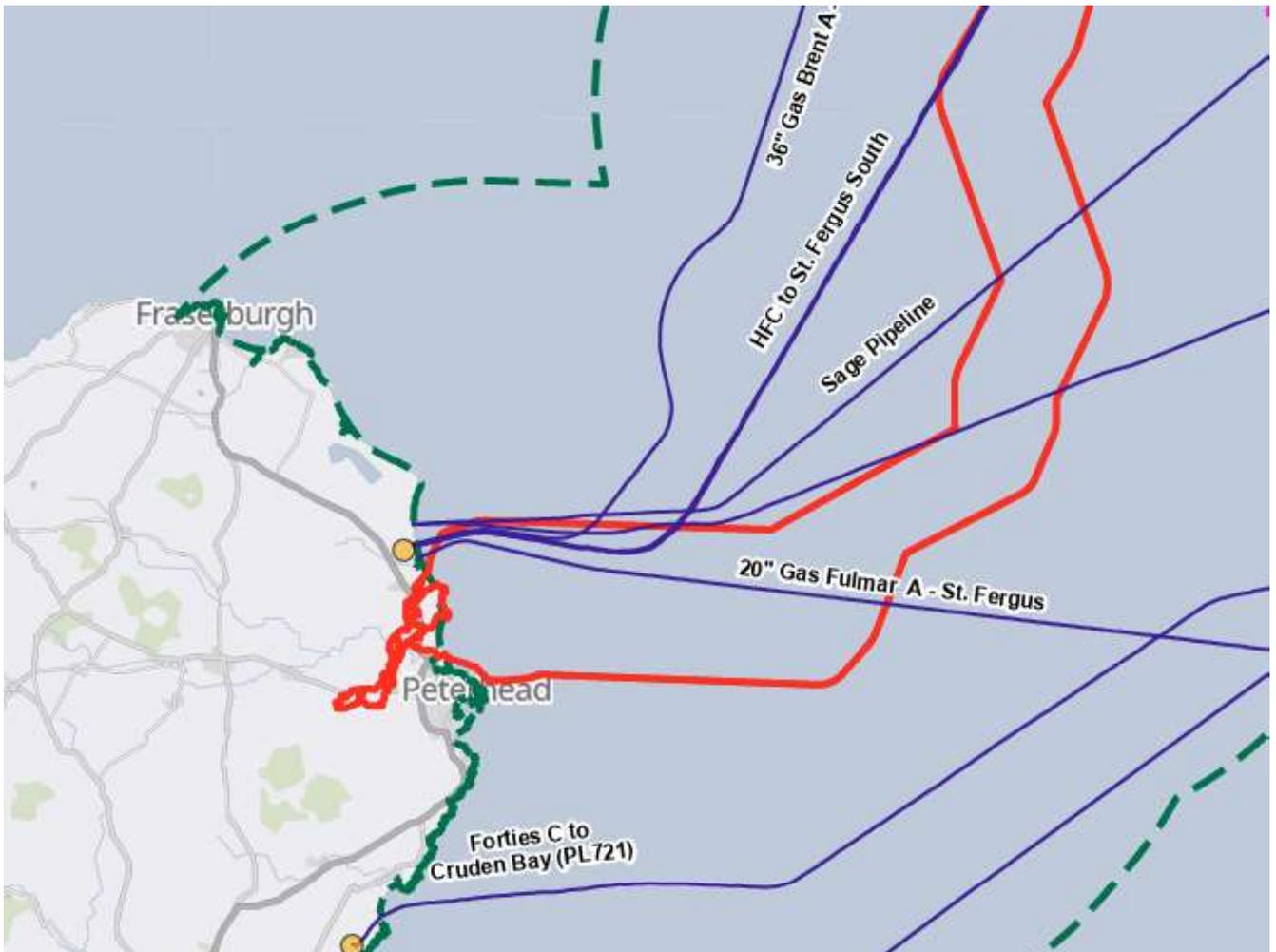
Yours sincerely

[Redacted]

Stuart Horne
Asset Director - SFGT
NSMP Operations Limited

Attachment

**Extract of EIA Chapter 18
Volume 2 Figure 18.6**



Oil and Pipelines Agency

From: [Info](#)
To: [MD Marine Renewables](#)
Cc: [Redacted]
Subject: RE: 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 3 March 2026
Date: 26 January 2026 11:06:55
Attachments: [image002.png](#)
[image004.png](#)
[image005.png](#)

Good morning,

Thank you for your email dated 19 January 2026 regarding the MarramWind Offshore Wind Farm consultation. After reviewing the details, we have determined that, given the offshore nature of the development, there should be no impact on the sites that are operated and managed by the Oil and Pipelines Agency in Scotland.

