

Aberdeen City Council

**From:** [PI](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** RE: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024  
**Date:** 18 January 2024 11:41:39  
**Attachments:** [image003.png](#)

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Good Morning

I have returned your email as Wick is not in the Aberdeen City Council area.

Regards

Wilma



**Wilma Henderson** | Technical Assistant (Applications)  
Aberdeen City Council | Technical Team (Applications) | Strategic Place Planning  
Marischal College | Broad Street | Aberdeen | AB10 1AB

[Redacted]

Technical Team: 01224 053746

Email: [pi@aberdeencity.gov.uk](mailto:pi@aberdeencity.gov.uk)

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

**Sent:** Thursday, January 18, 2024 9:47 AM

**To:** MD.MarineRenewables@gov.scot

**Cc:** Rosanne.Dinsdale@gov.scot; Ben.Walker@gov.scot

**Subject:** SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

Dear Sir/Madam,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

(collectively referred to as the “EIA Regulations”).

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Approximately 50km East of Wick**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Stromar Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Stromar Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal (“HRA”) Screening Report. The HRA Screening Report provides information to enable the screening of the Stromar Offshore Wind Farm with respect to its potential to have a likely significant effect on

European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **19 February 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Yours faithfully,

Iain

**Iain MacDonald**

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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Aberdeen International Airport

**From:** [#ABZ Safeguarding](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** RE: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024  
**Date:** 21 February 2024 11:13:58  
**Attachments:** [image001.png](#)  
[image073853.png](#)  
[image836985.png](#)  
[image645533.png](#)  
[image311814.png](#)  
[image592607.png](#)  
[image576081.png](#)  
[image019855.png](#)  
[image945629.png](#)  
[image666905.png](#)

This proposal is located outwith the consultation area for Aberdeen Airport. As such we have no comment to make and need not be consulted further.

Kind regards  
Kirsteen



#ABZ Safeguarding

✉ [abzsafeguard@aiairport.com](mailto:abzsafeguard@aiairport.com)

🌐 [www.aberdeenaairport.com](http://www.aberdeenaairport.com)

📍 Aberdeen International Airport Limited, Dyce, Aberdeen, AB21 7DU

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**From:** MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>  
**Sent:** Thursday, January 18, 2024 9:47 AM  
**To:** MD.MarineRenewables@gov.scot  
**Cc:** Rosanne.Dinsdale@gov.scot; Ben.Walker@gov.scot  
**Subject:** SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

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Dear Sir/Madam,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017  
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT**

**ASSESSMENT) (SCOTLAND) REGULATIONS 2007  
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017  
(collectively referred to as the “EIA Regulations”).**

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind  
NE3 Site - Approximately 50km East of Wick**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Stromar Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Stromar Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal (“HRA”) Screening Report. The HRA Screening Report provides information to enable the screening of the Stromar Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **19 February 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a “nil return” response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Yours faithfully,  
Iain

Iain MacDonald

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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\*\*\*\*\*

Aberdeenshire Council



Our Ref:  
Your Ref:

Ask for: James Hewitt  
Tel: 01467 533055  
Email: james.hewitt@aberdeenshire.gov.uk

01 March 2024

Dear Sir/Madam

**The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017  
The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2007  
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations  
2017**

*(collectively referred to as the 'EIA Regulations')*

**EIA Screening/Scoping Opinion for Offshore Development (Scoping Opinion) at  
Stromar Offshore Wind Farm, Scotwind NE3 Site – approximately 50km East of Wick**

1.1 I refer to your request for a scoping opinion for the above proposal received on 18 January 2024. Your request sought advice relating to the content of a future environmental assessment with a scoping report and appendices provided for consideration.

1.2 The Aberdeenshire Council Area is unlikely to be directly impacted by the Offshore element of this development, and therefore the scope of comments within this response are likely to be limited.

1.3 A separate Scoping Opinion in relation to the Onshore Development has been adopted by Aberdeenshire Council.

2.0 Approach to EIA

2.1 The proposed methodology of the EIA is considered to be orthodox. However, it is noted that an alternative approach to scoping has been proposed. This alternative approach would see a later review of the scoping response, with a view to further refining the scope of assessment (in light of further survey work) to result in an EIAR which only covers likely significant effects.

2.2 The Council notes that this approach would lead to a more streamlined EIA. However, I would raise concerns about the level of transparency associated with a further refinement of the scoping opinion. It is the view of the Planning Service that such refinement would necessitate the submission of a second scoping request, providing a robust justification and evidence for any reduction in the scope of assessment. The submission of a second scoping request would increase the transparency of this process.

2.3 Whilst the decision as to the mechanism for additional refinement of the Scoping Opinion for the offshore development is a matter for MD-LOT, the Council has advised an additional scoping request would be necessary for the onshore elements of the development.

### 3.0 Access

3.1 I note that the development would landfall within Aberdeenshire, I would ask that consideration be given to the impact of the landfall works upon core paths and rights of way in relation to the coastal path. Whilst it is possible that such impacts may not cross the significance threshold, they should be further explored before such a determination is made.

### 4.0 Conclusion

4.1 I hope the above information is of assistance when adopting a Scoping Opinion in relation to this development.

4.2 Please note that comments have been limited to those matters which are likely to effect the Aberdeenshire Council Area. Impacts associated with the terrestrial development have been covered separately by the onshore scoping response.

Yours faithfully

[Redacted]

Paul Macari  
Head of Planning and Economy

BT Radio Network Protection Team

**From:** [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)  
**To:** [MD.MarineRenewables@bt.com](mailto:MD.MarineRenewables@bt.com)  
**Cc:** [Rosanne.Dinsdale@bt.com](mailto:Rosanne.Dinsdale@bt.com); [Ben.Walker@bt.com](mailto:Ben.Walker@bt.com); [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)  
**Subject:** RE: WID13312 SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024  
**Date:** 24 January 2024 13:30:16  
**Attachments:** [image003.png](#)  
[image005.png](#)



**OUR REF: WID13312**

Thank you for your email dated 18/01/24.

