

Finding information in this representations document

Quick guide for consultation representation PDFs

1. Search the PDF using Ctrl + F

- 1. Open the PDF:** Open this representations document in your usual PDF viewer or web browser.
- 2. Press Ctrl + F:** Hold the Ctrl key and press F. A search box will appear. On a Mac, use Command + F.
- 3. Enter your search term:** Type a word, organisation name, reference number or other phrase you want to find.
- 4. Move through the results:** Press Enter, or use the next/previous arrows beside the search box, to move between each match.

2. Jump between representations or sections

PDF navigation can be used to move directly to a particular representation or section without scrolling through the whole document.

- 1. Open the navigation panel:** Look for the Bookmarks, Contents or Navigation icon, usually at the left-hand side of the PDF viewer.
- 2. Choose a section:** Select the relevant bookmark or heading to jump directly to that part of the document.
- 3. Return to the navigation panel:** Use the panel at any time to move to another representation or section.

Tip: For the quickest results, use the navigation panel to reach the relevant representation, then use Ctrl + F to find specific words or phrases.

Aberdeenshire Council

From: Redacted
To: Redacted
Cc: [MD Marine Renewables](#)
Subject: Buchan Offshore Windfarm - Additional Information
Date: 10 July 2026 14:59:36
Attachments: [image001.png](#)

Your Ref: **00011358 / 00011359**

Our Ref: **ENQ/2025/1195**

Good Afternoon,

Further to your email of 7th July I write to confirm that Aberdeenshire Council have no comments on the AEIAR provided in relation to the above development.

Kind Regards,

Stuart Newlands
Planner
Energy Team
Planning and Economy
Environment and Infrastructure Services
Aberdeenshire Council
Skype : **Redacted**
E-Mail: **Redacted**
Team E-Mail: energy.planning@aberdeenshire.gov.uk

Please note normal working hours-Monday to Friday 9am- 5pm

Please remember to submit all planning applications, including revised drawings and additional supporting information via the [National ePlanning Portal](#)

Website: <https://www.aberdeenshire.gov.uk/planning/>

Your feedback is important to us and helps us to improve our service – we value your [comments](#).

Freedom of Information request: Please send your enquiry to foi@aberdeenshire.gov.uk



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presented are solely those of the e-mail's author and do not necessarily represent those of Aberdeenshire Council.

Dh'fhaodadh fiosrachadh sochairichte, a tha a-mhàin airson an neach ris a bheil am post-dealain air a chur, a bhith an seo. Ma tha thu air am post-dealain fhaighinn mar mhearachd, gabh ar leisgeul agus cuir fios chun an neach a chuir am post-dealain agus dubh às am post-dealain an dèidh sin. 'S e beachdan an neach a chuir am post-dealain a tha ann an gin sam bith a thèid a chur an cèill agus chan eil e a' ciallachadh gu bheil iad a' riochdachadh beachdan Chomhairle Siorrachd Obar Dheathain.

www.aberdeenshire.gov.uk

Department of Agriculture, Environment and Rural Affairs

00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response

Inland Fisheries

Inland Fisheries have no specific comments to make on this proposal and recognise that there is no direct impact on DAERA Inland Fisheries interests, however we would make the following comments on offshore renewables in general;

Available evidence suggests that offshore renewable energy developments may affect marine ecosystems through underwater noise, electromagnetic fields (EMFs), habitat alteration, increased vessel activity, and changes to predator–prey interactions. For Atlantic salmon, the greatest potential impacts are associated with the construction phase, particularly pile-driving noise, which may disrupt behaviour, migration, and orientation. Uncertainty also remains regarding the extent to which EMFs from subsea cables may affect salmon navigation and the cumulative effects of multiple developments on migration routes. Turbine foundations can alter habitats and may attract predators, potentially increasing predation risk for migrating salmon, although evidence for these effects remains limited. Overall, a precautionary approach is warranted, including careful site selection, effective mitigation measures, monitoring, and adaptive management to minimise potential risks to Atlantic salmon and the wider marine environment.

Marine Licensing

Marine Licensing Branch have no comment to make at this stage. As the Regulatory Authority we will only comment on individual projects and on a case-by-case basis.

Historic Environment Scotland

By email to:
MD.MarineRenewables@gov.scot

Marine Directorate (Marine Renewables)
Marine Laboratory
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300067419
Your ref: 00011358 / 00011359
18 August 2026

Dear Marine Directorate

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
Buchan Offshore Wind Farm
Additional information

Thank you for consulting us on this additional information, which we received on 07 July 2026. We have reviewed the submissions and considered the proposals 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.

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 Environmental Impact Assessment (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.

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

We have considered the information received and do not have any comments to make on 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.

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 Adrian Lee at Redacted .

Yours sincerely

Historic Environment Scotland

Maritime and Coastguard Agency

From: [navigation.safety](#)
To: [MD Marine Renewables](#)
Cc: Redacted ;Redacted;Redacted;Redacted;Redacted;Redacted ;Redacted ;
Redacted
Subject: RE: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026
Date: 14 August 2026 12:20:05
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Good afternoon, Iain.

Thank you for your correspondence regarding the additional information provided by Buchan Offshore Wind Limited regarding the Buchan Offshore Wind Farm.

After review of the additional documentation in your email, we note that it is not generally in regard to Shipping and Navigation and as a result, likely to have only a negligible impact. As such, our current position on the project which was submitted on 12th September 2025, has not changed and we have no further comment at this stage.

If you have any further questions regarding this response, then please do get in touch.

Kind regards,

Vaughan.

Vaughan Jackson

Offshore Renewables Project Lead
Marine Safety and PNT Services



Maritime &
Coastguard
Agency

Redacted
Redacted

Maritime & Coastguard Agency

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



Safer Lives, Safer Ships, Cleaner Seas
www.gov.uk/mca

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>

Sent: 07 July 2026 10:12

To: MD.MarineRenewables@gov.scot

Cc: ^{Redacted} ;Redacted ;Redacted

Subject: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026

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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

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The Marine Works (Environmental Impact Assessment) Regulations 2007 (*“the MW EIA 2017 Regs”*)

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Further to the consultation on the applications and EIA Report issued on 19 August 2025, the Applicant has now submitted new documents and additional information as follows:

- [Overarching Acronyms](#)
- [Overarching Glossary](#)
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- [Chapter 2: Physical Processes](#)
- [Chapter 3: Fish and Shellfish](#)
- [Chapter 4: Offshore Ornithology](#)
- [Chapter 5: Marine Mammals and Other Megafauna](#)
- [Chapter 6: Shadow Derogation](#)
- [Appendix 4.2: Ornithology Incombination PVA Selection Tool](#)
- [Appendix 5.2: iPCoD Piling Scenario](#)

In accordance with the MW EIA 2017 Regs, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: <https://marine.gov.scot/?q=node/23694>. The information provided in relation to the project including all other environmental topic assessments other than physical processes, fish and shellfish, offshore ornithology, marine mammals and other megafauna and its shadow derogation case remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 18 August 2026. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team,
Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

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Innovation



Collaboration



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Moray Council

From: Redacted
To: [MD Marine Renewables](#)
Subject: RE: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026
Date: 22 July 2026 11:17:37
Attachments: [image002.png](#)
[image003.png](#)

Good Morning

Thank you for your email. I cannot see any record of Moray Council having been consulted on this proposal when initially submitted, however I can confirm given the distance between the proposal and Moray Council's jurisdiction, and our interests, that Moray Council have no comments to make on the submitted additional information.

Many thanks

Andrew

Andrew Miller

Senior Planning Officer | Growth, Planning and Climate
[news](#) | [website](#) | [Facebook](#) | [Instagram](#) | [YouTube](#)

Redacted | Office Direct Dial - 01343 563274 | Mobile - Redacted

Work pattern: Full time Monday – Friday, Hybrid Elgin HQ/Home



From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>

Sent: 07 July 2026 10:12

To: MD.MarineRenewables@gov.scot

Cc: Redacted ; Redacted ; Redacted

Subject: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026

Warning. This email contains web links and originates from outside of the Moray Council network.
You should only click on these links if you are certain that the email is genuine and the content is safe.

Dear Sir/Madam,

ELECTRICITY ACT 1989

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The Electricity (Applications for Consent) Regulations 1990

MARINE (SCOTLAND) ACT 2010

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Further to the consultation on the applications and EIA Report issued on 19 August 2025, the Applicant has now submitted new documents and additional information as follows:

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- [Overarching Glossary](#)
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- [Chapter 6: Shadow Derogation](#)
- [Appendix 4.2: Ornithology Incombination PVA Selection Tool](#)
- [Appendix 5.2: iPCoD Piling Scenario](#)

In accordance with the MW EIA 2017 Regs, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: <https://marine.gov.scot/?q=node/23694>. The information provided in relation to the project including all other environmental topic assessments other than physical processes, fish and shellfish, offshore ornithology, marine mammals and other megafauna and its shadow derogation case remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 18 August 2026. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald

**Marine Licensing & Consenting Casework Officer, Licensing Operations Team,
Marine Directorate**

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

M: Redacted | E: Redacted

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National Parks and Wildlife Service

From: [Housing Manager DAU](#)
To: [MD Marine Renewables](#)
Subject: FW: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026
Date: 19 August 2026 15:37:22
Attachments: [image001.png](#)
[image002.png](#)

Good afternoon,

Further to your below email, which was forwarded by the NPWS Info email address, I wish to confirm that this Department will not be issuing a response to this consultation.

Kind Regards
Sinéad

—
Sinéad O' Brien
Executive Officer

—
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90

From: NPWS Info <info@npws.gov.ie>
Sent: Wednesday 19 August 2026 14:51
To: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Subject: FW: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026

Hi team,

Please, see below for your attention.

Kind regards,

Cesar Rojas.
NPWS Corporate Affairs.

—
An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage

An tSeirbhis Páirceanna Náisiúnta agus Fiadhúlra
National Parks and Wildlife Service

90 Sráid an Rí Thuaidh, Margadh na Feirme, Baile Átha Cliath 7, D07 N7CV



An tSeirbhís Páirceanna Náisiúnta
agus Fiadhúlra
National Parks and Wildlife Service

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: Wednesday 19 August 2026 14:49
To: NPWS Info <info@npws.gov.ie>; NPWS Info <info@npws.gov.ie>
Cc: Redacted ; Redacted ; Redacted
Subject: RE: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026

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Good afternoon,

The consultation period for the proposal described below ended on Tuesday 18 August 2026, however MD-LOT has not received a response from your organisation. As a statutory consultee, if you could please submit a response or confirmation of nil return that would be much appreciated.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team,
Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

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From: NPWS Info <info@npws.gov.ie>
Sent: 07 July 2026 10:19

To: MD Marine Renewables <MD.MarineRenewables@gov.scot>

Subject: RE: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026

Hello Iain,

Thank you for your email below which we acknowledge receipt of.

I can advise it has been forwarded to the relevant team for their consideration.

Kind regards,

Cesar Rojas.

NPWS Corporate Affairs.

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage

An tSeirbhís Páirceanna Náisiúnta agus Fiadhúlra
National Parks and Wildlife Service

90 Sráid an Rí Thuaidh, Margadh na Feirme, Baile Átha Cliath 7, D07 N7CV
90 King Street North, Smithfield, Dublin 7, D07 N7CV



**An tSeirbhís Páirceanna Náisiúnta
agus Fiadhúlra**
National Parks and Wildlife Service

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>

Sent: Tuesday 7 July 2026 10:12

To: MD.MarineRenewables@gov.scot

Cc: ^{Redacted} ; Redacted ; Redacted

Subject: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026

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Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team,
Marine Directorate
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

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Natural England

From: [SM-Defra-Plan Cons Area Team \(Northumbria\) \(NE\)](#)
To: [MD Marine Renewables](#)
Subject: RE: 2026-08-18 552783 Buchan Offshore Wind Limited - Buchan Offshore Wind - Additional Information Consultation (Scottish Government) 00011358 / 00011359
Date: 21 July 2026 16:14:28
Attachments: [image001.png](#)

Dear Iain,

Thank you for this consultation.