We thank you for taking the time to bring this matter to our attention.

Kind regards

Grace Buckley

OPA Secretariat



Head Office: St George's House, Weevil Lane, Gosport PO12 1AP

t: 020 7420 1670 **w:** <http://www.gov.uk/opa>

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Royal Yachting Association ("RYA")



26 January 2026

Jennifer Goodheir
Casework Officer
Marine Directorate - Licensing Operations Team
Scottish Government,
5 Atlantic Quay,
150 Broomielaw,
Glasgow,
G2 8LU
MD.MarineRenewables@gov.scot

Dear Jennifer,

00011544, 00011545, 00011546 & 00011547 – MarramWind Ltd – MarramWind Offshore Wind Farm

I have looked at the above applications on behalf of RYA Scotland and can confirm that we have no objections to the consents being given.

I note that the locations for construction, integration and wet storage have still to be determined. As the latter, in particular, has the potential to affect other marine activities it is important that the developers continue to work with other sectors to minimise problems.

Yours sincerely,

[Redacted]

Dr G. Russell FCIEEM(retd) FRMetS

Planning and Environment Officer, RYA Scotland

Salamander Wind Project Company Ltd



Powered by Odfjell Oceanwind
and Simply Blue Energy

Salamander Wind Project Company Ltd.

E: info@salamanderwind.com

W: <https://salamanderfloatingwind.com/>

5 March 2026

Salamander Wind Project Company Ltd
c/o Odfjell Oceanwind PD UK Ltd
Prime View
Prime Four Business Park
Kingswells
Aberdeen
Aberdeenshire
United Kingdom
AB15 8PU

Marine Directorate Licensing Operations Team (MD-LOT)

By email: MD.MarineRenewables@gov.scot

Our ref: 100010-G-ME-0003

Dear Sir / Madam,

RESPONSE TO THE APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND A MARINE LICENCE UNDER PART 4 OF THE MARINE (SCOTLAND) ACT 2010 AND PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE MARRAMWIND OFFSHORE WIND FARM, 75 AND 110 KILOMETRES OFF THE NORTH-EAST COAST OF SCOTLAND

Thank you for consulting Salamander Wind Project Company Limited (SWPC) on the application submitted to the Scottish Ministers on 5 January 2026, in accordance with the above legislation, to construct and operate the MarramWind Offshore Wind Farm and transmission infrastructure at a site off the north-east coast of Scotland by MarramWind Limited ("the Applicant").

The Salamander Offshore Wind Farm is a proposed floating wind farm comprising up to seven offshore wind turbine generators with a capacity of up to 100 megawatts; the Offshore Array Area is located approximately 35 km off the coast of Peterhead. The Offshore Export Cable is planned to make landfall east of Lunderton, approximately 2.5 km north of Peterhead, with the onshore infrastructure including the onshore substation and onshore export cable corridor located on nearby land at Lunderton, between the A90 and the coast.

Salamander Offshore Wind Farm is being developed by SWPC, a joint venture (JV) partnership between Odfjell Oceanwind, Simply Blue Energy and Subsea7. SWPC was granted Section 36 Consent and Marine Licence by the Scottish Ministers for the Salamander Offshore Wind Farm in July 2025. SWPC has also been granted planning permission in principle under the Town and Country Planning (Scotland) Act 1997 by Aberdeenshire Council.

General comments

In the MarramWind EIA Report, it is stated that Ørsted is a JV partner of SWPC. Please note that in August 2025 there was a change in the partners of SWPC; Ørsted exited the project, selling their stake to Odfjell Oceanwind.