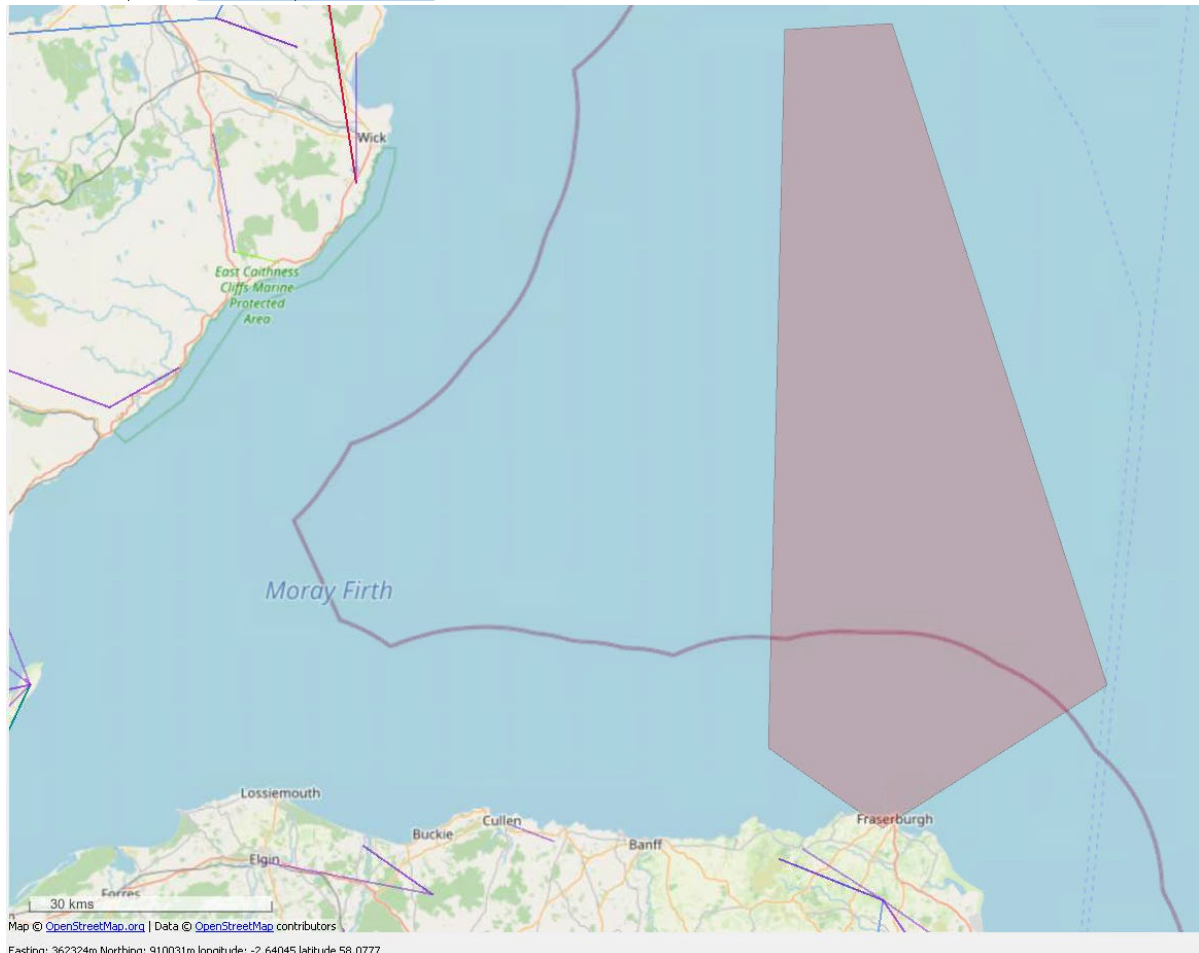
We have studied this proposal with respect to EMC using the below info and related problems to BT point-to-point microwave radio links.

The conclusion is that the location as provided attached should not cause interference to BT's current and presently planned radio network.

BT requires 100m minimum clearance from any structure to the radio link path.

Please note this refers to BT Radio Links only, you will need to contact other providers separately for information relating to other supplier links / equipment.

Please direct all queries to [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com).



Map © OpenStreetMap.org | Data © OpenStreetMap contributors  
Easting: 362324m Northing: 910031m longitude: -2.64045 latitude 58.0777

**Kind Regards**  
**Lisa Smith**  
National Radio Planner  
Network Planning



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**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** Thursday, January 18, 2024 9:47 AM

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

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Ben.Walker@gov.scot](mailto:Ben.Walker@gov.scot)

**Subject:** WID13312 SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

Dear Sir/Madam,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007  
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
(collectively referred to as the "EIA Regulations").**

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Yours faithfully,

Iain

[Iain MacDonald](#)

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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Edinburgh Airport

**From:** [Safe Guarding](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Safe Guarding](#)  
**Subject:** SCOP-0039 - Stromar Offshore Windfarm Limited  
**Date:** 22 January 2024 12:21:01  
**Attachments:** [image001.png](#)

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Good afternoon,

In respect of the above, I can confirm the location of this development falls out with our Aerodrome Safeguarding zone for Edinburgh Airport therefore we have no objection/comment.

With best regards,  
Claire

**Claire Brown**  
Aerodrome Safeguarding & Compliance Officer



  
**Our values**

t: +44 (0)131 344 3845 [Redacted]  
My working hours are  
[www.edinburghairport.com](http://www.edinburghairport.com)

Edinburgh Airport Limited  
Room 3/54, 2<sup>nd</sup> Floor Terminal Building  
EH12 9DN, Scotland

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Green Volt Flotation Energy Ltd





19 February 2024

Iain MacDonald  
Licensing Operations Team, Marine Directorate  
Scottish Government  
Marine Laboratory  
375 Victoria Road,  
Aberdeen AB11 9DB

Dear Mr. MacDonald,

**Regulation 14 of The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017**  
**Regulation 13 and Schedule 4 of The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2007**  
**Regulation 12 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017**  
**(collectively referred to as the “EIA Regulations”)**

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Approximately 50 km East of Wick**

Thank you for consulting Green Volt Offshore Windfarm Limited on the scoping report submitted in respect of the proposed section 36 application and marine licence applications for the Stromar Offshore Wind Farm – Scotwind NE3 Site.

Green Volt Offshore Windfarm Limited has been formed by Flotation Energy Ltd (Flotation Energy) and Vårgrønn AS (Vårgrønn), the developers of the Green Volt Offshore Windfarm ('Green Volt'). Flotation Energy is an offshore wind development company, headquartered in Edinburgh, UK. Founded in 2018, the company is pioneering the deployment of both floating and fixed offshore wind in Scotland, the UK and internationally. Vårgrønn is a growing agile offshore wind company and established as a joint venture between Italian energy major Eni Plenitude and the Norwegian private equity manager and offshore energy serial entrepreneur HitecVision.

**The Stromar Offshore Windfarm – Scotwind NE3 Site is located approximately 90 km from the Green Volt windfarm site** and the Stromar offshore cable corridor is located approximately 20 km from the Green Volt offshore export cable corridor at the nearest point. In paragraph 20.3.5 of the Stromar Offshore Wind Farm Offshore Scoping Report, the Applicant explains that existing offshore wind infrastructure has been considered including offshore wind farm projects currently in the early planning stages in addition to the proposed offshore wind developments. However, Figure 20.2 and Table 20.2 have omitted the proposed Green Volt Offshore Windfarm. The Applicant should be aware that the **section 36 and marine licence applications for the Green Volt Offshore Windfarm were submitted to MD-LOT on 20 January 2023**, with a consent decision expected in 2024. The

19 February 2024



applicant may wish to revisit the EIA scope for the proposed project considering the proximity of both projects. The Green Volt offshore applications are available on the [Green Volt website](#) and on [Marine Scotland's website](#).

## Offshore Aspects

Following an initial review of the Stromar Offshore Wind Farm Scoping Report, we note that the proposed project's landfall search area extends along the north Aberdeenshire coastline between Rosehearty and Fraserburgh. Although there is not direct overlap with the Green Volt project, which has a primary landfall option at St Fergus South, north of Peterhead, there is potential for interactions with Green Volt. Therefore, we would anticipate that the offshore EIA for the proposed Stromar project would consider the following:

- Impacts on the offshore elements of the Green Volt Offshore Windfarm project, including:
  - Increased vessel traffic from the physical presence of Stromar infrastructure that may lead to disruption or obstruction of the Green Volt activities;
  - Cumulative impacts on coastal protected areas designated for seabirds and the Southern Trench NCMPA designated for minke whale, burrowed mud, front and shelf deeps. **Green Volt has an operational target date of 2027** and should be included in any cumulative assessments.

## Onshore Aspects

It is noted that the proposed Stromar project has secured a grid connection and that the connection point will be at New Deer.

The Green Volt project applied to connect to the GB transmission system in 2020. A contract was subsequently issued by NG-ESO in 2021 and signed by Green Volt to connect to the existing New Deer substation. Green Volt has been assessed as out of scope for the Holistic Network Design (HND) process.

The onshore EIA report covering the onshore elements of the Green Volt Offshore Windfarm was submitted to Aberdeenshire Council on 3<sup>rd</sup> August 2023, with an application decision expected shortly.

Given the potential for both the Stromar and Green Volt projects to have a grid connection at New Deer, we would anticipate that the Stromar onshore EIA would consider the following:

- Direct impacts on the onshore elements of the Green Volt, including onshore cable and substation.