We have no further comment.

Best wishes.

Ruth Cantrell
Marine Senior Adviser,
Natural England

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 07 July 2026 10:12
To: MD.MarineRenewables@gov.scot
Cc: Redacted ; Redacted ; Redacted
Subject: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026

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Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team,
Marine Directorate
 Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
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Natural Resources Wales

From: Redacted
To: [MD Marine Renewables](#)
Cc: Redacted ; Redacted ; Redacted ; [Marine Area Advice and Management Team](#)
Subject: RE: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026
Date: 30 July 2026 13:19:45
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)

Good afternoon,

Many thanks for your consultation below.

Considering the location of the Buchan Offshore Wind Farm, Natural Resources Wales (Advisory) conclude that the project is unlikely to significantly impact Welsh designated sites, and we have taken the decision to not provide detailed advice on this application at this stage. Accordingly, we defer to NatureScot as the Statutory Nature Conservation Body for Scotland.

Please do get in touch if we can be of any further assistance.

Kind regards,
Delyth

Delyth Rowlands

Senior Marine Advisor / Uwch Gynghorydd Morol

Gwasanaeth Morol / Marine Service

0300 065 5265

Hi / Hithau / She / Her



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

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



From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>

Sent: 07 July 2026 10:12

To: MD.MarineRenewables@gov.scot

Cc: Redacted Redacted ; Redacted

Subject: 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026

Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

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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 (*"the MW EIA 2017 Regs"*)

00011358 – 00011359 – Buchan Offshore Wind Limited – Buchan Offshore Wind – approximately 75 km off the coast of Aberdeenshire

On 11 August 2025 Buchan Offshore Wind Limited ("the Applicant") submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Buchan Offshore Wind farm.

Further to the consultation on the applications and EIA Report issued on 19 August 2025, the Applicant has now submitted new documents and additional information as follows:

- [Overarching Acronyms](#)
- [Overarching Glossary](#)
- [Chapter 1: Introduction](#)
- [Chapter 2: Physical Processes](#)
- [Chapter 3: Fish and Shellfish](#)
- [Chapter 4: Offshore Ornithology](#)
- [Chapter 5: Marine Mammals and Other Megafauna](#)
- [Chapter 6: Shadow Derogation](#)
- [Appendix 4.2: Ornithology Incombination PVA Selection Tool](#)
- [Appendix 5.2: iPCoD Piling Scenario](#)

In accordance with the MW EIA 2017 Regs, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: <https://marine.gov.scot/?q=node/23694>. The information provided in relation to the project including all other environmental topic assessments other than physical processes, fish and shellfish, offshore ornithology, marine mammals and other megafauna and its shadow derogation case remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 18 August 2026. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald

Marine Licensing & Consenting Casework Officer, Licensing Operations Team, Marine Directorate

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

M: Redacted | E: Redacted

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NatureScot

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

21 September 2026

Our ref: CNS REN OSWF NE8 -
Buchan

Dear Iain MacDonald,

BUCHAN OFFSHORE WIND FARM – ADDITIONAL ENVIRONMENTAL INFORMATION

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 TO CONSTRUCT AND OPERATE THE BUCHAN OFFSHORE WINDFARM, APPROXIMATELY 75 KM OFF THE COAST OF ABERDEENSHIRE

Project Overview

Thank you for consulting us on the Additional Environmental Information (AEI) submitted for the proposed Buchan Offshore Wind Farm. This follows on from the original Application consultation on 19 August 2025 and MD-LOT issuing a Request for Additional Environmental Information (AEI) to the Applicant on 18 December 2025.

This AEI request was informed by consultation responses from NatureScot and Marine Directorate – Science, Evidence, Data and Digital (MD-SEDD).

NatureScot advice

We have continued to engage with the Applicant since the EIA R, through a series of post-submission meetings and correspondence and to reach consensus on the assessment methodologies required and information to be included in the submission of AEI.

We thank and welcome the effort undertaken by the Applicant and their consultants in engaging with us to address the issues raised in our previous advice on the original Application.

Offshore ornithology

The AEI Report has been prepared to provide targeted additional information in response to Requests for Additional Environmental Information (RAEI) received from MD-LOT.

The AEI Report provides targeted ornithological additional information related to:

- distributional responses
- collision risk modelling
- sabbatical birds
- apportioning
- project alone PVAs
- in-combination PVAs
- cumulative effects on great black-backed gulls.

The topics covered address the offshore ornithology concerns raised by NatureScot in our advice issued on 01 October 2025

Offshore ornithology – RIAA

As a result of revisions to the ornithology assessment the predicted impacts to guillemot, razorbill, herring gull, kittiwake and gannet at relevant SPAs have been updated within the AEI Report. PVA re-screening has been undertaken using updated predicted impacts.

Proposal alone assessment of Adverse Effect on Site Integrity (AEoSI)

For kittiwake, razorbill and gannet updated PVAs were not required. We support the Applicant's conclusion of **No AEoSI** for these species at all sites assessed, for project alone impacts. As such, there is no change to our conclusions as presented within our previous advice.

Project alone PVAs have been presented for guillemot and herring gull. Following the provision of this AEI Report, we support the conclusions of **No AEoSI** for guillemot and herring gull for all sites assessed.

In-combination assessment of AEoSI

An updated version of the in-combination assessment approach and PVA as developed by the Muir Mhòr, Ossian and Caledonia projects has been applied to kittiwake, herring gull, guillemot, razorbill, puffin and gannet.

Following the provision of AEI Report we conclude **AEOSI in-combination** with other offshore wind farm projects for **kittiwake** at:

- Calf of Eday SPA,
- Hermaness, Saxa Vord & Valla Field SPA,
- Noss SPA and
- Rousay SPA.

However, we note that although the in-combination impact over the lifetime of the project is small, they should be considered in the overall compensation measures design for kittiwakes.

We are **Unable to conclude No AEoSI in-combination** with other offshore wind farm projects for:

- Puffin at Hoy SPA.

We consider the contribution of the project to the in-combination impact over the lifetime of the project to be a small but measurable contribution, which will require compensation.

Offshore ornithology - EIA

In-line with our advice on the original Application, the Applicant has undertaken cumulative assessment by PVA for great black-backed gull.

We conclude that the cumulative effects on great black-backed gull in the regional population would result in a **Major Adverse** impact, and the impact would therefore be **Significant** in EIA terms. As such, mitigation will be required.

The Applicant recognises that cumulative impacts on great black-backed gull are significant in EIA terms and sets out proposed measures. We advise that further work will be required in relation to the proposed mitigation, this can also be considered as part of compensation measures if relevant, we provide further advice in **Appendix A**.

Marine mammals

We welcome the Applicant's clarifications and additional information provided. The focus of the re-assessment is disturbance from piling activities on the Southern Trench NCMPA and disturbance from piling and non-piling activities in terms of cumulative effects assessment.

Marine Mammals - EIA

For the Proposed Development alone based on updated information in the AEI Report, we conclude **Significant** impacts to minke whale and offshore bottlenose dolphins.

For the Proposed Development cumulatively with other plans and projects, we conclude:

- **Significant impacts** in EIA terms for disturbance from piling for minke whale, inshore bottlenose dolphin, offshore bottlenose dolphin, Risso's dolphin, white-beaked dolphin, harbour porpoise and grey seal.
- Disturbance from non-piling activities as **Not Significant**.

Marine Mammals – Southern Trench NCMPA

For the Proposed Development alone, we are **unable to conclude that the disturbance from piling activities will not hinder the conservation objectives** of the Southern Trench NCMPA.

For the Proposed Development cumulatively with other plans and projects, we conclude that there is **a risk of hindering the conservation objectives** of the Southern Trench NCMPA from disturbance from pile driving activities.

Further advice is provided in **Appendix B**

Fish and shellfish ecology – EIA

In our previous advice, we highlighted issues in relation to potential impacts on herring and sandeel from underwater noise and increases in suspended sediment concentration (SSC).

The AEI Report reasserts the Applicant's position, as presented in the EIA Report, that the development has no significant impact in EIA terms for herring and sandeel - either alone or cumulatively. Although we broadly support most of the conclusions reached regarding significance

in EIA terms and agree with the conclusion of **Not significant for herring, we maintain the following exceptions:**

- **We do not accept the conclusion of Not Significant for sandeel for injury and behaviour changes (TTS) on the basis of the information provided.**
- **We do not consider predicted increases in SSC for sandeel to be Not Significant on the basis of the information provided.**
- **As UXO is considered as part of the “project” for EIA purposes, and no further information is presented, we cannot support a conclusion on Not Significant from UXO clearance.**

Further advice is provided in **Appendix C**

Marine and coastal processes – EIA

As requested within our previous advice, the AEI Report provides clarification in relation to *Sandwave clearance* and *Stratification*, as well as the cumulative assessment.

Sandwave Clearance

we support the Applicant’s conclusions of **Not Significant** in EIA terms.

Stratification

In-line with our previous advice we recommend that **advice should be sought from MD-SEDD on mixing and seasonal stratification.**

Further advice is provided in **Appendix D.**

Our advice above and in the Appendices is based on our review of the AEI submission, along with the relevant documents submitted with the original EIA Report and provide advice relating to:

- Chapter 2: Physical Processes
- Chapter 3: Fish and Shellfish
- Chapter 4: Offshore Ornithology
- Chapter 5: Marine Mammals and Other Megafauna
- Chapter 6: Shadow Derogation
- Appendix 4.2: Ornithology In-combination PVA Selection Tool
- Appendix 5.2: iPCoD Piling Scenario

We hope this advice is helpful. Please contact ben.seaman@nature.scot in the first instance for any further advice, copying in our marine energy mailbox – marineenergy@nature.scot.

Yours sincerely,

Erica Knott

Head of Marine Energy – Sustainable Coasts and Seas.

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NATURESCOT ADVICE ON BUCHAN OFFSHORE WINDFARM

Appendix A – Marine ornithology

The AEI Report provides targeted ornithological additional information related to:

- distributional responses
- collision risk modelling
- sabbatical birds
- apportioning
- project alone PVAs
- in-combination PVAs
- cumulative effects on great black-backed gulls.

The following was requested as AEI:

- An updated assessment of impacts to guillemot through displacement. Due to concerns regarding the use of SeabORD results in the guillemot impact assessment, MD-LOT advises that the Matrix approach alone should be used to re-assess guillemot impacts with new PVAs being undertaken and counterfactuals updated.
- An assessment by PVA of cumulative effects to great black-backed gull through collision, due to the high sensitivity of great black-backed gull to collision impacts.
- In relation to macro-avoidance, clarification on how the macro-avoidance rate has been applied cumulatively.
- In relation to sensitivity, clarification as to why literature sources which are more applicable to the Scottish context e.g. Wade *et al.* (2016) have not been used for the purpose of defining sensitivity.
- Clarification regarding the repeated error in which gannet being referred to twice in a sentence or bullet point e.g. as within paragraphs 9-434 and 9-436.
- Rerun kittiwake and razorbill PVAs using the Matrix approach, with PVA results based on SeabORD and the Matrix approach both presented for these two species.
- The AEI should consider new in-combination data available from projects that have updated their assessments, or new projects that have recently submitted their application(s).