Registered Address: Salamander Wind Project Company Ltd.

c/o Odfjell Oceanwind PD UK Ltd, Prime View, Prime Four Business Park, Kingswells, Aberdeen, Aberdeenshire, United Kingdom, AB15 8PU

Company Number: SC662940

Additionally, in February 2026 the SWPC JV partner Simply Blue Group changed name to Simply Blue Energy.

In the MarramWind Report to Inform Appropriate Assessment (Table 7.2), the Salamander Project is incorrectly categorised as Tier 1d (application submitted but not determined). The categorisation that should be applied to the Salamander Project is Tier 1c (Permitted but not yet implemented). This appears to be an isolated mistake rather than an error impacting weighting within the in-combination assessment or within the cumulative effects assessments of the EIA Report.

Cumulative Effects

MarramWind Offshore Wind Farm is located approximately 50 km from the Salamander Offshore Array Area and the export cable corridors (ECCs) of both projects overlap each other.

Since the Salamander Offshore Wind Farm was consented in July 2025 uncertainty associated with the grid reform process and grid connection dates introduces a potential challenge for the Salamander Project, and other projects, to manage overlapping construction activities. Assuming MarramWind gains all the appropriate consents and the project maintains the schedule shown in Plate 4.16 of the Project Description with construction of Phase 1 commencing in 2030 (as stated in 18.4.3.2), it is likely that the construction periods of the two projects will overlap. This is especially relevant if MarramWind selects Lunderton for Phase 1 landfall as MarramWind's landfall operations and seabed preparations along the rest of the export cable will coincide with Salamander's landfall and export cable installation operations.

Analysing the schedule it appears unlikely there would be overlapping piling operations in the offshore array areas, so cumulative underwater noise impacts are not expected.

Assuming installation of the Salamander Project is completed before MarramWind's export cables are installed there will be a requirement for at least one set of crossings of Salamander's export cables. As per MarramWind's mitigation measures M-186 and M-187, crossing and proximity agreements will be in place prior to construction commencing to ensure effective protection to the cables and safe navigation for marine users. SWPC agrees with the assumption that these agreements will be developed in good time, however note that there is considerable spatial overlap of the offshore ECCs for the two projects, as well as two other offshore wind developments (Green Volt and Muir Mhor), especially in the nearshore and landfall area at Lunderton which is constrained.

SWPC notes that of the three shortlisted landfall sites, the Lunderton North landfall is MarramWind's preferred site. In addition to the EEC spatial constraint noted above, this site directly overlaps with the southern section of Salamander's Landfall Compound Area of Search and less than 500 m from Salamander's Onshore Substation compound. Consequently, it is envisaged that both projects will need to collaborate to ensure safe working practices are adhered to and cumulative impacts to the local community are minimised, especially if there is temporal overlap of landfall operations.

There has already been a range of communication between MarramWind and SWPC, both directly and through the Peterhead Developers Forum, as well as in other multilateral developer workshops, focused on optimising the cable routing, the multiple proposed landfalls at Lunderton and the wider area. As a multi-phased project with three shortlisted landfall options, MarramWind has the ability to select landfall(s) that ease the congestion in the area of Lunderton North, given the existing consented projects at this location. Consequently, SWPC expects that this will be a particular focus for continued bilateral and multilateral engagement in the upcoming months/years as detailed designs of all projects progress, in order to ensure the successful safe installation and operation of the multiple export cables, whilst minimising impacts to the local community, inshore fisheries and marine and terrestrial environments as far as practicable.



Powered by Odfjell Oceanwind
and Simply Blue Energy

Salamander Wind Project Company Ltd.

E: info@salamanderwind.com

W: <https://salamanderfloatingwind.com/>

SWPC is pleased to have had the opportunity to input at this stage and look forward to working with the MarramWind team in relation to potential interactions between our two projects. The Salamander team can be reached through existing contacts or at info@salamanderwind.com.