19 February 2024

We would welcome ongoing engagement with the Stromar Offshore Wind Farm project team throughout the EIA process, and particularly on the outcomes of any cumulative impact assessment undertaken by them. The Green Volt team can be contacted at [hello@greenvoltoffshorewind.com](mailto:hello@greenvoltoffshorewind.com).

Yours sincerely,

Maily Billet  
Senior Offshore Consenter, Green Volt Offshore Windfarm Ltd

# Historic Environment Scotland



**By email to:**

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

Iain MacDonald  
Marine Licensing & Consenting Casework  
Officer  
Marine Directorate (Aberdeen Office)  
Licensing Operations Team

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

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

Our case ID: 300068320  
Your ref: SCOP-0039  
19 February 2024

Dear Iain MacDonald

[The Marine Works \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017  
SCOP-0039 - Stromar Offshore Windfarm Limited - Stromar Offshore Wind Farm -  
Scotwind NE3 Site - Approximately 50km East of Wick  
Scoping Report](#)

Thank you for your consultation which we received on 18 January 2024 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers 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 (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

### **Proposed Development**

We understand that the indicative extent of the proposed development comprises of up to 71 floating turbines of up to 385m in height with associated infrastructure including accommodation platform, innovation platform, three export cables, scour protection and other relevant infrastructure.

### **Scope of assessment**

The proposed scope of assessment is sufficient for our needs. We are content with the methodology proposed in the scoping report.

We have the following comments on the scope of assessment and the contents of the report:

- There are no designated assets in the area of the proposed development, including both the array area and the export cable corridor. One scheduled monument: **Wine Tower, tower (SM90344)**, a 16<sup>th</sup> century tower, stands about 1km E of the landfall of the export cable corridor. Its presence should be noted in the EIA Report and an assessment of impact on its setting should be included in



that report, or in the EIA report for the onshore elements of the project (our case no: 300070578).

- We welcome that known offshore assets are dealt with thoroughly in table 15.2 and figure 15.2.
- Losses or casualties are described briefly at 15.3.34-38, but we note that they will be dealt with in more detail in the next phase of the project.
- We welcome that disturbance to paleo-environmental deposits, known and unknown cultural heritage assets is scoped into the forthcoming EIA Report.
- At 15.3.40, Fraserburgh Harbour should be noted as Canmore\_21119 and related records.

### **Further information**

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at [www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes](http://www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes). Technical advice is available on our Technical Conservation website at <https://www.engineshed.scot/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Mary MacLeod Rivett, who can be contacted by email on [mary.macleod@hes.scot](mailto:mary.macleod@hes.scot).

Yours sincerely

**Historic Environment Scotland**

Joint Radio Company

**From:** [JRC Windfarm Coordinations Old](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Iain Macdonald](#)  
**Subject:** SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024 [WF910016]  
**Date:** 30 January 2024 11:11:42

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Dear scottish,

A Windfarms Team member has replied to your co-ordination request, reference **WF910016** with the following response:

*Good Morning,*

*Many thanks for the information. Please can they supply positions and sizes when they have them? We are unable to comment without them.*

*Kindest Regards,*

*Heather Willoughby*

We hope this response has sufficiently answered your query.  
If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email by clicking on the link below or login to your account** for access to your co-ordination requests and responses.

<https://breeze.jrc.co.uk/tickets/view.php?id=32410>



Maritime & Coastguard Agency



Maritime &  
Coastguard  
Agency

Vinu John  
**Maritime and Coastguard Agency**  
UK Technical Services Navigation

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

19<sup>th</sup> February 2024

Mr. Iain MacDonald  
Marine Directorate- Licensing Operations Team  
Scottish Government, Marine Laboratory  
375 Victoria Road,  
Aberdeen, AB11 9DB

Our ref: SCOP0039

Dear Mr. MacDonald

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007  
(Collectively Referred to as the “EIA Regulations”)**

**Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site -  
Approximately 50km East of Wick.**

Thank you for the opportunity to comment on the Scoping Report for the **Stromar Offshore Wind Farm- Stromar Offshore Windfarm Limited**. The MCA has reviewed the report, as detailed in your email dated 18<sup>th</sup> January 2024. The MCA’s remit for offshore renewable energy development is to ensure that safety of navigation is preserved whilst progress is made towards government targets for renewable energy.

The EIA Report should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:

- Collision Risk
- Navigational Safety
- Visual intrusion and noise
- Risk Management and Emergency response
- Marking and lighting of site and information to mariners
- Effect on small craft navigational and communication equipment
- The risk to drifting recreational craft in adverse weather or tidal conditions.
- The likely squeeze of small craft into the routes of larger commercial vessels.

A Navigational Risk Assessment (NRA) will need to be submitted in accordance with MGN and the MCA’s Methodology for Assessing the Marine Navigation Safety & Emergency Response Risks of Offshore Renewable Energy Installations (OREI). This NRA should be accompanied by a detailed MGN 654 Checklist which can be downloaded from the MCA website at

<https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>

We note, from table 14.4 of the scoping report that the project intends to carry out a vessel traffic survey to the standard of MGN 654 i.e. at least 28 days which is to include seasonal data (two x 14-day surveys). We also note that the project intends to supplement this with long term AIS data.

The turbine layout design will require MCA approval prior to construction to minimise the risks to surface vessels, including rescue boats, and Search and Rescue aircraft operating within the site. Any additional navigation safety and/or Search and Rescue requirements, as per MGN 654 Annex 5, will be agreed at the approval stage.

Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g. rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the HDD location.

It is to be noted that regulatory mooring expectations should be identified as a potential mitigation and MCA can confirm this guidance should be followed and that a Third-Party Verification of the mooring arrangements will be required.

Particular consideration will need to be given to the implications of the site size and location on SAR resources and Emergency Response Co-operation Plans (ERCoP). Attention should be paid to the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)) that can cover the entire wind farm sites and their surrounding areas. A SAR checklist will also need to be completed in consultation with MCA.

It is noted that HVDC or HVAC transmission infrastructure maybe installed, If HVDC is being used consideration must be given to electromagnetic deviation on ships' compasses. The MCA would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five degrees will be attained. The MCA would however expect a deviation survey post the cable being laid; this will confirm conformity with the consent condition.

MGN 654 Annex 4 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report the survey or conduct it to Order 1a might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose.

Considering all the potential developments in the area, MCA is concerned regarding the general loss of navigable sea room, and we would request the applicant to factor in cumulative impacts into their NRA and for this assessment the applicant should consider all the projects in the vicinity specially the likes of Ayre, Buchan, Broadshore and Caledonia.

On the understanding that the Shipping and Navigation aspects are undertaken in accordance with MGN 654 and its annexes, along with a completed MGN checklist, MCA is likely to be content with the approach. As this project progress, we would welcome engagement with the developers, and early discussion on the points raised above.

Section 14.9 Scoping Questions to consultees asks some scoping questions to which our responses are as follows:

1. Do you agree with the study area defined for shipping and navigation?
  - Yes.
2. Do you agree with the use of data listed in Section 14.3, and any additional data listed in Section 14.8, being used to inform the Offshore EIAR?
  - Yes. We are content with the data listed in Section 14.3.
3. Are there any further data sources or guidance documents that should be considered?
  - No
4. Do you agree that all receptors (users) and potential impacts (hazards) related to shipping and navigation have been identified?
  - Yes.
5. Do you agree with the Scoping In of impact (hazards) in relation to shipping and navigation?
  - Yes.
6. Do you agree with the assessment of transboundary effects in relation to shipping and navigation?
  - Yes.
7. Do you agree with the assessment of cumulative effects in relation to shipping and navigation?
  - Yes, we have added specific renewables project the project shall consider while assessing cumulative impacts within our response.
8. Do you agree with the proposed assessment methodology for shipping and navigation?
  - Yes.
9. Do you agree on the suitability of the proposed commitments to reduce or eliminate LSE relevant to shipping and navigation?
  - Yes. However, we have noticed that most commitments included within table 14.2 are requirements under MGN-654 or otherwise secured through marine license conditions.
10. Do you have any additional comments relating to the use of floating WTG technology specifically, and potential associated additional commitment options (e.g., operational safety zones) in relation to navigational safety impacts?
  - No additional comments other than those covered in the response above.