The updated assessment does not re-assess several sites and species; this is as expected given the approach, and as a result, we reiterate our **conclusions for those sites and species as advised previously (see advice issued 01 October 2025 in appendix A):**

- Guillemot at Buchan Ness to Collieston Coast SPA
- Kittiwake at Buchan Ness to Collieston Coast SPA
- Kittiwake at East Caithness Cliffs SPA
- Razorbill at East Caithness Cliffs SPA
- Gannet at Fair Isle SPA
- Gannet at Forth Islands SPA
- Kittiwake at Forth Islands SPA
- Puffin at Forth Islands SPA
- Kittiwake at Fowlsheugh SPA
- Gannet at Hermaness, Saxa Vord & Valla Field SPA
- Kittiwake at North Caithness Cliffs SPA

- Puffin at North Caithness Cliffs SPA
- Gannet at Noss SPA
- Gannet at Sule Skerry and Sule Stack SPA
- Guillemot at Troup, Pennan & Lion's Heads SPA
- Kittiwake at Troup, Pennan & Lion's Heads SPA
- Kittiwake at West Westray SPA

Further clarity on the scope of the AEI was provided in Workshops with NatureScot, where relevant, these have been referenced in our advice. We have split our advice into three key sections:

- **Section 1** - Advice on the changes made in assessment approaches as required by the additional information request.
- **Section 2** - Assessment of the project alone and in-combination impacts on relevant SPAs where these were required because of the changes in the assessments in the AEI R. Our advice on Adverse Effect on Site Integrity (AEoSI) is presented. Assessment of the cumulative effects on great black-backed gull at EIA level and conclusion regarding significance of the effect.
- **Section 3** - Derogation advice

Section 1

A.1 Distributional Responses

A.1.1 SeabORD - distributional responses

As highlighted in our original advice on the 10th October 2025, we had identified issues around the SeabORD outputs used for the assessment for guillemot. It has become apparent, in relation to recent applications, that the use of SeabORD for guillemot where the project is close to the limit of the mean max foraging range for this species is producing unreliable results. For Buchan, our main concern related to SeabORD outputs for guillemot being disproportionately low for some SPAs despite relatively high apportioning rates, i.e. closer SPAs were assessed as having less impact, contrary to what we would expect e.g.

- SeabORD values of 0 mortalities for Buchan Ness to Collieston Coast SPA and 1.7 mortalities for Troup, Pennan & Lion's Heads SPA were of most concern as these two sites are closest to the Project, therefore have the highest apportioning rates. They would also have the highest mortalities if the Matrix approach is used instead.

The Applicant found positive effects from SeabORD at Buchan Ness to Collieston Coast SPA and maintains that positive effects are predicted by SeabORD. It is stated that, in particular circumstances, where projects are at the limits of foraging ranges from some colonies, birds would be predicted to be displaced closer to the colony (rather than displaced to space beyond the wind farm) and will consequently have smaller energetic costs than birds that use the space occupied by the proposed development.

We do not agree as this does not seem to make biological sense - foraging closer to the colony is certainly the preferred scenario if sufficient prey is available there, but this is unrelated to displacement effects from the wind farm. Birds will forage further afield when prey is limited and

may then be displaced beyond the wind farm to find food. It should also be noted that mean max foraging ranges are a guide, not absolutes, with maximum foraging ranges being greater.

It remains our view that SeabORD results as presented are showing unreliable results where species are at the limit of their mean max foraging range. We advise on the use of the matrix approach as more appropriate, especially for guillemot in this case.

A.1.2 Matrix assessment

The effects of displacement to guillemot, razorbill and kittiwake calculated using the matrix displacement approach and the NatureScot apportioning methods are provided in Section 4.3.2.

A.1.2.1 Guillemot

As requested, the Mean Seasonal Peak (MSP) for guillemot has been recalculated so that the same MSP (August 2022) is no longer used in both breeding and non-breeding seasons. In our view, this August peak represents a post-breeding dispersal peak and should therefore only be used in the non-breeding season.

The recalculation results in a reduced displacement impact in the breeding season, while the non-breeding season remains the same. This is as expected.

Using the Matrix approach for displacement assessment has increased the impacts in all seasons when compared with using a combination of SeabORD and the Matrix approach.

A.1.2.2 Razorbill and Kittiwake

Overall, for kittiwake and razorbill, using the matrix approach only, impacts were lower than those using a combination of SeabORD in the breeding season and the matrix approach in other seasons. We advise that by undertaking this approach and the results have not changed our advice and conclusions at the EIA R stage for razorbill and kittiwake.

A.2 Collision risk modelling

A.2.1 Macro avoidance

We requested clarification on whether a macro avoidance rate had been applied for gannet and kittiwake. NatureScot only recommends a 70% macro-avoidance rate for gannet in the non-breeding season and no macro avoidance rate for kittiwake.

The AEI Report confirms that for macro-avoidance no rate was applied for any species, or in any season, in the collision risk assessments. We note that this is more precautionary, and we therefore accept this approach.

A.2.2 Mean CRM outputs

NatureScot did not previously comment on the method the Applicant used to determine predicted collisions, but the Applicant is aware of the Additional Environmental Information Requests to other recent ScotWind applications for the provision of mean predicted collision predictions. This was discussed with NatureScot in a workshop on 31 March 2026 and it was agreed that more details on the approach used and any differences between mean and median CRM results would be provided.

Using the same CRM outputs from Appendix 9.2 of Volume 3 of the EIAR, the mean values have been calculated for each month for each species and are presented in Table 4-17 - Table 4-21 in the AEI.

We note that for kittiwake, gannet, great black-backed gull and herring gull the mean values for predicted collisions are only slightly higher than the median values, and we advise this difference is not significant.

For fulmar the mean prediction collisions were greater than the median values. Annual collisions using the mean value were 3.46 and the median 0.51. The Applicant considers that this is the result of skewed distributions so that the mean is not providing a suitable statistic. As we do not consider fulmar to be particularly vulnerable to collision the lower collision estimate seems more likely. Fulmar is not assessed further in the AEI for collision which we accept.

A.2.3 Sabbatical birds

We maintain our position that sabbaticals should not be removed in the non-breeding season, but only in the breeding season. During the non-breeding season, all birds are non-breeders and so sabbatical birds do not need to be removed from estimated adult mortalities.

While the Applicant does not agree with our approach, the apportioned impacts presented in Section 4.9 have applied the sabbatical rate in the breeding season only.

A.3 Species sensitivity

The Applicant has undertaken a comparison of species sensitivity in Wade *et al.* (2016) with the references used in the Application (Furness & Wade (2013), Bradbury *et al.* (2014) and Furness *et al.* (2013)), which we welcome. It is noted that there are no cases in which a sensitivity score derived from Wade *et al.*, (2016) is more precautionary than the scores used in the original assessment. The Applicant therefore maintains that the conclusions derived from the sensitivity scores used in the EIAR are sufficiently precautionary and remain valid and applicable. We agree with this conclusion.

A.4 Apportioning

In our advice on the EIAR, we noted that any changes made to displacement and collision assessments resulting in changes to impacts would influence apportioning impacts to SPAs. This has been addressed in the AEI Report.

The changes in assessment that have been undertaken in the AEI Report and that have an impact on apportioning are as follows:

- Collision impacts have been changed from median CRM estimates to mean (Section 4.4.4.3 Collision Risk Modelling);
- Displacement impacts, where estimated using SeabORD, have been replaced with matrix-based estimates (Section 4.3 Distributional responses);
- The seasonal definition for guillemot has been changed so the month of August is wholly part of the non-breeding season (Section 4.3.2.1 Guillemot); and
- Sabbatical corrections are only applied to estimated impacts during the breeding season (Section 4.7 Sabbatical Birds).

These changes in assessment are in line with our advice and therefore we welcome the updated apportioning of impacts based on these changes. Guillemot is discussed in more detail in Section A.4.1 (below) this was the species where we had most concern about the displacement assessment.

A.4.1 Guillemot

The impact figures presented in Table 4-25 indicate that apportioned guillemot impacts are greater for:

- Buchan Ness to Collieston Coast SPA, and,
- Troup, Pennan and Lion's Heads SPA

than they were in the RIAA submitted in support of the August 2025 application. We anticipated that these changes made to the displacement assessment approach would result in greater apportionment of impacts to these sites closest to the development.

Table 1: Comparison of AEI R and RIAA guillemot impacts at Buchan Ness to Collieston Coast and Troup, Pennan and Lion's Heads SPAs (low displacement impact followed by high displacement impact)

SPA	Annual impacts to breeding birds AEI R*	Annual impacts to breeding birds RIAA**
Buchan Ness to Collieston Coast	12.3/28.7	5.72/17.16
Troup, Pennan and Lion's Heads	18.2/42.4	10.15/27.06

** Table 4-25*

*** Table 3-15 Appendix 9.4 Ornithological Impact Apportioning, Derivation of Cumulative Impacts and PVA Screening*

Section 2

A.5 Assessment of the project alone and in-combination impacts

We provide advice on the project alone and in combination impacts assessed in the AEI R and present our conclusions of Adverse Effect on Site Integrity (AEoSI).

A.5.1 Project alone PVAs

As the predicted impacts to guillemot, razorbill, herring gull, kittiwake and gannet at relevant SPAs have changed in the AEI R, due to the revision of assessments, project alone PVA re-screening was required using the updated predicted impacts.

Where percentage point changes in adult mortality were equal to or exceeded 0.02 PVAs were requested. This only applied to guillemot and herring gull.

For kittiwake, razorbill and gannet all impacts were below the 0.02 percentage point change threshold and we can conclude no AEoSI for these species at all sites assessed. For these species there is no change from our conclusions in the RIAA.

The results of the project alone PVAs for guillemot and herring gull are summarised below:

Guillemot

The results of the project alone PVAs run for guillemot are shown in Table 2 below, with Counterfactual of Population Size (CPS) values and our conclusions presented. AEoSI conclusions are compared with those in the RIAA.

We can conclude for project alone impacts that, for all sites assessed, there is no AEoSI for guillemot. There is therefore no change to our conclusions on the RIAA.

It is noted that the changes in the AEI assessment result in increased impacts for Buchan Ness to Collieston Coast SPA and Troup, Pennan and Lion's Heads SPA which is what we would expect as these sites are closest to the development. This has implications for compensation measures if these conclusions are also reached in the Appropriate Assessment.

Table 2: PVA results and AEoSI conclusions for guillemot at assessed SPAs. (CPS – low displacement impact followed by high displacement impact)

Site	CPS	AEoSI conclusion AEI R	Change from AEoSI conclusion RIAA?
Buchan Ness to Collieston Coast	0.988 to 0.972	No AEoSI	No
Calf of Eday	0.993 - 0.985	No AEoSI	No
Copinsay	0.987 - 0.971	No AEoSI	No
Fair Isle	0.993 - 0.984	No AEoSI	No
Hoy	0.993 - 0.984	No AEoSI	No
Marwick Head	0.995 - 0.989	No AEoSI	No
Rousay	0.995 - 0.987	No AEoSI	No
Sumburgh Head	0.995 - 0.989	No AEoSI	No
Troup, Pennan and Lion's Heads	0.984 - 0.965	No AEoSI	No
West Westray	0.996 - 0.990	No AEoSI	No

Herring Gull

The results of the project alone PVA run for herring gull are shown in Table 3 below with CPS values and our conclusions presented. AEoSI conclusions are compared with those in the RIAA.

We can conclude for project alone impacts that, for Troup, Pennan and Lion's Head SPA, there is no AEoSI for herring gull. There is therefore no change to our conclusion on the RIAA.