Yours sincerely

[Redacted]

Marten Meynell

Consents Manager

Salamander Offshore Wind Farm

Registered Address: Salamander Wind Project Company Ltd.

c/o Odfjell Oceanwind PD UK Ltd, Prime View, Prime Four Business Park, Kingswells, Aberdeen, Aberdeenshire, United Kingdom, AB15 8PU

Company Number: SC662940

SEPA

From: [Planning.North](#)
To: [MD Marine Renewables](#)
Cc: [Redacted]
Subject: PCS-20007794 SEPA Response to 00011544, 00011545, 00011546 & 00011547
Date: 20 January 2026 10:04:21
Attachments: [image.png](#)

To Whom It May Concern,

Marine (Scotland) Act 2010

00011544, 00011545, 00011546 & 00011547

MarramWind Ltd – MarramWind Offshore Wind Farm

75 and 110 kilometres off the North-East coast of Scotland

Thank you for the above consultation. Based on the information provided, it appears that this application falls below the thresholds for which SEPA provide site specific advice. Please refer to our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations available [here](#).

Kind regards,

Susan Haslam

Senior Planning Officer



For the future of our environment

Disclaimer

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient, please notify us immediately by return email to postmaster@sepa.org.uk. Registered office: SEPA, Angus Smith Building, 6 Parklands Avenue, Eurocentral, Holytown, North Lanarkshire, ML1 4WQ. Communications with SEPA may be monitored or recorded or released in order to secure the effective operation of the system and for other lawful purposes.

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. Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhruid 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 and Southern Electricity Networks

Scottish Hydro Electric Transmission Plc.
Prime View, Prime Four Business Park
Kingswells Causeway
Aberdeen
AB15 8NY

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

Submitted via email: MD.MarineRenewables@gov.scot

13 March 2026

Dear Marine Directorate, Licensing and Operations Team,

REF: 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications

Thank-you for the opportunity to provide comment on the MarramWind Offshore Wind EIA Section 36 consent and Marine Licence.

As the owner of the electricity transmission network in the North of Scotland, Scottish Hydro Electric Transmission plc (trading as Scottish and Southern Electricity Networks (SSEN) Transmission) we are currently progressing over £22bn of investment across our network area both onshore and offshore, enabling the connection of the renewable energy needed to meet Scottish and UK Government 2030 energy targets and beyond: providing greater home-grown energy security and supporting Scotland and the UK's pathway to Net Zero.

SSEN Transmission appreciates the inclusion and consideration of the Eastern Green Link 3 and Spittal to Peterhead projects throughout the assessments. We believe that Eastern Green Link 5 should also be referenced, as the project is currently in the planning phase and may have overlapping landfall interests at Scotstown Beach. We acknowledge that MarramWind Ltd has retained a high degree of flexibility in its landfall options, with two broad areas identified at Scotstown and Lunderton that will be further refined as the project develops. Given the number of developers—including Eastern Green Link 5—currently considering landfall at Scotstown Beach South (Lunderton), we would like to seek greater clarity on the indicative landfall location for the MarramWind project which will be important as planning progresses. From the Eastern Green Link 5 perspective, we would welcome consideration being given to a preference by MarramWind Ltd for the most northerly Scotstown Beach North landfall option. The Eastern Green Link 5 project team has been and will continue to engage regularly and constructively with MarramWind Ltd, and we remain committed to maintaining close collaboration throughout the planning and installation phases of

both projects. Please see the most recent information available for these projects at the following links [Eastern Green Link 3 - SSEN Transmission](#), [Eastern Green Link 5 - SSEN Transmission](#) and [Spittal to Peterhead Subsea Cable Link - SSEN Transmission](#). We continue to encourage regular engagement between the MarramWind Ltd and SSEN Transmission with respect to the project and export cable corridors and requirements for proximity and/or crossing agreements as per the International Cable Protection Committee and the European Subsea Cables Association guidelines.

It should also be noted that as providers of critical national infrastructure there is the potential for future projects beyond 2030 to be located within and adjacent to the MarramWind offshore windfarm and transmission corridor, therefore presenting the potential for future interactions.

We remain committed to working with other legitimate users of the sea in a proactive manner, enabling all parties to deliver successful projects wherever reasonably possible. This is especially important where crossing agreements are to be developed, giving due consideration and provision for present and future cables to cross both export and generation sites, maintaining the freedom of the seas for both telecommunications and power cables. We reiterate and encourage regular and proactive engagement as the MarramWind Offshore Wind Farm progresses.

Lastly we highlight and suggest the use of our 'Project map' [Project Map - SSEN Transmission](#) as this will provide the most up to date information regarding any developing SSEN Transmission projects.