Yours faithfully,  
[Redacted]

Vinu John

Navigation Policy Advisor

Marine Directorate – Science, Evidence, Data and Digital  
Commercial Fisheries Advice



E: [MD-SEDD-RE\\_Advice@gov.scot](mailto:MD-SEDD-RE_Advice@gov.scot)

Iain Macdonald  
Marine Directorate Licensing Operations Team  
Marine Laboratory  
375 Victoria Road  
Aberdeen  
AB11 9DB

**16 February 2024**

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site**

Marine Directorate advisers have reviewed the request from MD-LOT and provide the following advice.

**Commercial fisheries**

MD-SEDD note the presence of a >10m potting fleet active across the array area, and advise that the layout and spacing of turbines within the array area is designed to facilitate coexistence with this fleet where possible. The results of the static gear trials within the floating wind farm Hywind<sup>[1]</sup> suggest this could be a potential opportunity for coexistence, and alongside consultation with industry the trials could be useful for informing turbine spacing.

MD-SEDD refer to the impact of additional steaming times during the operation phase, which states that this effect will be localised to temporary safety zones for maintenance work. MD-SEDD advise that, depending on the turbine foundation type and array layout, the array area itself may also act as a physical barrier for fishing vessel steaming routes, and so this may permanently impact steaming routes during the operation phase. MD-SEDD advise that this



is also considered within the assessment of this impact.

MD-SEDD advise that the cumulative effects assessment takes into account any nearby Marine Protected Areas and other fisheries management areas with restricted fishing activity as potential developments that could cause cumulative effects for commercial fisheries.

### Data

MD-SEDD recommends that as well as the AIS Route Density the fishing activity should be shown and investigated using the Vessel Density available at EMODNet. website in order to show the amount of time that fishing vessels with AIS transmission are around the proposed development. Spatial data [LINK](#).

MD-SEDD recognises that Scotmap is a useful indication of the inshore fishing areas but suffers from being a few years out of date and inshore activity may have altered in the time passed. MD NMPi offers an up to date under 12 m vessel representation of activity based on fishery office knowledge via Fish 1 forms. Spatial data [LINK](#).

MD-SEDD agree that fisheries effort data that looks back five years into past activity will likely include effects brought on by the decrease in activity due to the COVID-19 pandemic and the effects this has had on the target species.

[1] [Floating wind - Equinor](#)

Yours sincerely,

### **Renewables and Ecology Team**

Marine Directorate – Science, Evidence, Data and Digital

Marine Directorate – Science, Evidence, Data and Digital  
Socioeconomics Advice



## Stromar Offshore Wind Farm – Scoping Response

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

The Stromar Offshore Wind Farm scoping report includes descriptions of a range of potential impacts. This response focuses only on the assessment of social and economic impacts.

We recommend that a full Socio-Economic Impact Assessment be scoped into the Environmental Impact Assessment. We provide general advice on how to deliver this in Annex 1.

#### **1. Overview**

##### *1.1. Study areas*

The study areas relevant to the assessment were identified in para 18.2.5 of the scoping report. Although at this stage port location and supply chain hubs have not been defined, the assessment of socio-economic impacts would benefit from the inclusions of a short list of potential epicentres of impact. This can help to define the affected communities, and aid stakeholder engagement and research with local communities.

##### *1.2. Consultation, stakeholder engagement, and primary data collection*

We noted the consultation activities that have been conducted to date (table 4.1), as well as the planned future engagement activities (as described in table 4.3).

We note the intention to establish a “stakeholder management plan” (as described in para 4.3.6). We hold that the engagement of stakeholders (including local communities) is very important for the assessment of socio-economic impacts, as these communities might be directly impacted by the development. As described in the Annex 1, we recommend conducting a stakeholder mapping exercise to identify all potential stakeholders who might be affected by the development. These stakeholders need to be engaged for identification and assessment of potential impacts (e.g. creation of a working group with local community councils where magnitude and sensitivity of socio-economic impacts is discussed).

It is important not only to inform members of the general public about the development but also gather their views of how they might be affected (primary data collection). We recommend that potential socio-economic impacts are discussed with members of the general public and their assessment is fed into the EIA report.

We encourage the developer to engage trained social scientists with experience in qualitative methods to conduct research and primary data collection with

communities to ensure that the social science research methods are designed and executed correctly so that the engagement is delivered in as ethical and meaningful way as possible.

### *1.3. Data sources*

Please provide a list of data sources used to assess potential socio-economic impacts (see Annex 1 for examples). Please use the most up-to-date data sources.

## **2. Scoping of impacts**

### *2.1. Social impacts*

We disagree with the scoping out of socio-cultural impacts. Although we note the concern around survey fatigue and support the desire to reduce burden on research participants, there are different means of conducting primary social research (e.g. citizens' juries might be used instead of large-scale surveys). Please refer to the [Methods Toolkit](#) we recommend to use.

Furthermore, we are open to developers working together to mitigate the issue of stakeholder fatigue. To provide an example, if different projects are anticipated to create cumulative socio-economic impacts within certain areas and epicentres of impact, the stakeholder engagement and social research regarding these cumulative impacts as well as the socio-economic impact assessment could be shared between the developers.

### *2.2. Economic impacts*

We broadly agree with the scoping report's proposed approach for assessing economic impacts. It is welcomed that the assessment will include direct, indirect and induced impacts and this should be included for all phases of the project. In addition, it would be useful if the license application takes into account deadweight loss, leakage, displacement and substitution. The inclusion of sensitivity analysis to account for risk, uncertainty and optimism bias is also encouraged, in line with our guidance shown in Annex 1.

It's pleasing to see that employment impacts will be assessed at each phase of the project. It would be useful to analyse employment affects in terms of years of employment and jobs. If it is possible to supply additional information about the types of jobs that are expected to be created (e.g. part-time, full-time, skilled, unskilled etc) and how these compare to the existing jobs in the study area, this will add further depth to the analysis.

We expect to see a detailed description of the methodology used to assess economic impacts in the EIA, including specific details about the methodological approach taken and any key assumptions that underpin any estimates. This may be supplied in a technical annex if necessary.

### **3. Conclusions**

We broadly agree with the scoping report's proposed approach for assessing economic and social impacts. However, we disagree with the scoping out of socio-cultural impacts. We would like to encourage the developer to conduct more engagement and social research with local communities. We recommend that you employ a social researcher with qualitative research expertise to collect primary data from communities to understand their responses to potential socio-economic changes resulting from the development.

# **Annex 1: General Advice for Socio-Economic Impact Assessment**

## **Marine Analytical Unit (MAU)**

### **Marine Directorate**

#### **December 2023**

This document sets out some suggestions for delivering socio-economic impact assessment drawing on the professional expertise of the Marine Analytical Unit (MAU), Marine Directorate.

### **Section 1. Some general best practice tips**

- Take a proportionate approach to SEIA in line with the size and generating capacity of the development
- Consider offshore and onshore components of the development in the same assessment.
- Employ experts to design and carry out the assessment. The relevant expertise would include:
  - Social research and economist training, qualifications and experience
  - Familiarity and experience with appropriate methods for each discipline (including economic appraisal, social research methods such as surveys, sampling, interviews, focus groups and participatory methods)
- Consider potential secondary socio-economic impacts of any changes that affect the other relevant receptor groups covered in the wider EIA e.g. commercial fisheries, cultural heritage and archaeology and visual impacts.
- Include consideration of the cumulative impact of multiple offshore developments.
- Outline the rationale for scoping out impacts that are deemed to be minimal, including any evidence or analysis that has been used. If this is not provided it can be difficult for MAU to understand why impacts have been scoped out and we may suggest scoping them back in.