Table 3: PVA results and AEoSI conclusions for herring gull at Troup, Pennan and Lion's Head SPA

Site	CPS	AEoSI conclusion AEI R	Change from AEoSI conclusion RIAA
Troup, Pennan and Lion's Head	0.959	No AEoSI	No

A.5.2 In-combination assessment

The Applicant has taken the approach to in-combination assessment requested by NatureScot (email 02.06.2026) such that an updated version of the in-combination assessment approach and PVA used by the Muir Mhòr, Ossian and Caledonia projects has been applied to kittiwake, herring gull, guillemot, razorbill, puffin and gannet.

It is noted that MD-LOT advised that the Applicant could exclude impacts from consented Scottish projects where there is a conclusion of AEOSI (or unable to conclude no AEOSI) on sites/species which have resulted in the need for compensation.

Appendix 4.2 In combination PVA Selection Tool shows the process followed to select features requiring PVA which we agree with. 24 SPA features were selected for further assessment.

One of the steps in the process is to remove SPA features where AEoSI has already been reached in combination as it is assumed there will automatically be AEoSI for Buchan OFW where it contributes impacts.

As a result of this there are a number of SPA features where NatureScot determined AEoSI in our response to the Application (01/10/25) which have not been revised in the AEI R and our advice for these therefore still stands. These are listed below:

Table 4: SPA features not assessed in the AEI R and where NatureScot concluded AEoSI – this advice has not changed.

SPA	Qualifying species	CPS (with Berwick Bank)*	CPS (without Berwick Bank)*	NatureScot determination of AEoSI
Buchan Ness to Collieston Coast	Guillemot	0.863-0.724	0.871 -0.739	AEoSI
	Kittiwake	0.853-0.811	0.867-0.830	AEoSI
East Caithness Cliffs	Kittiwake	0.800-0.727	0.817-0.748	AEoSI
	Razorbill	0.880-0.777	0.884-0.786	AEoSI
Fair Isle	Gannet	0.927-0.884	0.931-0.888	Unable to conclude no AEoSI
Forth Islands	Kittiwake	0.868-0.826	0.914-0.882	AEoSI with Berwick Bank/ Unable to conclude no AEoSI without Berwick Bank
	Puffin	0.921-0.873	0.994-0.909	Unable to conclude no AEoSI with Berwick Bank No AEoSI without Berwick Bank
	Gannet	0.823-0.749	0.847-0.782	AEoSI
Fowlsheugh	Kittiwake	0.855-0.815	0.902-0.873	AEoSI with Berwick Bank/ Unable to conclude no AEoSI without Berwick Bank
Hermaness, Saxa Vord and Valla Field	Gannet	0.886-0.818	0.890-0.824	AEoSI
North Caithness Cliffs	Puffin	0.798-0.692	0.798-0.690	AEoSI
	Kittiwake	0.846-0.797	0.860-0.817	AEoSI
Noss	Gannet	0.917-0.866	0.919-0.871	Unable to conclude no AEoSI
Sule Skerry and Sule Stack	Gannet	0.901-0.869	0.902-0.870	Unable to conclude no AEoSI
Troup, Pennan and Lion's Heads	Guillemot	0.938-0.862	0.942-0.870	Unable to conclude no AEoSI
	Kittiwake	0.852-0.811	0.866-0.830	AEoSI
West Westray	Kittiwake	0.638-0.522	0.669-0.564	AEoSI

**CPS Counterfactual of population size (35 years) - low displacement mortality rate value followed by high displacement mortality rate value.*

A.5.3 PVA models

Table 4-10 of the AEI provides the 24 SPA features requiring a PVA and shows the % point change in adult mortality which triggers the need for PVA. Table 4-11 shows the input parameters for the PVAs which are acceptable.

However, there is no table provided showing the results of the PVAs and the counterfactuals of population size (CPS) and population growth rate (CGR). This is essential information that has been omitted from the report and has made it more difficult to provide advice on the in- combination assessments

The text states that *'outputs are provided as Appendix 4.2 comprising Microsoft Excel compatible files describing the inputs and outputs for each model run for each SPA qualifying feature. These files are also provided to allow MD-LOT to reach conclusions in their Appropriate Assessment, so no interpretation is provided here.'*

This is incorrect, the excel files are not provided in Appendix 4.2, which is the PVA selection tool spreadsheet. We requested the outputs spreadsheets to be provided (received 26.08.26).

However, no summary of the outputs were presented in the report and it has been necessary to use the raw data to undertake our own assessment and to provide our own summary.

A.5.4 NatureScot Assessment of in-combination impacts on SPA features where PVAs have been undertaken in the AEI Report

A number of features were not assessed in the RIAA, and PVAs not undertaken where the project contribution to the in-combination impacts were less than 0.2 birds/annum. This was based on advice provided prior to the application by NatureScot. In the AEI R assessments have been undertaken for any impact value.

Our assessment of AEoSI are primarily based on the PVA CPS outputs, after 35 years. However, in reaching our conclusions we also consider a range of other factors including:

- CGR outputs and the % decrease in population growth rate
- Status of the population including short and long-term trends
- Condition of the feature
- Species ecology
- Proportional importance of species in Scotland and UK
- Impacts of HPAI and other recent mortality events.

PVAs were undertaken for the following impact pathways:

- Collision
- Distributional responses
- Collision and displacement - combined for gannet and kittiwake only.

All the SPA features assessed met the 0.02 percentage point change in adult mortality and therefore PVAs were required for all features. A summary table of the PVA results for the lifetime of the project (35 years) is provided below, followed by more detail for features where we conclude AEoSI. The summary table includes a comparison with the PVA results in the Application RIAA and highlights any change in NatureScot's conclusions of AEoSI.

It is noted that only one impact scenario was assessed – the high displacement value – in the PVAs.

Table 5: PVA results summary table (35 years)

Species	SPA	% point change	Median CPS in AEI R	Median CPS in RIAA	NS AEoSI conclusion	Change from RIAA conclusion
Guillemot	Calf of Eday	0.111	0.973	0.964	No AEoSI	No
	Fair Isle	0.095	0.977	0.978	No AEoSI	No
	Hoy	0.163	0.96	0.957	No AEoSI	No
	Marwick Head	0.127	0.969	0.965	No AEoSI	No
	Rousay	0.118	0.971	0.966	No AEoSI	No
	Sumburgh Head	0.098	0.977	0.938	No AEoSI	No
	West Westray	0.099	0.976	0.974	No AEoSI	No
Gannet	North Rona & Sule Sgeir	0.072	0.981	No PVA	No AEoSI	Not assessed
Herring gull	Troup, Pennan & Lion's Heads	0.198	0.958	0.945	No AEoSI	No
Kittiwake	Calf of Eday	1.513	0.704	No PVA*	AEoSI	Not assessed
	Cape Wrath	0.076	0.983	No PVA*	No AEoSI	Not assessed
	Foula	0.238	0.934	No PVA*	No AEoSI	Not assessed
	Hermaness, Saxa Vord & Valla Field	1.317	0.667	No PVA*	AEoSI	Not assessed
	Marwick Head	0.126	0.971	No PVA*	No AEoSI	Not assessed
	Noss	1.671	0.6	No PVA*	AEoSI	Not assessed
	Rousay	1.006	0.79	No PVA*	AEoSI	Not assessed
	Sumburgh Head	0.28	0.921	No PVA*	No AEoSI	Not assessed
Puffin	Fair Isle	0.129	0.962	0.989	No AEoSI	No
	Foula	0.277	0.924	No PVA*	No AEoSI	Not assessed
	Hoy	0.445	0.877	0.973	Unable to conclude no AEoSI	Yes
	Noss	0.049	0.987	No PVA*	No AEoSI	Not assessed
	Sule Skerry & Sule Stack	0.192	0.946	0.891	No AEoSI	No
Razorbill	West Westray	0.225	0.94	0.926	No AEoSI	No

* PVAs not undertaken because project contribution was less than 0.2 birds/annum and at the time of application NatureScot advised that in combination assessment/PVA was not required below that level of impact.

Please note our advice on these new assessments highlights both conclusions of no AEoSI and or AEoSI – with one feature / site where our advice also now differs from our application advice – Hoy SPA – puffin where we advise we are unable to conclude no AEoSI.

A.5.5 NatureScot assessment of SPA features where AEoSI was reached for in-combination impacts

Calf of Eday SPA – kittiwake

Table 6: PVA results and AEoSI conclusion for kittiwake at Calf of Eday SPA

Species	Median CPS	Median CGR	AEoSI conclusion
Kittiwake	0.704	0.99	AEoSI

For **Kittiwake**, we conclude AEoSI at Calf of Eday SPA, taking into consideration:

- the very low CPS values representing a population decline of 29.6%
- the low CGR representing a decrease in population growth rate of 1%
- the unfavourable condition of the feature
- a 57% population decline between Seabird 2000 and Seabirds Count.

However, the contribution of the project to the in-combination impact is 0.02 of a bird per annum, which over the lifetime of the project equates 0.7 of a bird.

Hermaness, Saxa Vord & Valla Field SPA – kittiwake

Table 7: PVA results and AEoSI conclusion for kittiwake at Hermaness, Saxa Vord & Valla Field SPA

Species	Median CPS	Median CGR	AEoSI conclusion
Kittiwake	0.667	0.989	AEoSI

For **Kittiwake**, we conclude AEoSI for Hermaness, Saxa Vord & Valla Field SPA, taking into account:

- the very low CPS values representing a population decline of 33.3%
- the low CGR representing a decrease in population growth rate of 1.1%
- the unfavourable condition of the feature
- a 77% population decline between Seabird 2000 and Seabirds Count.

However, the contribution of the project to the in-combination impact is 0.01 of a bird per annum, which over the lifetime of the project equates 0.35 of a bird.

Noss SPA – kittiwake

Table 9: PVA results and AEoSI conclusion for kittiwake at Noss SPA

Species	Median CPS	Median CGR	AEoSI conclusion
Kittiwake	0.6	0.986	AEoSI

For **Kittiwake**, we conclude AEoSI at Noss SPA, taking into account :

- the very low CPS values representing a population decline of 40%
- the low CGR representing a decrease in population growth rate of 1.4%
- the unfavourable condition of the feature
- a 93% population decline between Seabird 2000 and Seabirds Count.

However, the contribution of the project to the in-combination impact is 0.01 of a bird per annum, which over the lifetime of the project equates 0.7 of a bird.

In our advice at EIA R, we concluded adverse effect on Site integrity for Kittiwake. We consider, compensation for kittiwake should take account for the small scale, <1 bird over the operational life span, changes at Noss SPA, Hermaness, Saxa Vord & Valla Field SPA and the Calf of Eday SPA in the overall compensation measures design for kittiwake.

However, Marine Directorate may wish to consider this further in accord with the new Offshore wind - compensating for adverse effects on Protected European Sites: statutory guidance 2026.

Rousay SPA – kittiwake

Table 10: PVA results and AEoSI conclusion for kittiwake at Rousay SPA

Species	Median CPS	Median CGR	AEoSI conclusion
Kittiwake	0.79	0.993	AEoSI

For **Kittiwake**, we conclude AEoSI at Rousay SPA , taking into account:

- the very low CPS values representing a population decline of 21%
- the low CGR representing a decrease in population growth rate of 0.7%
- the unfavourable condition of the feature
- an 88% population decline between Seabird 2000 and Seabirds Count.

However, the contribution of the project to the in-combination impact is 0.04 of a bird per annum, which over the lifetime of the project equates 1.4 birds. This is a small but measurable contribution, which will require compensation

Hoy SPA – Puffin

Table 8: PVA results and AEoSI conclusion for puffin at Hoy SPA

Species	Median CPS	Median CGR	AEoSI conclusion
Puffin	0.877	0.996	Unable to conclude no AEoSI

For **Puffin**, we conclude Unable to conclude No AEoSI at Hoy SPA, considering:

- the low CPS values representing a population decline of 12.3%
- the low CGR representing a decrease in population growth rate of 0.4%
- the unfavourable condition of the feature

The contribution of the project to the incombination impact is 0.2 of a bird per annum, which over the lifetime of the project equates 7 birds. This is a small but measurable contribution, which will require compensation.