I am happy to discuss further the comments above should there be any follow-on questions or concerns.

Yours sincerely

Erin Wilson

Assistant Marine Consents Manager

[Redacted]

Scottish Water

Thursday, 22 January 2026



Marine Licensing
375 Victoria Road

Aberdeen

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Steps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk



Dear Customer,

**Marram Wind Offshore Wind Farm, 75 and 110 KM off the NE coast of,
Scotland
Planning Ref: SCOP-0020
Our Ref: DSCAS-0147879-LZF
Proposal: MarramWind Offshore Wind Farm**

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at

<https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and-Developers/Connecting-to-Our-Network> which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

Next Steps:

All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Ruth Kerr

Development Services Analyst
PlanningConsultations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Supplementary Guidance

- Scottish Water asset plans can be obtained from our appointed asset plan providers:
 - Site Investigation Services (UK) Ltd
 - Tel: 0333 123 1223
 - Email: sw@sisplan.co.uk
 - www.sisplan.co.uk
- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for

checking the water pressure in the area, then they should write to the Development Operations department at the above address.

- If a connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.
- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or a Sustainable Drainage System (SUDS) proposed to vest in Scottish Water is constructed.
- Please find information on how to submit application to Scottish Water at our Customer Portal.

Transport Scotland

Jennifer Goodheir
Marine Directorate - Licencing Operations Team (MD - LOT)
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Your ref:
00011544,
00011545,
00011546 &
00011547

Our ref:
GB01T19K05

Date:
11/02/2026

MD.MarineRenewables@gov.scot

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 1990

MARINE (SCOTLAND) ACT 2010

MARINE AND COASTAL ACCESS ACT 2009

With reference to your recent correspondence on the above development, we acknowledge receipt of the Environmental Impact Assessment Report (EIAR) prepared by WSP UK Limited in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Delivery & Operations Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

Proposed Development

The proposed Offshore development comprises “in the region of” 126 to 225 turbines with a tip height of between 142 and 182m, to be located 75km to 110km off the North-East coast of Scotland. The Onshore elements relate to the onshore electricity grid connection infrastructure, landward of MLWS. The EIAR states that the key components are:

- Landfall(s) – the infrastructure associated with landfall(s) located above MLWS;
- Underground onshore export cables running from the landfall(s) to the onshore substations;
- Onshore substations co-located on one site;
- Underground grid connection cables (connecting the onshore substations to the grid connection point at SSEN Netherton Hub); and
- Tie-in to the grid connection point (SSEN substation at the Netherton Hub, which is a separate project and does not form part of the current consenting applications.

The EIAR indicates there are three proposed landfall locations - Scotstown Landfall, Lunderton North Landfall and Lunderton South Landfall. All three will result in a need to cross the A90(T).

Assessment of Environmental Impacts

Chapter 26 of the EIAR presents the assessment of Traffic and Transport. This states that the assessment has been carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) (now Institute of Sustainability and Environmental Professionals (ISEP)) Guidelines, entitled Environmental Assessment of Traffic and Movement (July 2023).

These specify that road links should be taken forward for further assessment where the following two rules are breached:

- Rule 1: Include road links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)
- Rule 2: Include road links of high sensitivity where traffic flows have increased by 10% or more.

Chapter 26 states that all construction traffic will use the A90(T) to access the landfall areas, onshore substations and onshore export cable construction working areas, therefore, the study area includes the A90(T), A950 and various 'B' and 'C' roads in the area. Transport Scotland considers this appropriate.

We note that construction of the Project is anticipated to commence in 2030, with the first phase becoming fully operational by 2037. The second phase of the Project would become fully operational by 2040 and the third phase by 2043. The peak year of construction of onshore infrastructure is anticipated to be in the second year, i.e. 2031.

It is also noted that due to the rural nature of the project, the Applicant considers it highly unlikely that construction traffic will have a significant effect on the surrounding local road network with respect to traffic flows both in isolation and cumulatively. It is, therefore, considered that detailed junction capacity assessments are not required and have subsequently not been carried out. Transport Scotland concurs with this approach.