### **Section 2. Key components of a Socio-economic Impact Assessment**

We set out below what we consider to be the key steps to an assessment. We recommend a combined approach so that social and economic impacts are covered together in the assessment, whilst acknowledging that different methodologies for social and economic impacts assessment are needed at certain stages, and that the two disciplines are distinct.

We wish to highlight the importance of stakeholder engagement throughout the assessment, and the use of social research methods (see Methods Toolkit referenced at the end of this Annex) to gather primary data and first hand perspectives from particular groups and communities that are affected. These are helpful in order to better understand the nature and degree of impacts that might be caused by changes that are expected to occur. A change in itself may or may not bring about tangible impact, impacts may vary for different people or be perceived in different ways, are affected by individual values and attitudes, and conditioned by the context.

Stakeholder engagement and data collection can occur at a number of stages in the SEIA process and may involve similar methodologies but there are important differences to note. The primary aims of stakeholder engagement are to inform, consult or involve key stakeholders, and to communicate information and gather feedback. Data collection, in contrast is a more rigorous analytical process involving:

- Setting out a planned methodology in advance with clear objectives of what you wish to achieve through data collection
- Sampling strategies that take account of the demographic variations in the population and the need to include difficult to reach groups
- Robust methods to collect information from people in a neutral and unbiased way
- Awareness of how data will be analysed and reported on to obtain and disseminate robust conclusions
- Taking account of research ethics including informed consent, and data protection requirements under GDPR

The stages below are divided into the activities that we suggest are **before** the developer submits a request for a scoping opinion and those that are done **after** the scoping phase. We recommend an iterative approach which means that steps inform each other, information is built up over time, and some steps may be repeated or done in a different order.

The key steps should include:

### **Pre-scoping activities**

- 1) Getting started:** Employ economist and social research experts and work with them to develop a plan for the SEIA that sets out data requirements, and the proposed social and economic data collection and impact assessment methodologies, timescales, any data protection considerations, risk assessment and ethical issues that might arise from the work.
- 2) Develop a detailed description** of the planned development and consider the project phases where socio-economic impacts might be experienced (covering development, construction, operation and maintenance and decommissioning phases). Start to map out potential socio-economic impacts and initial consideration of areas of impact on land that will need to be covered.
- 3) Initial scoping of impacts:** develop a broad list of potential impacts informed by experts (including social researcher, economist, local representatives from key groups, community stakeholders and others).
- 4) Define potential impact areas on land** taking into account locations and connections between activities. Different types of impacts may be experienced at different geographic levels, some in the area nearest the landfall or the nearest coastline to the development at sea, and others much further away (at Scotland level, UK level and internationally). The geographical scale at which social impacts are experienced may be different for social impacts compared with economic impacts. There may be multiple epicentres from which impacts radiate

including the site of the development, land-based areas such as landfall and grid connections, construction bases and places from which the development is visible. Activities that take place in the sea are also relevant for defining the impact area on land, for example the location of fishing activity and ports where fish are landed. The definition of the impact area will inform which communities and which sectors are included in the assessment and vice versa, so this exercise needs to be done iteratively with step 3, the initial scoping of impacts.

- 5) **Stakeholder mapping** is required to identify all the people, groups and stakeholders who may be affected by the development and is a first step in order to conduct effective stakeholder engagement. This exercise is informed by the definition of the impact area. A broad approach is recommended. Stakeholders are likely to include local communities, businesses, workers, other users of the sea, interest groups, community councils and so on.

**Steps 4 and 5 may lead to a change in the list of potential impacts so this will need refined/checked.**

- 6) **Stakeholder engagement (with those affected by the development, sea users, communities etc)** is a key requirement of SEIA that is done at different stages of the process. We recommend doing some initial stakeholder engagement before submitting the scoping report. Stakeholder engagement will fulfil a number of requirements:

- **Provide information about the development** so that those who might be affected are able to make an informed judgement about potential impacts
- **Present and refine list of potential impacts based on feedback** - identify impacts that are most relevant and add any additional ones that are identified
- **Collect initial data/ insights from stakeholders** on what potential socio-economic impacts (to be developed later)
- **Build relationships** with the community and key groups affected for later stages of the SEIA process so that they can understand the decisions making process and how they can influence it.

There are many **participatory methodologies** that can be used for effective stakeholder engagement that provide a deliberative space for community discussions.

This stage may also require the setting up of governance structures and a community liaison officer. **Early engagement** with those who might be affected is very important, as is meaningful and inclusive engagement where people feel that they are being listened to and that their feedback will be acted upon. It is important to set out clearly how stakeholder engagement is being done for the SEIA specifically.

- 7) **Gather contextual information** to develop a social and economic profile of the area prior to the development that will help with setting the baseline and impact

prediction, identifying potential industries and communities that might be affected and sources of data that can be used in the assessment. This might include primary data collection using social research methods (such as surveys, interviews, focus groups) as well as desk based analysis (of existing data sets such as fishing data, population data).

Primary data collection may occur alongside participatory activities (e.g. engagement events) but must be done in a rigorous and systematic fashion and the findings should be robustly analysed and incorporated into the SEIA. Impacts that are identified for the other receptors in the wider EIA may also have socio-economic consequences and so it may be important to include these in the SEIA.

#### **8) Produce list of anticipated impacts to be covered in the scoping report**

setting out the range of potential impacts that could occur, building on what has already been done using data and insights that have been collected from various activities described above. Details of the methods that have been used should be included to enable Marine Directorate to determine if the analysis is based on a robust and appropriate approach. Justification should be provided for any impacts that are scoped in or out. This could be based on suggestions made by stakeholders and the public during stakeholder engagement or an assessment based on the analysis of primary and secondary data.

It is helpful if the scoping report includes details on the approach to be used for the SEIA including methods for data collection, planned stakeholder engagement activities and data-sets to be used.

#### **Post scoping activities for the SEIA**

The scoping opinion will advise on the final list of socio-economic impacts to be assessed in the SEIA. This may require additional data collection/ social research to enable a more rigorous assessment of a narrower set of anticipated impacts. It may also require further stakeholder engagement in order to check the significance of impacts with different groups, and the acceptability of mitigation options.

The data and information that has been collected throughout the scoping phase will be used to conduct steps 9, 10 and 11 below.

#### **9) Conduct baseline analysis** to assess the situation in the absence of the development, to provide a point of comparison against which to predict and monitor change. Appropriate social and economic measures should be used for the baseline and cover relevant issues (see section 4 for suggested data sources). Key stakeholders and other interested parties including affected communities and sectors may be aware of baseline data to be included, and this can be explored in the participatory approaches described above. The findings from social research can also be included in the baseline. Note that baseline data can be presented in the scoping report but is also the first stage of the SEIA and so should be included in the SEIA report.

**10) Predict impacts and assess their significance (otherwise known as impact appraisal or options appraisal):** Through analysis, estimate the social and economic changes and their expected impacts, considering any alternative development options and how significant the impacts might be. This is the core part of the assessment and forms the main part of the assessment report. Different methodologies and both primary and secondary data inform this part of the exercise.

Different phases of the development should be covered (development, construction, operation and maintenance) and also transitions between phases (if relevant).

The knock on socio-economic consequences of impacts in other parts of the EIA assessment should be assessed here, such as the impact on commercial fisheries, and impacts on related industries such as tourism could also be included.