A.5.6 Cumulative Effects Assessment (CEA)

Great black-backed gull

Great black-backed gull was not progressed to the CEA in the EIA Report. Within our previous advice, we highlighted the high sensitivity of great black-backed gull to collision and that conclusions of significant cumulative effect have been reached for other offshore wind proposals

for this species, based on a small project alone contributions. Further consideration was therefore required on potential cumulative effects to great black-backed gull through collision. A cumulative assessment using PVA has now been presented in the AEI R.

The cumulative predicted change in the adult survival rate indicates a 1.328 percentage point change and triggers a PVA, as predicted cumulative impacts exceeded the NatureScot advised threshold of a 0.02% point change in adult survival.

Table 11: PVA results for great black-backed gull (35 years)

Project contribution to mortality	PVA results	
	Median CPS	Median CGR
1.0 adult bird/annum (2.85 birds per annum including immatures)	0.564	0.984

We conclude that the cumulative effects on great black-backed gull in the regional population would result in a **Major Adverse** impact, and the impact would therefore be **Significant** in EIA terms. This conclusion is based on:

- The very low CPS values, which represent a decrease in the regional population size after 35 years of 43.6%
- The low CGR values, which represent a decrease in the population growth rate of 1.6% after 35 years
- The status of the great black-backed gull population, with a 63% decrease in Scottish and a 52% decrease in the UK populations between Seabird 2000 and Seabirds count. Great black-backed gulls have continued to decline since Seabirds Count.

Although the project contribution to the cumulative impacts is small at 2.85 adults and immatures per annum, the very low counterfactuals and the status of the great black-backed gull population mean that even a small impact is of concern. As a result, mitigation will be required.

The Applicant recognises that cumulative impacts on great black-backed gull are significant in EIA terms and proposes that this can be mitigated through:

- the embedded mitigation measures proposed in the EIAR
- the derogations proposed for other species (as required as part of the HRA) to reduce impacts from marine plastic pollution, reduction in visitor disturbance in the Buchan Ness to Collieston Coast SPA (where great black-backed gulls nest – noting they are not a feature of the SPA) and marine habitat enhancement

The only embedded mitigation measure designed to reduce impacts on great black-backed gull relates to WTG design and having a 30m Air Gap. While this may be beneficial in helping to reduce the risk of collision by increasing the air gap zone it should be noted that 82.6% of great black-backed gull flights are predicted to be at collision risk height by Bowgen & Cook 2018¹ and that flight heights peak at 25-50m above sea level. In our view this mitigation measure will not be sufficient on its own.

¹ Bowgen, K. & Cook, A. 2018 - Bird Collision Avoidance: Empirical evidence and impact assessments JNCC Report No 614

Further work will be required on the compensation measures proposed to determine their relevance to great black-backed gull, as currently this species is not a focus of the measures described in Chapter 6 Shadow Derogation Case.

A.6 Section 3 - Updated requirement for compensation

The Applicant has updated the level of compensation required for each relevant species based on NatureScot conclusions of AEOSI or was Unable to Conclude No AEOSI at the EIA R stage.

The updated impacts are summarised in Table 12 below:

Table 12: Updated annual and lifetime of the project impacts for features where NatureScot concluded AEOSI or Unable to Conclude No AEOSI.

Species	Mortality -annual (lower/higher)	Mortality – operational life of project (35 years)
Kittiwake	4/5	140/175
Guillemot	31/72	1085/2520
Razorbill	2/3	70/105
Puffin	¾	105/140
Gannet	4/7	140/245

It is noted that throughout Chapter 6 the Applicant states that the impacts from the project are small, noting these identify the predicted annual impacts, In our view, it is worth considering not just the annual impacts from the project but also the impacts over the lifetime of the project, to ensure the overall impact of the proposal is considered when proposing / delivering the compensation measures, especially in regard to guillemot.

The compensation measures which the Applicant proposes to take forward are discussed below.

Measure 1 – Management of marine litter

Since the EIA R was submitted, guidance has now been published by the Scottish Government on the delivery of strategic compensation². We advise consideration of this guidance when developing compensation measures and in particular having regard to the guidance on the tiers.

We can agree that the benefits from marine litter removal are difficult to quantify but it is an accepted pressure on seabirds and its removal would generally be considered beneficial. We also agree that this measure could be beneficial combined with the other measures if they could be shown to be effective, which currently is not the case, as detailed below.

It is noted that the Applicant is unable to find any further evidence of marine litter entanglement for kittiwake, guillemot or razorbill. Instead, plastic ingestion of micro plastics is discussed with evidence provided of ingestion by the target species, which could lead to mortality. It is then noted that by removing macroplastics from habitats used by seabirds, the proposed measure will reduce the source material from which microplastics are generated through fragmentation and degradation. This is a fair statement.

² <https://www.gov.scot/publications/compensating-adverse-effects-offshore-wind-protected-european-sites-scotland-statutory-guidance-2026/pages/1/>

In the Without Prejudice Derogation Case the Applicant presented figures from the NEEOG regional compensation project (Pizzolla *et al.*, 2024³) regarding the benefit from marine litter removal. Rather than respond to NatureScot's comments on this, the Applicant states that the level of compensation required for each species is sufficiently small that empirically measuring the benefit at the scale of compensation required is unlikely to be successful. They consider that for the very small scale of compensation required, contributing to the removal of marine plastic pollution from the habitats used by the species requiring compensation would very likely provide sufficient benefit when combined with the other measures proposed.

Removal of marine litter from gannet nesting colonies

The Applicant presents existing data to estimate the mortality from plastic entanglement at all gannet SPAs in the UK (Table 6-9).

The Applicant considers that there is good evidence that management measures to reduce this impact are likely to be beneficial to gannets and we can agree with this.

The Applicant states that removing marine litter from any of the gannet colonies listed in Table 6-9 would likely be sufficient to compensate for the predicted compensation needed of 4-7 adult birds. While potentially this could be the case, no mechanism for removing marine litter from nest sites is proposed or any acknowledgment that this could be very difficult to do. We note that on Grassholm, entangled birds are rescued but the litter in nests is not removed due to the potential for disturbance and destruction of the nests⁴.

Measure 3 – Additional management measures at protected sites

Reduction of Disturbance from Anthropogenic Sources

Reduction of disturbance is proposed as a compensation measure at Buchan Ness to Collieston Coast SPA.

However, at present no site-specific information is provided to determine:

- if there is a need for the measure i.e whether disturbance is a pressure at Buchan Ness to Collieston Coast SPA
- if disturbance does occur, where in the SPA it occurs, as this is a very extensive linear SPA
- if there is visitor pressure - are the seabird colonies within disturbance zones and which species are vulnerable
- level and type of visitor activity
- what types of visitor management would be appropriate, feasible and effective.

Without any of this information it is difficult to assess whether this measure could be effective in providing compensation benefit at Buchan Ness to Collieston Coast SPA.

The Applicant proposes that pilot studies are completed to inform future baseline studies to determine whether there are anthropogenic disturbance pressures on the relevant features of the

³

Pizzolla, P. Tyler, G. Grant, M. Salmon, W. Harker, J. & Bower, R. 2024. Development of Ornithology Regional Compensation Measures: Ornithology compensation measures. Report to NE / E ScotWind developers group.

⁴ <https://www.audubon.org/magazine/annual-rescue-mission-free-northern-gannets-tangled-plastic-trash>

SPA. Supporting fieldwork is proposed to be undertaken in 2027. This work would make evaluating the measure more achievable.

Estimating potential benefit to visitor management

Predicted benefit to kittiwake and guillemot from visitor management at the Buchan Ness to Collieston Coast SPA is estimated using Beale & Monaghan (2004)⁵ who studied the effects of visitor management at St Abbs Head. Changes in productivity resulting from reducing visitor pressure are measured to estimate benefits. Table 6-13 provides projected numbers of additional pairs of adult kittiwakes and guillemots in the SPA from changes in productivity resulting from visitor management.

While we acknowledge that the approach taken has merit, it is hard to assess how applicable it is to Buchan Ness to Collieston Coast SPA, given the lack of site-specific evidence provided.

The assumptions and limitations of the approach make it likely that the benefits are over-estimated. These include:

- inclusion of the whole SPA populations of kittiwake and guillemot in the model, whereas only certain parts of the SPA and specific sections of the seabird colonies are likely to be subject to visitor pressure
- increases in productivity and population growth will be dependent on other factors besides disturbance, such as food availability
- population expansion can only occur if there is available suitable habitat and currently there is no information provided about this
- the exponential growth in the population seen in Table 6-13 will not occur due to density dependent processes acting on the populations of kittiwake and guillemot.

In view of this, while we agree that anthropogenic disturbance can be a pressure on seabirds, including kittiwake and guillemot, the field work proposed in 2027 will need to consider these aspects to inform whether there is evidence to indicate that disturbance is occurring at Buchan Ness to Collieston Coast SPA, to which species, where, to what extent, and how this might be managed.

Suppression of Predators

Reduction of corvid predation is proposed as a compensation measure at Buchan Ness to Collieston Coast SPA. The Applicant is relying on future pilot studies to determine whether the measure is feasible and likely to be effective in providing compensation benefit. We note our concerns regarding this measure, particularly at this stage where there is no evidence presented to indicate this is a pressure. Further discussion in respect of this measure is required.

⁵ Beale, C.M. and Monaghan, P., 2004. Human disturbance: people as predation-free predators? *Journal of Applied Ecology*, 41: 335-343.

NATURESCOT ADVICE ON BUCHAN OFFSHORE WINDFARM

Appendix B Marine Mammals

We welcome the Additional Environmental Information Report (AEI R) which provides targeted additional information:

- The maximum design scenario including expected durations for each impact.
- In relation to piling parameters and durations, confirmation was requested:
 - On whether concurrent piling between the OSP / IRC and WTGs is likely.
 - As to whether the 1.4km instantaneous PTS value for grey seals is an accurate output from the underwater noise modelling.
 - Of the maximum piling durations used in the modelling for individual piles (WTG anchor and OSP / IRC) as well as total duration and temporal spread across the construction period.
- Use of NatureScot advised flee speeds for low frequency and very high frequency cetaceans, to calculate the number of individuals impacted from cumulative PTS across each of the piling scenarios.
- Further information to better understand the compounding effects of the modifications / assumptions used to include cumulative PTS within the iPCoD modelling and the impact each individual change has on the outputs for each species, particularly for minke whale and harbour porpoise.
- In relation to grey seals, further information to outline each modelling step to clearly understand where and how each assumption / modification influences the change in population trajectory.
- Re-evaluation of the cumulative effects assessment (“CEA”), including assessment through iPCoD modelling.
- In relation to cumulative disturbance from other construction activities including survey equipment/vessels, we outlined the difficulty in supporting the conclusion of ‘Not Significant’ for Construction Impacts 2, 4 and 5 in the CEA. Further clarified to MD-LOT in separate correspondence that this is due to the lack of narrative to support the Applicant’s CEA conclusion and the conclusion relying so heavily on the related project-alone conclusions. For example, the characterisation of the impacts (as outlined in Section 10.9.2; including magnitude and duration of impacts), needs to be assessed at the scale appropriate for a cumulative assessment. There has been no justification provided for how the project-level characterisation of an impact can be used to base the significance of effect for all projects outlined in Table 10-100. As such, MD-LOT require the justification set out in the CEA to be revisited and further explanation provided.
- The Southern Trench ncMPA- the minke whale protected feature reassessment to provide:
 - the percentage area of the Southern Trench ncMPA predicted to be disturbed during pile driving activities, when and for what duration, including a visual representation of disturbance ranges to be provided.
 - the potential impacts to sandeel and herring as key prey species for minke whale as a result of piling activities.