Chapter 26 states that base traffic has been obtained using a combination of 2023 ATC survey data and targeted site surveys where existing data was incomplete or outdated. Data for the A90(T) has been obtained at 4 locations, with 3 DfT sites and one Traffic Scotland counter being utilised. The resulting Existing Annual Average Daily (AADT) two-way traffic flows are presented in Table 26.6, with the 12-hour Annual Average Daily two-way Traffic Flows being presented in Table 26.7.

To assess the construction stage impact, future baseline traffic (2031) has been determined by applying TEMPro growth factors to the existing traffic flows. The resulting 2031 base traffic flows are presented in Table 26.10.

The total peak construction traffic associated with onshore infrastructure delivery is presented in Table 26.14, where it can be seen that there will be 297 daily LCVs and 245 HGVs on three of the A90(T) locations, with the fourth location experiencing 0 LCVs and 331 HGVs.

Table 26.22 presents the results of the Construction Traffic Impact Summary. This demonstrates that at all four A90(T) receptors, the percentage increase in HGV traffic will exceed the 30% threshold as indicated within the IEMA (ISEP) Guidelines, indicating that all four locations require further assessment. A Road Capacity Assessment has been provided which demonstrates that the four trunk road locations have ample spare capacity, with the lowest result being 78%. Transport Scotland is, therefore, satisfied that the increase in traffic at these locations would not result in noticeable change on road capacity.

As per the IEMA (ISEP) Guidelines, a further assessment of Severance, Road vehicle driver and passenger delay, Non-Motorised User delay and amenity, Fear and intimidation, and Road user and pedestrian safety has been carried out. The assessment indicates that there will be embedded environmental measures, designed to mitigate the impact of construction related traffic. In addition, an Outline Construction Traffic Management Plan has been produced, also designed to mitigate any impacts. The results of the assessment are summarised in Table 26.27, where it is demonstrated that the residual impacts will be either “Minor adverse and Not Significant” or “Negligible and Not Significant”. Transport Scotland is, therefore, satisfied that with the implementation of a CTMP, the impact of the construction related traffic can be appropriately managed.

We would, however, state that with regard to any proposed crossing of the A90(T), any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the Area Manager for the A90(T) who is Paul Anderson who can be contacted at [Redacted]

Abnormal Loads Assessment

An Abnormal Load Route Assessment (ALRA) has been prepared and is included within Volume 3, Appendix 26.2. This indicates that construction of the project will generate abnormal load movements primarily related to the transportation of cable drums, transformers and HDD (or similar trenchless technique) rigs. The largest component will be the transformers, and there will be multiple transformers required at the onshore substations.

We note that while the origin of the AL deliveries is unknown, it is anticipated that these would be delivered along the trunk road network via the most suitable route. It has been assumed that all ALs, except for the transformer, will route from the A90(T) south of Peterhead to the access points, with the transformer assumed to be delivered by sea to the South Base port in Peterhead to the onshore substation via the trunk road network.

This proposed approach results in the HDD rigs and cable drums will require to cross Inverugie Bridge, located along the A90(T) northwest of Peterhead. This bridge has a stated weight restriction and the ALRA indicates that this is likely to require reinforcement works prior to any AL deliveries. We would again state that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the Area Manager and we would encourage early dialogue with Paul Anderson to discuss this matter.

Swept Path Analysis has been undertaken along the AL delivery routes and this has been utilised to identify any Points of Interest (POIs).

The results of this assessment are presented in Table 5.2 - Abnormal load assessment summary where it is demonstrated that there are trunk road locations where multiple over-sail areas will be required, as well as junction widening. Any such amendments will require to be agreed with Paul Anderson.

Conclusions

Based on the review undertaken, we can confirm that we are satisfied with the submitted EIAR and we have no objection to the development in terms of environmental impacts on the trunk road network. We would, however, request that the following conditions be attached to any consent that may be granted:

- Condition 1: Prior to commencement of abnormal deliveries to site, the proposed route for any abnormal loads on the trunk road network must be submitted to and approved by the Planning Authority, in consultation with Transport Scotland as the trunk roads authority.

Reason: To minimise interference and maintain the safety and free flow of traffic on the Trunk Road as a result of the traffic moving to and from the development.