It is important to consider distribution of impacts among different social groups (covering protected quality characteristics, socio-economic groups and geographic area where relevant to do so).

Economic impact appraisal should include consideration of:

- Direct, indirect and induced impacts
- Leakage, displacement and substitution effects
- Deadweight loss
- Cumulative impacts
- Sensitivity analysis to account for risk, uncertainty and optimism bias

There are a range of methodologies for calculating direct, indirect and induced impacts. These include the appropriate use of multipliers, a local content methodology, stakeholder involvement and expert opinion.

Modelling approaches should be realistic, based on robust data, and avoid over promising the economic impacts.

All prices should be presented in real terms (excluding inflation) and should state which year the prices represent.

## **11) Development enhancement, mitigation strategy and complete SEIA report.**

There may be an opportunity for adaptation or other approaches to mitigate potentially adverse impacts and to maximise positive opportunities. This may include engagement with the community to develop a strategy for enhancing benefits and mitigating against impacts; or development of a Community Benefit Agreement (CBA). Again these activities should be done collaboratively with stakeholders where relevant and appropriate.

The SEIA report should clearly set out the methods used in the assessment, justification for decision made such as scoping certain impacts in or out of the



assessment, and the approach to analysis. The report should cover the baseline analysis and results of the impact prediction or appraisal, and distributional impacts. Social and economic impacts can be set out separately (where this makes sense) and together where they overlap.

It is good practice for the report to be reviewed by the people (i.e. the wider group of stakeholders and communities) who were involved in providing data for its production.

### **Section 3. Examples of different types of socio-economic impacts**

In the literature social and economic impacts are defined in many different ways. Sometimes social and economic impacts are covered separately, whilst other sources refer to socio-economic impacts.

The following table sets out some commonly identified socio-economic impacts.

#### **Examples of Socio-economic Impacts from Glasson 2017<sup>1</sup>**

##### **1. Direct economic:**

- GVA
- employment, including employment generation and safeguarding of existing employment;
- characteristics of employment (e.g. skill group);
- labour supply and training; and
- other labour market effects, including wage levels and commuting patterns.

##### **2. Indirect/induced/wider economic/expenditure:**

- employees' retail expenditure (induced);
- linked supply chain to main development (indirect);
- labour market pressures;
- wider multiplier effects;
- effects on existing commercial activities (eg tourism; fisheries);
- effects on development potential of area; and

##### **3. Demographic:**

- changes in population size; temporary and permanent;
- changes in other population characteristics (e.g. family size, income levels, socio-economic groups); and
- settlement patterns

##### **4. Housing:**

- various housing tenure types;

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<sup>1</sup> Glasson J (2017a) "Socio-economic impacts 2: Overview and economic impacts" in Therivel R and Wood G (eds.), *Methods of Environmental and Social Impact Assessment*, Abingdon: Routledge

- public and private;
- house prices and rent / accommodation costs;
- homelessness and other housing problems; and
- personal and property rights, displacement and resettlement

#### 5. Other local services:

- public and private sector;
- educational services;
- health services; social support;
- others (e.g. police, fire, recreation, transport); and
- local authority finances

#### 6. Socio-cultural:

- lifestyles/quality of life;
- gender issues; family structure;
- social problems (e.g. crime, ill-health, deprivation);
- human rights;
- community stress and conflict; integration, cohesion and alienation; and
- community character or image

#### 7. Distributional effects:

Distributional analysis is a term used to describe the assessment of the impact of interventions on different groups in society. Interventions may have different effects on individuals according to their characteristics such as income level or geographical location

- effects on specific groups in society (eg: by virtue of gender, age, religion, language, ethnicity and location); environmental justice

### Section 4: Useful Data Sources for Socio-Economic Impact Assessments

Name	Summary	Link to Source
Statistics.gov.scot	Contains a wide range of data by local authority and other geographic breakdowns. Has a search by subject and area option.	<a href="https://statistics.gov.scot">statistics.gov.scot</a>
Marine Economic Statistics, 2019	Annual economic statistics publication including GVA and employment data for marine economy sectors.	<a href="https://www.gov.scot/Topics/Statistics/Scotland/2019/marine">Scotland's Marine Economic Statistics 2019 - gov.scot (www.gov.scot)</a>

<p>Scottish Sea Fisheries Statistics, 2021</p>	<p>Provides data on the tonnage and value of all landings of sea fish and shellfish by Scottish vessels, all landings into Scotland, the rest of the UK and abroad, and the size and structure of the Scottish fishing fleet and employment on Scottish vessels.</p>	<p><a href="http://www.gov.scot">Summary - Scottish Sea Fisheries Statistics 2021 - gov.scot (www.gov.scot)</a></p>
<p>Scottish Shellfish Farm Production Survey 2021</p>	<p>Statistics on employment, production and value of shellfish from Scottish shellfish farms.</p>	<p><a href="http://www.gov.scot">Scottish Shellfish Farm Production Survey 2021 - gov.scot (www.gov.scot)</a></p>
<p>Scottish Annual Business Statistics 2020</p>	<p>Scottish Annual Business Statistics (SABS) presents estimates of employment, turnover, purchases, Gross Value Added and labour costs. Data are provided for businesses that operate in Scotland. Data are classified according to the industry sector, location and ownership of the business.</p>	<p><a href="http://www.gov.scot">Scottish Annual Business Statistics 2020 - gov.scot (www.gov.scot)</a></p>
<p>Sub-Scotland Economic Statistics Database</p>	<p>The Sub-Scotland Economic Statistics Database provides economic, business, labour market and population data for Scotland, and areas within Scotland.</p>	<p><a href="http://www.gov.scot">Sub-Scotland Economic Statistics Database - gov.scot (www.gov.scot)</a></p>
<p>Nomis Official Labour Market Statistics</p>	<p>Labour market statistics including data on employment, unemployment, qualifications, earnings etc.</p>	<p><a href="http://nomisweb.co.uk">Nomis - Official Labour Market Statistics (nomisweb.co.uk)</a></p>
<p>Economics of the UK Fishing Fleet 2020</p>	<p>Economic estimates at UK, home nation and fleet segment level for the UK fishing fleet. The estimates are calculated based on samples of fishing costs and earnings gathered by Seafish as part of the 2020 Annual Fleet Economic Survey.</p>	<p><a href="#">Economics of the UK Fishing Fleet 2020 — Seafish</a></p>

Scotland's Census, National Records of Scotland	Census data that provides information about the characteristics of people and households in the country.	<a href="https://www.nrscotland.gov.uk">Scotland's Census   National Records of Scotland (nrscotland.gov.uk)</a>
Scottish Index of Multiple Deprivation	Collection of documents relating to the Scottish Index of Multiple Deprivation - a tool for identifying areas with relatively high levels of deprivation.	<a href="https://www.gov.scot">Scottish Index of Multiple Deprivation 2020 - gov.scot (www.gov.scot)</a>
The Green Book	HM Treasury guidance on how to appraise and evaluation policies, projects and programmes.	<a href="https://www.gov.uk">The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk)</a>
The Magenta Book	HM Treasury guidance on evaluation. Chapter 4 provides specific guidance on data collection, data access and data linking.	<a href="https://www.gov.uk">The Magenta Book - GOV.UK (www.gov.uk)</a>
Enabling a Natural Capital Approach (ENCA)	Supplementary guidance to The Green Book. ENCA resources include data, guidance and tools to help understand natural capital and know how to take it into account.	<a href="https://www.gov.uk">Enabling a Natural Capital Approach (ENCA) - GOV.UK (www.gov.uk)</a>

## Section 5: Further sources of guidance:

HM Treasury guidance on how to appraise and evaluate policies, projects and programmes: [The Green Book: appraisal and evaluation in central government](https://www.gov.uk)