- The percentage area of the Southern Trench ncMPA predicted to be disturbed cumulatively (through a spatial and / or temporal overlap) from pile driving activities from all relevant offshore wind developments.

Additional clarification on the AEI Report was provided and agreed upon post-application and is highlighted in **Table 12**.

Table 12. Clarification provided and agreed upon post-application submission/within AEI R

NatureScot request	Applicants' response	NS conclusion
Clarification is provided to confirm no concurrent piling between the OSP / IRC and WTGs is likely. If concurrent piling is required, then additional modelling will likely be required.	Clarification was provided to NatureScot in the technical clarification letter (BOW-L-0409) confirming that concurrent piling between the Operation Substation Platform (OSP), Intermediate Reactive Compensation (IRC) and Wind Turbine Generators (WTGs) will not be undertaken and was therefore not included within the maximum design scenario. This clarification is repeated within Section 5.3.2 . The concern was addressed and no further clarification was requested.	NatureScot are content with this clarification and do not require any further information.
Clarification is provided to confirm whether the 1.4km value for grey seals is an accurate output from the underwater noise modelling and if so, mitigation measures will need to be updated accordingly.	Clarification was provided to NatureScot in the technical clarification letter (BOW-L-0409) and is repeated in Section 5.3.3 for clarity. The discrepancy was confirmed to be a typographical error and did not affect the assessment conclusions. The concern was therefore addressed.	NatureScot are content with this clarification and do not require any further information.
Clarification on the modelling start year. The iPCoD modelled outputs show results starting from 2036, labelled as piling year 1, however the Project Description states the construction period will begin in 2030 and over a period of up to three years and Table 2-2 of Appendix 10.2 Marine Mammals and Other Megafauna	Clarification on the modelling start year for iPCoD modelling (which was 2031) is provided in Section 5.5.4 .	As outlined within BOW-L-0409 dated 16 th March 2026 "The discrepancy in the modelling start year relates to a typographical error in the code used to generate the outputs. As a result, the outputs are labelled as starting in 2036,

Technical Report) states that the input range was between 2031-2034.		however the modelling itself was undertaken using the correct construction timeframe. The piling period modelled corresponds to 2031 – 2034, as described within the Project Description and reported within Appendix 10.2 (Marine Mammals and Other Megafauna Technical Appendix). The modelled outputs are therefore considered to be correct in terms of the piling scenarios and associated results. “ and in Section 5.5.4 - we are content with this clarification.
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B.1 Maximum Design Scenario (MDS) included piling parameters and durations

Prior to the submission of the AEI R in discussions with the Applicant, they indicated that they had provided signposting to various documents within the EIA in which they believed the project parameters had been provided.

Whilst we do agree that project parameters were included within the EIA, there was confusion about what would ultimately have been consented and what was included within the assessment. Therefore, it was not clear if magnitude had been fully accounted for. Follow up discussions and information provided in the AEI R showed that this request was warranted.

While a broad envelope is expected at this stage, to ensure an efficient review and process of any future submissions, we request that project parameters that are key for a receptor specific assessment are more clearly defined within a summary table. This would facilitate a more efficient appraisal of the application and ensure that any consent is specific on the parameters for which consent is being awarded.

Anchors

It is noted in Scenario 1 that the underwater noise modelling presented is modelled on 8 piles installed per day and was assessed within the EIA. The AEI R presents a worst-case scenario based on 5 piles installed per day (and per vessel when concurrent piling is proposed) which accounts for an increased number of piling days. We are content with this update as the underwater noise modelling is precautionary.

The Applicant noted that the incorrect number of 406 piling days was used in the EIA R iPCoD for Scenario 1 (single vessel, 5 piles per day) we accept that this error makes the iPCoD modelling more precautionary. The AEI R provides a corrected estimated number of piling days as 126 day for this scenario.

During post application submission discussions we highlighted the potential unrealistic nature of a concurrent WTG piling scenario - we appreciate in the AEI R the identification of two new piling schedules to ensure the worst-case scenario has been accounted for. These scenarios include the “fast bounding scenario” and the “realistic concurrent scenario”.

We are content with the updated scenarios covering the potential worst-case scenario and are more realistic than what was presented within the EIA.

OSPs/IRC

The AEI R confirms that assuming no weather delays, the three OSP platforms and one IRC platform will indicatively take three days of piling each to construct (12 days in total; each will have a four-legged jacket foundation with 12 piles per platform). We do note that the potential number of animals disturbed and the additional number of piling days from the installation of these platforms were not included within iPCoD modelling. We are content that these do not need to be revisited at this stage but highlight that the outputs from iPCoD may be underestimated.

We are content that this request for additional information has been satisfied.

B.2. Flee speeds

In our original response (01.10.25), we requested the number of individuals impacted from cumulative PTS across each piling scenario be updated using the agreed flee speeds for Low

frequency and Very High frequency cetaceans. **The Applicant has now provided these, which we are content with.**

As outlined within our original advice: **Post any consent, we encourage the Applicant to work strategically on their refinement of the project design envelope by reducing precaution in the marine mammal assessments: focusing on underwater noise monitoring, cumulative PTS, how repeated TTS can cause PTS and supporting research that focuses on how the impulsivity of noise changes with distance.**

Future refinement should consider whether there is still a potential risk of injury to marine mammals, and thus the requirement for a European Protected Species (EPS) license for injury. This should be based on the 185 dB threshold for minke whale and 155 dB threshold for harbour porpoise, in relation to concurrent piling (if this option is still being considering after refinement).

The Applicant has included a number of steps in the AEI R to apply more realism to the number of animals with the potential for cumulative PTS (higher injury threshold, percentage of individuals predicted to experience PTS, faster flee speeds). Noting that the final numbers do not account for the use of ADD and standard mitigation measures such as Marine Mammal Observers/Passive Acoustic Monitoring Operators. While we appreciate the inclusion of these conservative assumptions in the assessment, we request that for post-consent documentation submission and for any future applications and that discussions on this approach are discussed with NatureScot prior to submission. This will streamline the application process and reduce the need for additional information or clarifications.

As mentioned within our original response, these outputs need to be interpreted with caution, and it is difficult to tease apart the impact these compounding assumptions have on the final results.

Interim Population Consequences of Disturbance (iPCoD)

We are satisfied with the iPCoD modelling, although the request was not specific to grey seals, the additional information and clarification provided is appropriate to satisfy our request.

We appreciate the mean and median being presented for iPCoD outputs as requested and recommend this approach if any future submissions are required.

Conclusions

As outlined within our original advice (dated 01/01/2025) using the *“first pile dose-response curve (noting the precaution in this approach) the percentage of the UK portion of the MU disturbed would be Significant in EIA terms for white-beaked dolphin (11.4%), Risso’s dolphin (13.7%) and harbour porpoise (7.2%). These percentages further increase when considering concurrent WTG piling using this approach: 12.9%, 15.2% and 8.4% respectively.”*

After further discussion on iPCoD modelling and the understanding of the precaution built into the modelling, we note a mean >10% change on the counterfactual population size for minke whale, offshore bottlenose dolphin and harbour porpoise after 23 years following piling cessation. **We therefore conclude Significant impacts on these species in addition to those previously advised in our EIA R response.**

We advise that if the Scottish Ministers consent this Application

- The Applicant will need to consider the implications of our revised conclusions further, through the development of the Piling Strategy and Marine Mammal Mitigation Protocol (MMMP) with updated assessments, post-consent, to identify reductions to the predicted impact to Risso's dolphins, white-beaked dolphin, minke whale, offshore bottlenose dolphins and harbour porpoise.
- As outlined in our original advice given these predicted impacts, we advise that monitoring to validate the EIA / AEI Report predictions and better understand the likelihood of these impacts may be required.

B.3. Grey Seal Reference Population

We acknowledge the reasoning provided in the AEI R for including the Northeast England SMU in the EIA application, noting that paragraph 5-64 was outlined within a pre-application letter in which the criteria for including SMU was outlined and agreed upon. The miscommunication stemmed from why all SMU in Scottish waters and Northeast England were deemed to be appropriate as the reference population within the assessment. Figure 5-1 outlines clearly the underwater noise modelling contours and the SMUs where there is overlap. We would note that as outlined in Figure 2-1 within **Appendix 10.2: Marine Mammals and Other Megafauna Technical Report** the dose response curve used for seal species (Whyte *et al.*, 2020) does not extend to 120 dB.

We are content that the updated reference population has been used within the cumulative assessment, and nothing further is required.

B.4. Cumulative assessment

Disturbance from piling

We recognise the logistical constraints regarding vessel availability, the inherent variability in construction timelines, and the precautionary assumptions applied to disturbance modelling.

Additionally, ScotWind projects submitted later in the process are showing larger population level impacts and total potential number of animals disturbed due to more project specific information being available for inclusion.

Based on the potential number of animals disturbed, the result percentage of the management Unit (MU) impact and the outputs from iPCoD we conclude Significant impacts from disturbance from piling to minke whale, inshore bottlenose dolphin, offshore bottlenose dolphin, Risso's dolphin, white-beaked dolphin and harbour porpoise. Although, the grey seal iPCoD outputs do not show a substantial deviation in population size, the percentage of the population impacted is sufficient for us to conclude Significant impacts to this species.

We recognise both the precautionary approach used in assessing cumulative impacts for disturbance from piling activities, as well as the wide project envelopes being assessed at the application stage. In our experience, post consent and following project refinement (i.e. parameters and schedules) for all projects screened, further consideration is required of both project alone and cumulative project impacts should be re-assessed post-consent.

Non-piling activities

It is worth noting that NatureScot recommend a 5km EDR for USBL, MBES and SBES (>12 kHz) for any geophysical survey activities.

The current PDE indicates the potential Proposed Development skims over the proposal to install three export cable routes and that all impacts from non-piling activities, could therefore be three-fold. The Applicant underplays this potential in many of the project alone and cumulative impacts. This is also apparent in the visualisation of the ECC, NatureScot are assuming that the cables will remain within the one boundary outlined within the figures provided within the assessment.

However, noting the above, NatureScot agree with conclusions overall.

B.5. Southern Trench NCMPA

Cumulative PTS (IRC)

NatureScot's advice that until the location of the IRC is known, we conclude that a seasonal restriction on piling of the IRC will be required, such that piling occurs outside the months with higher-than-average minke whale densities (June to October) - the key period of June – October when minke whales have been consistently recorded in the Southern Trench (Paxton *et al.*, 2014⁶, NatureScot conservation advice⁷).

This is because the IRC may be installed within 5 km of the Southern Trench MPA and the potential for minke whales within the MPA to incur auditory injury over a 3-day period. Noting that the project modelled location is 16 km from the MPA and this is the predicted worst-case scenario for the IRC in terms of noise impact contours. However, the worst-case modelled location for the MPA assessment is likely to be the closest distance to the site, although we agree with the points being made by the Applicant. For example, the 10 km PTS-Onset Range (Hastie *et al.*, 2019) being referred to would have a significantly higher overlap with the MPA if the IRC was located within 5 km of the site rather than 16 km.

The proposal as stands has the potential to hinder the conservation objectives and therefore a seasonal restriction is required at this stage. Once it has been established that an IRC is indeed required, and the exact location is known this can be discussed further and mitigation measures adapted accordingly.