- Condition 2: Prior to the movement of any abnormal load, any accommodation measures required on the trunk road network, including the removal of street furniture, junction widening and traffic management must be approved and implemented to the satisfaction of the Planning Authority, in consultation with Transport Scotland.

Reason: To minimise interference and maintain the safety and free flow of traffic on the Trunk Road as a result of the traffic moving to and from the development.

- Condition 3: Prior to the movement of any components and/or construction materials, any additional signing or temporary traffic control measures deemed necessary on the trunk road network due to the size or length of any loads being transported must be undertaken by a recognised QA traffic management consultant, to be approved by Transport Scotland.

Reason: To ensure that the transportation of any components/materials will not have any detrimental effect on the road and structures along the route.

- Condition 4: Prior to commencement of the development, a Construction Traffic Management Plan (CTMP) shall be submitted to, and approved by, the Planning Authority, after consultation with Transport Scotland. Thereafter, all construction traffic associated with the development shall conform to the requirements of the agreed Plan.

Reason: To mitigate the adverse impact of construction traffic on the safe and efficient operation of the trunk road network.

In addition to the above Conditions, the applicant should be informed of the following advisory notes setting out requirements relating to works within the trunk road boundary:

- I. The applicant should be informed that the granting of planning consent does not carry with it the right to carry out works within the trunk road boundary and that permission must be granted by Transport Scotland Roads Directorate.

- II. Trunk road modification works shall, in all respects, comply with the Design Manual for Roads and Bridges and the Specification for Highway Works published by HMSO. The developer shall issue a certificate to that effect, signed by the design organisation.
- III. Trunk road modifications shall, in all respects, be designed and constructed to arrangements that comply with the Disability Discrimination Act: Good Practice Guide for Roads published by Transport Scotland. The developer shall provide written confirmation of this, signed by the design organisation.
- IV. The road works which are required due to the above Conditions will require a Road Safety Audit as specified by the Design Manual for Roads and Bridges.
- V. Any trunk road works will necessitate a Minute of Agreement with the Trunk Roads Authority prior to commencement.
- VI. To obtain permission to work within the trunk road boundary the developer should contact the Area Manager through the general contact number 0141 272 7100.
- VII. The Operating Company has responsibility for co-ordination and supervision of works and after permission has been granted it is the developer's contractor's responsibility to liaise with the Operating Company during the construction period to ensure all necessary permissions are obtained.

I trust that the above is satisfactory but should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office can assist on 0141 343 9636.

Yours faithfully

[Redacted]

Iain Clement

**Transport Scotland
Roads Delivery and Operations**

Alan DeVenny – SYSTRA Ltd.

UK Chamber of Shipping ("UKCoS")

From: [Redacted]
To: [MD Marine Renewables](#)
Cc: [Redacted]
Subject: RE: 00011544, 00011545, 00011546 & 00011547 - MarramWind Ltd – MarramWind Offshore Wind Farm – EIA Section 36 consent and Marine Licence Applications - Consultation – Response Required by 6 March 2026
Date: 06 March 2026 18:21:50
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Dear Marine Directorate,

Thank you for the opportunity to provide comment on the Section 36 and Marine Licence application for MarramWind.

The Chamber has been engaged by the developer and their risk consultants during the consenting phase at Scoping and via the NRA process, and most recently met with them on 26 February to discuss the EIA's analysis of impacts to shipping and navigation from the proposed development.

From that engagement and from review of the EIA Chapters, the Chamber provides the following comments:

Wet Storage

The Chamber notes the developer's assumption regarding wet storage, specifically that wet storage of assembled WTGs will occur within port limits. The Chamber recognises that this is the standard response from floating offshore wind developers and acknowledges that in such instances where wet storage is available in port limits that it would be the responsibility of the relevant port authority to conduct its own risk assessment regarding wet storage operations.

It is however in the Chamber's view that with the number of floating offshore wind developments and accordingly the cumulative number of WTGs progressing through the consenting process in the UK, that it is no longer realistic for developers to assume that wet storage will be within port limits. Port limits are restricted in their available space for such devices, in this instance expected to be 100m x 120m in size with requirements for mooring arrangements and anchor spread severely limiting the available space for storage of WTGs prior to deployment or during periods of major maintenance. Furthermore, use of wet storage in port limits is likely to directly impact upon available anchoring and safe sheltering searoom for vessels, of which is a growing concern, not least as the mooring arrangements for floating WTGs in wet storage areas are so unclear.