Best practice in Social Impact Assessment according to the International Association for Impact Assessment: [Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects](https://www.iaia.org)

The project A two way Conversation with the People of Scotland on the Social Impacts of Offshore Renewables (CORR/5536) has developed elements of a conceptual framework on social values that can be used to support and inform existing processes for assessing the potential social impacts of offshore renewables plans: [Offshore renewables - social impact: two way conversation with the people of Scotland](https://www.gov.uk)

Best practice guidance for assessing the socio-economic impacts of OWF developments: [Guidance on assessing the socio-economic impacts of offshore wind farms \(OWFs\)](https://www.gov.uk)

[A toolkit of methods available to assist developers, consultants, and researchers carrying out socio-economic impact assessments: Methods Toolkit for Participatory Engagement and Social Research - gov.scot \(www.gov.scot\)](https://www.gov.scot)

Ministry of Defence  
Defence Infrastructure Organisation



**Defence  
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14 March 2024

Your Reference: SCOP - 040

Our Reference: DIO 10061489

Dear Paul,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017  
(Collectively referred to as the "EIA Regulations").**

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping Opinion request in respect of the Stromar Offshore Windfarm proposal received by this office on 18 January 2024. I write to confirm the safeguarding position of the MOD on the information that should be provided in the "Stromar Offshore Wind Farm Environmental Impact Assessment: Offshore Scoping Report" to support any application.

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

It is acknowledged that, at this time, details of the precise location, dimensions, and configuration of the turbines and associated infrastructure is not available and that a project design envelope (PDE) approach has been adopted for this array project. The components of the array project will include the following:

- Up to 71 WTGs;
- Floating WTG foundation substructures;
- Mooring and anchoring systems;
- Inter-array/interlink cables (including dynamic and static parts);

- Scour and/or cable protection;
- Up to three OSSs;
- One RCS (if HVAC technology is selected);
- One Offshore Innovation Platform;
- One Accommodation Platform; and
- Up to three Offshore Export Cable(s).

The maximum blade tip height of the wind turbines (metres (m) above Highest Astronomical Tide (HAT) is expected to be no greater than 385, with a maximum rotor diameter of 320m.

I write to confirm the safeguarding position of the MOD on information that should be provided in the Environmental Statement to support any application, this response is based on the "Stromar Offshore Wind Farm Environmental Impact Assessment: Offshore Scoping Report" dated January 2024 (Document Reference. 08468168) which recognises some of the principal defence issues that will be of relevance to the progression of the proposed development.

### **Air Defence Radar**

Chapter 16 Military and Civil Aviation Paragraph 16.3.25 references the MOD's Air Defence (AD) Radars.

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

Within paragraph 16.3.25 of Chapter 16 it is stated that the nearest military air defence radar is located at Remote Radio Head (RRH) Buchan which is approximately 105.40km from the closest point of the scoping array

The MOD has undertaken an assessment based on 71 wind turbines at 385m to tip height using the Rochdale Envelope boundary co-ordinates. Turbines within the array area will be detectable to the AD Radar at RRH Buchan. The impact of the turbines on the AD radar at RRH Buchan will therefore need to be addressed through a suitable technical mitigation solution. It is the applicant's responsibility to provide a suitable technical mitigation solution to the MOD.

### **Air Traffic Control**

Chapter 16 Military and Civil Aviation paragraph 16.2.23 references the MOD's Air Traffic Control (ATC) Radars.

This paragraph acknowledges the Primary Surveillance Radar (PSR) at RAF Lossiemouth (103 km). It acknowledges the potential for this PSR to detect operational wind turbines within the scoping array. The MOD assessment concludes that there will be no operational impact.

### **Military Low Flying**

The scoping array is located within LFA 14, an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The

addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

To mitigate any potential impact, it is common practice that the MOD will request that a Requirement is added to any Development Consent Order that might be issued requiring the submission of information such as commencement dates, maximum turbine heights and the longitude and latitude of each wind turbine. This information is required to allow accurate charting of the development.

In Table 14.2: The proposed commitments relevant to Shipping and Navigation, commitment code C-OFF-33, the developer identifies the development and adherence of a Lighting and Marking Plan (LMP). The MOD should be consulted and will request that the aviation warning lighting requirements is added as a Requirement to any Development Consent Order that might be issued.

### **Danger Areas**

In Chapter 16 Civil and Military Aviation paragraphs 16.3.18, 16.3.19 and 16.3.20, the developer has identified that the array lies within the Moray Firth Danger Area EGD809C and EGD809S, Northern Managed Danger Area (MDA) EGD712D and the Tain Danger Area, EGD703.

The proximity of danger areas associated with Ordnance munitions explosives, unmanned aircraft systems and high energy manoeuvres at Moray Firth (EGD809C, EGD809S) and Tain (EGD703) are noted along with the parameters in chapter 16. The applicant should be advised to take into account the published MOD practice and exercise areas in preparation of their development proposal.

The MOD has assessed that the development will have no impact on the Northern Managed Danger Area EGD712D.

### **Practice and Exercise Areas (PEXA)**

Practice and Exercise Areas also known as PEXA, are designated areas of the sea where military exercises can be undertaken. Chapter 16 Civil and Military Aviation Paragraph 16.3.22 states that the scoping array project is not contained within the vertical limits of any military PEXA and, therefore military PEXA is scoped out of the EIA. The MOD agrees with this statement in relation to PEXA.

### **Unexploded Ordnance (UXO)**

The potential for unexploded ordnance (UXO) to be present within the development area and the necessity for clearance should be considered. The potential presence of UXO and disposal sites should be a consideration during the installation and decommissioning of turbines, cables, and any other infrastructure, or where other intrusive works are necessary.

### **Highly Surveyed Routes**

The MOD has highly surveyed routes within the locality of the development area which may be relevant to the installation of wind turbines, export cables & associated infrastructure. These routes are retained by the MOD to support national defence requirements and are not defined in the public domain. Highly surveyed routes must not be obstructed or impeded by offshore developments such as wind turbines. At this time, we are unable to advise if the development will impede any highly surveyed routes in the area. An assessment to determine any impact has been requested and we will share the results with you as soon as we are able to.



MOD Safeguarding wishes to be consulted and notified about the progression of this proposal and any subsequent application(s) that may be submitted relating to it to verify that it will not adversely affect defence interests.

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

Yours faithfully  
[Redacted]

Kaye Noble  
Assistant Safeguarding Manager  
DIO Safeguarding

# NATS - Technical and Operational Assessment

# Technical and Operational Assessment (TOPA)

For Stromar Offshore Wind Farm –  
Scotwind NE3 Site

NATS ref: SG34520

Issue 2

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## Publication History

Issue	Month/Year	Change Requests and summary
1	January 2023	Combined Pre-Planning Assessment 2
2	January 2024	Scoping Request

## Document Use

External use: Yes

## Referenced Documents

# 1. Background

## 1.1. En-route Consultation

NATS en-route plc is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of RADAR's, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and as such assesses the potential impact of every proposed development in the UK.

The technical assessment sections of this document define the assessments carried out against the development proposed in section 3.

## 2. Scope

This report provides NATS En-Route plc's view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS RADAR used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS' statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

### 3. Application Details

Scottish Government submitted a request for a NATS technical and operational assessment (TOPA) for the development at Stromar Offshore Wind Farm – Scotwind NE3 Site. It will comprise turbines as detailed in Table 1 and contained within an area as shown in the diagrams contained in Appendix B.