Disturbance

Project alone

The assessment for disturbance from piling activities has been updated using the requested dose-response curve (first pile; Graham *et al.*, 2019).

Considering pile driving activities will occur between March – October (inclusive) for a period of between 2 – 4 years, with received level contours from the worst-case scenario (SE location) and

⁶ <https://www.nature.scot/sites/default/files/2017-11/Publication%202014%20-%20SNH%20Commissioned%20Report%20594%20-%20Statistical%20approaches%20to%20aid%20identification%20of%20Marine%20Protected%20Areas%20for%20Minke%20whale%2C%20Risso%27s%20dolphin%2C%20White-beaked%20dolphin%20and%20Basking%20shark.pdf>

⁷ <https://www.nature.scot/sites/default/files/nature-conservation-mpa/10477/conservation-and-manageme...>

concurrent piling (NE, SE and W locations) expected to extend over 97.68% and 98.16% of the MPA respectively. Noting that the effective disturbance area is 18.78% and 18.85% respectively.

Given the current worst case scenario, uncertainties around final PDE parameters, the and the many precautions within the modelling approach, we are unable to advise if disturbance from piling activities will hinder the conservation objectives of the NCMPA Southern Trench.

We advise that seasonal restrictions are implemented – this can be reviewed if the design envelope is revised and the potential impact from piling activities are re-modelled.

Should Scottish Ministers consent the project, we advise:

- **A requirement for seasonal piling restrictions (June – October) unless the potential for disturbance from piling activities has been reduced to levels that ensure the conservation objectives of the NCMPA are not hindered.**
- **The Applicant contributes to the strategic minke whale monitoring partnership study focusing on broadband acoustics in the Southern Trench NCMPA.**
- **The applicant undertakes site-specific monitoring during construction, as well as monitoring of minke whale behaviour pre, during and post construction to validate their assessment. This can be linked into the strategic monitoring project above.**

Cumulative assessment

The Applicant has provided all additional information requested.

We agree based on the dose-response noise contours provided within MarramWind s36 application that there is potential overlap between the project's disturbance noise contours and the NCMPA. It is noted that Salamander was included within the original MPA assessment but not in the revised assessment within the AEI R. Therefore, the cumulative assessment may be underplaying the impacts to the MPA.

It is not clear what conclusion the project has reached based on the re-assessment provided.

With the understanding that all projects are likely to undergo a refinement of their design envelope and the worst-case scenario for all projects has been used within the cumulative assessment, we are unable to rule out the hindering of conservation objectives and conclude that disturbance from cumulative piling activities **is capable of affecting the protected features (i.e. minke whale), other than insignificantly.**

We recommend that project refinement of the design envelope for project as well as taking account of all other consented projects with the potential to contribute to the disturbance of minke whale within the NCMPA will need to be kept under review and re-assessment of the cumulative effect of disturbance undertaken, (sequentially or in parallel if construction periods overlap) to establish the realistic impact to the site. There may be the requirement for Noise Abatement Systems (NAS) seasonal restrictions or phasing of works and or other noise mitigation measures to be utilised if the hinderance of the conservation objective cannot be ruled out for the minke whales feature of the NCMPA.

We advise further discussion and consideration with MD LOT on both the consideration of future EPS licencing for all cetaceans as well as this issue in respect of potential predicted impacts to minke whales as a feature of the Southern Trench NCMPA.

NATURESCOT ADVICE ON BUCHAN OFFSHORE WINDFARM

Appendix C Fish and shellfish ecology

The AEI R addresses issues raised by NatureScot regarding potential impacts on herring and sandeel from underwater noise and increase in suspended sediment concentration (SSC).

The AEI R reasserts the EIA R that the development has no significant impact in terms of EIA for herring and sandeel either alone or cumulatively.

We welcome the additional information and although we broadly support most of the conclusions reached regarding significance in EIA terms and agree with the conclusion on **Not significant for herring a, we maintain the following exceptions:**

- **We do not accept the conclusion of Not Significant for sandeel for injury and behaviour changes (TTS) on the basis of the information provided.**
- **We do not consider predicted increases in SSC for sandeel to be Not Significant on the basis of the information provided.**

Our interest in fish species and the conclusions being reached relate to the importance of this species as a prey species but also as fundamental building blocks in the food web chain and therefore marine ecosystem resilience.

Our advice for sandeel is:

- **Prior to construction and as part of the final design envelope selection, further assessment and where necessary mitigation should be provided to assess impacts in terms of temporary and long-term loss of habitat, underwater noise, suspended sediment concentration and changes in productivity of sandeel, with potential mitigation such as timing of activity to avoid key biological sensitive periods. This could be achieved through the development of a Fish Mitigation Plan.**
- **This plan should consider disturbance during key life history stages for sandeel (spawning / winter hibernation) and with reduction / finalisation of the project design envelope, sensitive siting and whether sensitive scheduling of works in key areas could be of benefit in minimising impacts.**

For herring, **whilst our concern is sandeel**, we note there is still impact on herring and this should be considered as part of the final design envelope selection and where necessary mitigation should be provided. **This could be achieved through the development of a Fish Mitigation Plan.**

C.1 Baseline characterisation

The developer has provided more detailed and thorough assessments for both sandeel and herring, as requested.

NatureScot are content that the updated AEI R, considers site specific data now in the baseline characterisation including eDNA and other site-specific environmental data (Table 3.5.), with the site-specific surveys identifying an additional 30 species in addition to the Franco *et al.* (2022), including a high occurrence of herring and sandeel in eDNA.

The AEI R highlights that although there is overlap of herring spawning grounds and the export cable corridor (ECC), the area of potential habitat could be an overestimate. While we agree that this is a possibility, we welcome the precautionary approach. In addition, although alternative potential spawning habitat is identified within the regional study area, it should be highlighted that disturbed herring may not necessarily make use of it.

Using the updated mapping, the suitable spawning habitat for herring is quantified with the highest confidence as 18.88 km² within the proposed offshore development site, this is compared to 4,755.04 km² (0.04%) of suitable spawning habitat across the regional study area. Baseline data is considered in the assessment. However, the narrative focuses on demonstrating why the Proposed Offshore Development Site is not important for herring. For instance, while we agree that the eDNA detects herring passing throughout the Proposed Offshore Development Site it does not necessarily indicate presence of spawning or nursery grounds, the eDNA results however demonstrate that herring are utilising the area.

In regard to sandeel, we are content that the AEI R presents a clear narrative and synthesis of available information.

C.2. Increases in Suspended Sediment Concentrations (SSC) and deposition

Herring - SSC & Deposition

In our response (01.10.2025), NatureScot highlighted while we accept that remobilisation of SSC to natural background levels is likely in 12 days, the narrative provided does not place the results in the context of all construction activities likely to increase SSC or what this may mean for areas of suitable habitat. There is no change in the worst-case scenario was provided in the AEI R and the EIA R.

There are some minor issues/lack of clarity in the Applicants assessment:

- Suspended Sediment Concentrations (SSC) and deposition will occur throughout construction, but the impact is not quantified over time.
- We note that section 3-149 states *“Further evidence indicates herring can bury between 8 and 12 cm depth (Holland et al., 2005; JNCC, 2018), the maximum predicted deposition depth.”* This statement is incorrect, the references refer to sandeels and not herring, they also do not state that sandeels can bury up to 12 cm depth, but that they can be found within the top 8 cm of sediment as they need to remain in the oxic layer of the sediment, which is rarely greater than 8 cm deep. However, this won’t change the overall conclusions of the assessment.
- The amount of time for conditions to return to baseline following sedimentation is not clear due to the different language used around the 12-day period. There is variation in the terminology used to describe the period of 12 days of elevated SCS and deposition period. For example; “sediment deposition (of 12 cm) decreasing after a maximum of 12 days” (3-153), “time for SSC to become imperceptible (i.e. within 12 days)” (3-145), or “values rapidly returning within the levels of natural variability (including storm events), within approximately 12 days” (3-139), as a few examples.
- Paragraph 3-128 discusses mooring chains causing SSC during O&M and refers to Table 3-3 (800m² per chain, totalling 0.5km²). However, Table 3-3 does not mention mooring chains as MDS in relation to this impact.

The additional information report reasserts the position that the development for SSC and sediment deposition on herring is Not Significant. NatureScot consider, due to the limited area of overlap between the high likelihood herring spawning ground, **we agree with the conclusion of Not Significant**. However, there is doubt over the true extent of this impact.

Sandeel- SSC & Deposition

In our original response (01.10.25) we stated that it was unclear how much movement of mooring chains will contribute to sediment resuspension and how this will affect the sediment type and suitability for sandeel. The AEI R acknowledges (3-336 & 3-338) that mooring lines will produce localised increased SSC, but the SSC levels are not expected to be above those experienced naturally, with limited deposition expected outside the direct footprint of the disturbance. However, there is no further information on the contribution of sediment resuspension, effects on sediment type, area of impact or potential impacts on localised sediment suitability for sandeels.

The AEI R concludes Not Significant effects for increased SSCs and deposition on sandeel and states in 3-342 that the Proposed Offshore Development Area is *“not likely to be important for sandeel because areas of preferred habitat are patchy offshore”*, however NatureScot disagree with the statement, highlighting the likely preferred sandeel habitat throughout the Proposed Offshore Development Area (Figures 3.9, 3.10 3.13, 3.14) and therefore the impact of ≤12cm deposition and 270mg/L of SSC are likely to have a significant effect on sandeel. We therefore **do not consider the impacts to be Not Significant**, on the basis of the information provided.

C.3. Increases in underwater noise leading to mortality, injury and behaviour

When considering the potential for significant underwater noise effects we acknowledge the associated uncertainty and precaution inherent within underwater noise models. We focus our advice on areas where there is variation with our assessment with the Applicant in the AEI R.

There are a number of issues with the presentation of the UWN data:

- The key in Figure 3.7 shows sound contours for SELss. However, based on the thresholds provided (186, 203, 207 dB), we have interpreted the thresholds as SELcum thresholds.
- Table 3-7 uses the unit km²h, which is unusual in the context of underwater noise and it is unclear if this is an error or whether this is a way to minimise the area of impact by providing an area per hour. Often SELcum is provided as an area in km² and represents the area of impact over a 24-hour period. Based on this unit, the area of overlap of TTS is 1.28% of marginal herring spawning habitat and 1.33% of preferred herring spawning habitat. The proportions of spawning potential impacted (%) provided in AEI R Table 3-7 are smaller than those provided by the EIA Table 8-29 due to larger areas of spawning potential for both marginal and preferred habitat.
- Table 8-16 in EIA shows SELcum for 219, 216 and 186 for group 1 (i.e. sandeel), but in Figure 3.15 (AEI R) the contours shown are for 210, 203 and 186, which are the contours for group 2 and 3 fish. This visually shows it as more precautionary impact on sandeel, as the ranges of impact will be larger for mortality and injury than they would be for sandeel, but it's not correct.

Sandeel – Under water noise

The applicant has provided limited assessment on behavioural impacts on sandeel, outlining that the greatest impact will arise from the overlap of noise with sandeel within spawning and nursery grounds, potentially affecting congregating and use of the areas for key life events i.e., spawning and overwintering. However, it is important to note that changes to sandeel distribution due to avoidance of the UWN by sandeels, or reduction in quality of prey due to reduced feeding by sandeels, could have knock on impacts to predators that rely on sandeels as an essential food source, considering that recovery may occur within one to three years (3-382) and could be repeatedly impacted for three consecutive years due to the proposed construction programme.