The Chamber recognises that the Project has chosen to scope out wet storage from the risk assessment, as every other developer chooses to do at Section 36. Whilst this has become commonplace, it overlooks what is a significant operational, technical, safety and spatial challenge that floating offshore wind present. This challenge needs addressing either at a holistic cumulative level or at an individual project level by requiring the Rochdale Envelope of the project specification to be more tightly defined and therefore able to be commented upon.

Construction Phases

The Chamber wishes to better understand how the offshore construction phase

intending to be carried out continuously over three phases and potentially lasting up to 12 years will be managed from a lighting and marking perspective. In particular whether the entire PDA will be buoyed and marked off for the duration of the construction period or whether this will be incremental.

The Chamber has requested detail on the sequencing of the phases and respective layouts to understand impact to navigation, but understand from the developer that such detail has not been decided and will be considered post consent. Whilst the Chamber acknowledges that layouts as presented in the NRA are indicative worst case, they do not show phases and this provides some navigational concern for the construction phase as to safe vessel routing.

Operational Lifetime & Decommissioning

The project asserts that it will have a maximum 35-year operational lifetime at the O&M stage. The Chamber wishes to understand whether this operational phase is started from when the first phase of the development becomes operational, or whether each phase has an operational lifetime from the point of becoming operational. Such detail was able to be

The Chamber notes from the EIA that “the decommissioning duration of the offshore infrastructure is anticipated to take three years.” The Chamber would like to know whether this is from the first phase of the development reaching its maximum operational lifetime or whether three years is expected for each phase. Such clarity was not attainable from the EIA chapters.

Loss of Station

The project has defined Loss of Station as “*In the event that the mooring system holding a floating unit fails, the floating substructure may experience loss of station and become a floating hazard to passing vessels.*”

The Chamber would assert that a loss of station also results in floating hazard to the other WTGs in the development and that a significant “ricochet” effect could be experienced within the development, which could be highly serious.

The Chamber notes that whilst loss of station has been considered, loss of tow has not and that given the significant operational movement of WTGs to and from the development, depending on the location of the wet storage areas (as yet unknown), this potentially poses a meaningful risk to surface navigation that has not been considered.

The Chamber notes that the NRA states that during the construction stage “*a project vessel would be able to respond in a timely manner ensuring a loss of station event does not occur and appropriate arrangements are taken which may include towing the floating unit off-site*”. The Chamber admires the confidence on the mitigation stated but queries whether such confidence is realistic given the scale of the WTGs and operational experience from the shipping industry in reconnecting to drifting assets, in particular in adverse weather.

The Chamber has requested to review the emergency response and towing plans for such an incident of loss of tow, partial or complete breakout, but understands from the developer that such plans are not developed and will be dealt with post consent due to the broadness of the Rochdale Envelope, the uncertainty of assets that will be used, and feasibility of what intervention is possible. The reliance upon development of plans

post consent when there is limited consultation out with the regulator and not necessary with industry expertise is a concern that the Chamber raises not just with this project but broadly across floating offshore projects progressing through consenting.

Marking of Charts

The Chamber notes that Appropriate marking on Admiralty Charts is declared as an embedded mitigation measure. Whilst this is correct, it has not yet been determined what the appropriate marking will be by the UKHO and whilst this is unknown by the industry, concern exists that the varied mooring and inter-array cabling arrangements for floating WTGs may not provide the granularity of detail for navigational or fishing industries to be able to fully use the area safely. This is particularly the case when it comes to fishing, which if entirely marginalised from the development area, then leads to greater interaction with commercial shipping with resulting increase in navigational risk for both parties.

In summary, the Chamber is concerned that with floating developments, due to the increased uncertainty around their design and deployment, that an increasing number of important aspects are being dealt with post consent, without presenting the necessary detail to stakeholders/receptors to comment upon at consenting.

The Chamber hopes these comments are of use to the Marine Directorate and would be happy to expand upon if merited.

Yours faithfully,

Robert

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