In addition, we had previously stated that there has been no mention of proposed piling times (other than the anticipated start year), and therefore it is difficult to assess with certainty whether piling operations will interact with the burrowed period of sandeel between September and February (emerging in November – February to spawn). In the AEI R, no further information is provided to suggest the developer will avoid burying or spawning periods for sandeel. As highlighted in Figure 3.15, there is a significant area of possible sandeel habitat overlapping with the UWN sound contours. The modelled areas for mortality and injury will occur throughout the array area for up to 70 WTGs. Sandeel show high site fidelity and although there is suitable habitat elsewhere outside of the Proposed Offshore Development Site, this doesn't negate the direct impact within the proposed Development area, which we consider having relative importance, particularly where mortality and injury are concerned. As such **we still cannot accept the conclusion of Not Significant for sandeel for injury and behaviour changes (TTS) on the basis of the information provided.**

Herring – Under water noise

The AEI R considers herring as stationary receptors for underwater noise impacts. Noting that herring are mobile when not spawning or at nursery grounds.

We agree with the applicant, that the updated baseline provides additional certainty in characterising the relative importance of the Proposed Offshore Development Site for herring, through the provision of additional information, including the heat map for spawning potential. In addition, the UWN mapping identifies limited overlap over areas of herring spawning. We therefore agree with the Applicants conclusion of **Not Significant herring for injury and behaviour changes (TTS) on the basis of the information provided.**

C.4. UXO clearance

This AEI R does not re-visit UXO. Although such an activity (if required) would require a licence application informed by the detailed information available at that time. We advise that we have not supported a conclusion on Not Significant for other project predictions for mortality impact area of $\leq 0.43\text{km}$ (234dB) and $\leq 0.72\text{km}$ (229dB) for mortal injury particularly in relation to herring.

As UXO is considered as part of the “project” for EIA purposes, and no further information is presented, **we cannot support a conclusion on Not Significant from UXO clearance, however we note the PDE is likely to change we advise that further consideration of UXO is required as part once a UXO plan is in place and as part of the Fish Mitigation Plan to identify whether UXO clearance which is likely to result in significant disturbance and mitigation is required .**

C.5. Long term habitat loss

We welcome the reassessment of the impact of long-term habitat loss for all receptor species (Section 3.8), in addition to herring (Section 3.6.5) and sandeel (Section 3.7.5). This now includes mooring systems, export cable protection and inter array cabling, The calculations are clearly presented and do not significantly increase the amount of area lost for each species, therefore we agree with the applicant's assessment of **Not Significant** for Long Term Habitat Loss.

C.6. Cumulative effects assessment

Further detail has been provided, particularly for herring and sandeel. Inclusion of cumulative quantification, when provided, of impact have helped to substantiate statements of negligible impact. We welcome the additional details for developments that have been considered.

C.7. Mitigation and Monitoring

In line with established EIA practice, we expect mitigation to be identified where a significant adverse effect is identified. The applicant concludes not significant for all receptors and therefore the assessment presented within this AEI R does not rely upon future monitoring to conclude that effects are Not Significant. However, we conclude Significant effects on sandeel on the basis of the information provided.

We had previously advised that prior to construction and as part of the final design envelope selection, further consideration and where appropriate mitigation for sandeel and herring should be provided (. This could be achieved through the development of a Fish Mitigation Plan.

We welcome the commitment in AEM 57 - development and adherence to a Fish Mitigation, noting no further details are provided. We welcome the commitment to further consultation with MD-LOT and NatureScot and the Applicants consideration for contribution to relevant ScotMER research initiatives, through development of the FMP e.g. emerging research on particle motion effects.

Therefore, while we welcome the applicant's statement that any future monitoring would be used to improve understanding of receptor responses, support adaptive management where appropriate and contribute to the wider evidence base for offshore wind developments. **We reiterate our advice for the development of an FMP:**

- **Prior to construction and as part of the final design envelope selection, further assessment and where necessary mitigation should be provided to assess impacts in terms of temporary and long term loss of habitat, underwater noise, suspended sediment concentration and changes in productivity of sandeel, with potential mitigation such as timing of activity to avoid key biological sensitive periods, . This could be achieved through the development of a Fish Mitigation Plan.**
- **This plan should consider disturbance during key life history stages for sandeel (spawning / winter hibernation) and with reduction / finalisation of the project design envelope, sensitive siting and whether sensitive scheduling of works in key areas could be of benefit in minimising impacts.**
- Whilst our concern is sandeel, we note there is still impact on herring and this should be considered as part of the final design envelope selection and where necessary mitigation should be provided.

NATURESCOT ADVICE ON BUCHAN OFFSHORE WIND FARM

Appendix D Marine and coastal processes

Marine and coastal physical processes are considered in Chapter 6 (Volume 2) and the following, relevant supporting appendices:

- *Marine and Coastal Physical Processes Modelling Technical Appendix, Appendix 6.1*
- Marine Protected Area Nature Conservation Assessment, Volume 3, Appendix 7.3

D. 1. Impact 2 - Sandwave clearance

NatureScot had requested clarification on whether sandwave clearance is required throughout the operational phase and if so, further assessment of the Impact 2 *“Alteration to seabed composition, structure, and morphology”* may then be necessary as well as further consideration of potential impacts from increased seabed disturbance across other related receptors.

The AEI R states that no sandwave clearance is anticipated during the operational phase and extends the estimated recovery time from “weeks to months” to “months to a few years”. Although sandwave clearance is not anticipated, additional evidence supporting this statement is not provided and clearance might need to be repeated during the lifetime of the development. The AEI does not address this, so the Impact 2 assessment remains incomplete. Taking a precautionary approach, the sandwave areas could spend much more of the development lifetime in a ‘cleared’ (or partially re-forming) state rather than in a ‘recovered’ state.

In our review of the evidence submitted as part of the EIA R and the AEI R, NatureScot consider that this ‘not temporary’ aspect would raise the effect Magnitude to “low”, or “medium” at most. Given the “low” Sensitivity of the sandwave areas as physical-process receptors, the conclusion for Impact 2 remains Not Significant.

D.2. Impact 7 - Stratification

In our EIA R advice (October 2025) we highlighted that we did not consider the argument on *Impact 7 Impacts to stratification and the Buchan Front*, that the effect Magnitude would be ‘low’ to be convincing and advised, that advice should be sought from MD-SEDD on mixing and seasonal stratification.

The AEI moves on from the position taken in the EIA (6-198), that the floating foundations would “not considerably interact with the thermocline”. Instead, potential energy analysis (PEA) is combined with the characterisation of frontal position relative to the array area, modelling of the turbulence:advection ratio, and consideration of the contribution from array-induced changes to tidal flow and waves. There is no change to the EIA conclusion of Not Significant.

The additional analysis addresses our concerns. However, we advise a MD-SEDD are consented specifically on this topic of mixing and seasonal stratification.

D.3 Cumulative effects assessment

Although this part of the AEI does provide additional detail, the arguments presented still appear over-reliant on ‘project alone’ assessment. The focus is on the very localised spatial extent of

predicted change from the Buchan development, with little consideration of the spatial extent of changes from 'other projects'.

In this regard, we suggest the key 'other project' is MarramWind OWF, considering its size and relative position. Taking account of our advice on MarramWind (18.03.2026), we are content that various potential cumulative impacts, including changes to stratification and changes to tidal flow, would not be significant.

We consider the 'low' Sensitivity of the seabed in physical-process terms does not justify further cumulative assessment solely in terms of physical processes. We do not consider further cumulative assessment is required in areas of seabed change (Impacts 2 & 4) and changes to wave climate (part of Impact 5) as no other receptor is significantly sensitive to cumulative increases in these impacts.

Northern Lighthouse Board

From: Redacted
To: [MD Marine Renewables](#)
Cc: Redacted ; Redacted ; Redacted
Subject: RE: [EXT] 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026
Date: 13 July 2026 12:03:01
Attachments: [image001.png](#)

Good afternoon,

NLB have no comment to provide on the Additional Information provided as part of the Buchan OWF EIA.

Regards

Adam

Adam Lewis

Coastal Inspector
Northern Lighthouse Board

T: 0131 473 3197

M: Redacted

E: Redacted

From: MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>
Sent: 07 July 2026 10:12
To: MD.MarineRenewables@gov.scot
Cc: Redacted ; Redacted ; Redacted
Subject: [EXT] 00011358 / 00011359 - Buchan Offshore Wind Limited – Buchan Offshore Wind Farm – Additional Information Consultation – Response Required by 18 August 2026

Dear Sir/Madam,

ELECTRICITY ACT 1989

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

The Electricity (Applications for Consent) Regulations 1990

MARINE (SCOTLAND) ACT 2010

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

MARINE AND COASTAL ACCESS ACT 2009

The Marine Works (Environmental Impact Assessment) Regulations 2007 (*“the MW EIA 2017 Regs”*)

00011358 – 00011359 – Buchan Offshore Wind Limited – Buchan Offshore Wind – approximately 75 km off the coast of Aberdeenshire

On 11 August 2025 Buchan Offshore Wind Limited (“the Applicant”) submitted an application to the Scottish Ministers, in accordance with the above legislation, to construct and operate the Buchan Offshore Wind farm.

Further to the consultation on the applications and EIA Report issued on 19 August 2025, the Applicant has now submitted new documents and additional information as follows:

- [Overarching Acronyms](#)
- [Overarching Glossary](#)
- [Chapter 1: Introduction](#)
- [Chapter 2: Physical Processes](#)
- [Chapter 3: Fish and Shellfish](#)
- [Chapter 4: Offshore Ornithology](#)
- [Chapter 5: Marine Mammals and Other Megafauna](#)
- [Chapter 6: Shadow Derogation](#)
- [Appendix 4.2: Ornithology Incombination PVA Selection Tool](#)
- [Appendix 5.2: iPCoD Piling Scenario](#)

In accordance with the MW EIA 2017 Regs, a copy of this additional information must be supplied to everyone who was provided with a copy of the EIA Report.

All the information about the project, including the EIA Report, can be found at: <https://marine.gov.scot/?q=node/23694>. The information provided in relation to the project including all other environmental topic assessments other than physical processes, fish and shellfish, offshore ornithology, marine mammals and other megafauna and its shadow derogation case remain as per the information provided within the EIA Report which you were previously consulted on. Any previous representations which you have submitted with regards to the above section 36 consent and marine licence applications will be considered.

Please submit your representations on the additional information to MD.MarineRenewables@gov.scot by 18 August 2026. If you are unable to meet this deadline, please contact the Marine Directorate – Licensing Operations Team on receipt of this e-mail.

Kind regards,
Iain

Iain MacDonald
Marine Licensing & Consenting Casework Officer, Licensing Operations Team,
Marine Directorate

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB
M: Redacted | E: Redacted

The Scottish Government



To see how we use your personal data, please view our
[Marine licensing and consenting: privacy notice - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/marine-licensing-and-consenting/privacy-notice/pages/privacy-notice.aspx)

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Scottish Environmental Protection Agency

From: [Planning.North](#)
To: [MD Marine Renewables](#)
Cc: Redacted
Subject: PCS-20009339 SEPA response to 00011358 / 00011359
Date: 07 July 2026 13:46:32
Attachments: [image.png](#)

To Whom It May Concern,

00011358 / 00011359 - additional information for Buchan offshore wind farm, approximately 75 km off the coast of Aberdeenshire

Thank you for the above consultation. Based on the information provided, this application appears to fall below the thresholds that SEPA provide site specific advice for. Please refer to [SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations](#) and our wider standing advice and other guidance, which is available on our website via www.sepa.org.uk/environment/land/planning/. If you require our advice on a significant site-specific issue that is not addressed by our guidance or other information available on our website, please reconsult us clearly highlighting the issue in question and we will do our best to assist.

from

Nina Caudrey

Senior Planning Officer



For the future of our environment

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