Turbine	Lat	Long	East	North	Hub (m)	Tip (m)
1	58.5350	-2.0935	394657	960772	225	385
2	58.4875	-2.1276	392660	955484	225	385
3	58.5105	-2.1854	389296	958051	225	385
4	58.4924	-2.1955	388700	956044	225	385
5	58.5774	-2.1089	393767	965492	225	385
6	58.5460	-2.1531	391189	961996	225	385
7	58.5825	-2.2040	388240	966073	225	385
8	58.6149	-2.1216	393033	969670	225	385
9	58.4988	-2.0545	396925	956739	225	385
10	58.4606	-2.0931	394668	952487	225	385
11	58.5751	-2.2373	386298	965256	225	385
12	58.4602	-2.1668	390367	952448	225	385
13	58.5612	-2.2539	385328	963708	225	385
14	58.5749	-2.1522	391250	965224	225	385
15	58.5496	-2.1227	392960	962398	225	385
16	58.5894	-2.1342	392299	966830	225	385
17	58.4166	-2.1299	392509	947588	225	385
18	58.5248	-2.2216	387193	959653	225	385
19	58.5029	-2.2201	387275	957213	225	385
20	58.4991	-2.1671	390359	956781	225	385
21	58.5223	-2.1141	393451	959358	225	385
22	58.4508	-2.1288	392581	951392	225	385
23	58.5303	-2.1852	389314	960255	225	385
24	58.4345	-2.1371	392094	949581	225	385
25	58.5439	-2.2467	385740	961780	225	385
26	58.4293	-2.0825	395282	948997	225	385
27	58.5530	-2.1871	389213	962781	225	385
28	58.6103	-2.1480	391499	969159	225	385
29	58.5052	-2.1278	392653	957459	225	385
30	58.4696	-2.1144	393426	953486	225	385
31	58.5305	-2.1356	392206	960269	225	385
32	58.5963	-2.1976	388616	967604	225	385
33	58.4704	-2.1891	389070	953589	225	385
34	58.5521	-2.2145	387617	962687	225	385
35	58.5862	-2.1740	389981	966477	225	385
36	58.5137	-2.0815	395351	958401	225	385
37	58.5669	-2.1262	392756	964324	225	385
38	58.5900	-2.2393	386185	966917	225	385
39	58.4860	-2.0809	395383	955318	225	385
40	58.5509	-2.0930	394689	962545	225	385
41	58.4362	-2.1677	390309	949780	225	385
42	58.5975	-2.1105	393678	967733	225	385

43	58.5186	-2.1624	390638	958949	225	385
44	58.4105	-2.0975	394403	946904	225	385
45	58.4797	-2.1560	391001	954615	225	385
46	58.5683	-2.2001	388462	964489	225	385
47	58.4100	-2.0661	396238	946847	225	385
48	58.6069	-2.1742	389975	968787	225	385
49	58.4465	-2.0745	395751	950909	225	385
50	58.4207	-2.1573	390912	948045	225	385
51	58.4662	-2.1408	391886	953114	225	385
52	58.5107	-2.0362	397988	958062	225	385
53	58.4973	-2.0352	398050	956564	225	385
54	58.4838	-2.0342	398107	955066	225	385
55	58.4768	-2.0555	396865	954292	225	385
56	58.4689	-2.0703	395996	953412	225	385
57	58.4566	-2.0598	396611	952043	225	385
58	58.4444	-2.0493	397224	950674	225	385
59	58.4321	-2.0387	397838	949306	225	385
60	58.4195	-2.0297	398365	947909	225	385
61	58.4061	-2.0286	398427	946411	225	385
62	58.3969	-2.0359	398003	945390	225	385
63	58.3975	-2.0615	396505	945454	225	385
64	58.3980	-2.0871	395005	945520	225	385
65	58.3985	-2.1128	393507	945578	225	385
66	58.3990	-2.1384	392008	945629	225	385
67	58.3994	-2.1641	390508	945679	225	385
68	58.4114	-2.1737	389952	947017	225	385
69	58.4240	-2.1826	389434	948425	225	385
70	58.4367	-2.1914	388924	949836	225	385
71	58.4493	-2.2005	388397	951240	225	385
72	58.4619	-2.2096	387873	952645	225	385
73	58.4745	-2.2185	387355	954052	225	385
74	58.4872	-2.2275	386836	955460	225	385
75	58.4998	-2.2364	386319	956868	225	385
76	58.5124	-2.2454	385802	958276	225	385
77	58.5250	-2.2544	385285	959684	225	385
78	58.5377	-2.2631	384783	961098	225	385
79	58.5503	-2.2722	384259	962503	225	385
80	58.5629	-2.2812	383738	963909	225	385
81	58.5756	-2.2901	383228	965320	225	385
82	58.5862	-2.2888	383307	966502	225	385
83	58.5928	-2.2663	384621	967227	225	385
84	58.5993	-2.2437	385934	967951	225	385
85	58.6058	-2.2211	387249	968673	225	385
86	58.6123	-2.1985	388564	969394	225	385
87	58.6189	-2.1759	389880	970116	225	385
88	58.6254	-2.1533	391195	970837	225	385
89	58.6319	-2.1307	392509	971560	225	385
90	58.6352	-2.1105	393684	971932	225	385
91	58.6224	-2.1028	394128	970499	225	385
92	58.6095	-2.0951	394572	969067	225	385



93	58.5967	-2.0874	395017	967635	225	385
94	58.5838	-2.0798	395461	966202	225	385
95	58.5709	-2.0721	395906	964769	225	385
96	58.5581	-2.0644	396351	963337	225	385
97	58.5452	-2.0568	396796	961904	225	385
98	58.5324	-2.0491	397240	960472	225	385
99	58.5195	-2.0415	397685	959039	225	385
100	58.5107	-2.0362	397988	958062	225	385

**Table 1 – Turbine Details**

## 4. Assessments Required

The proposed development falls within the assessment area of the following systems:

En-route Surv	Lat	Long	nm	km	Az (deg)	Type
Alanshill Radar	57.6431	-2.1655	45.5	84.2	144.8	CMB
Perwinnes Radar	57.2123	-2.1309	71.3	132.1	190.5	CMB
En-route Nav	Lat	Long	nm	km	Az (deg)	Type
None						
En-route AGA	Lat	Long	nm	km	Az (deg)	Type
None						

**Table 2 – Impacted Infrastructure**

## 4.1. En-route RADAR Technical Assessment

### 4.1.1. Predicted Impact on Alanshill RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

### 4.1.2. En-route operational assessment of RADAR impact

Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

Unit or role	Comment
Aberdeen En-route (Offshore) ATC	Unacceptable
Prestwick Centre ATC	Unacceptable
Military ATC	Unacceptable

*Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected RADAR, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.*

## 4.2. En-route Navigational Aid Assessment

### 4.2.1. Predicted Impact on Navigation Aids

No impact is anticipated on NATS' navigation aids.

## 4.3. En-route Radio Communication Assessment

### 4.3.1. Predicted Impact on the Radio Communications Infrastructure

No impact is anticipated on NATS' radio communications infrastructure.

## 5. Conclusions

### 5.1. En-route

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable.

## Appendix A – Background RADAR Theory

### Primary RADAR False Plots

When RADAR transmits a pulse of energy with a power of  $P_t$  the power density,  $P$ , at a range of  $r$  is given by the equation:

$$P = \frac{G_t P_t}{4\pi r^2}$$

Where  $G_t$  is the gain of the RADAR's antenna in the direction in question.

If an object at this point in space has a RADAR cross section of  $\sigma$ , this can be treated as if the object re-radiates the pulse with a gain of  $\sigma$  and therefore the power density of the reflected signal at the RADAR is given by the equation:

$$P_a = \frac{\sigma P}{4\pi r^2} = \frac{\sigma G_t P_t}{(4\pi)^2 r^4}$$

The RADAR's ability to collect this power and feed it to its receiver is a function of its antenna's effective area,  $A_e$ , and is given by the equation:

$$P_r = P_a A_e = \frac{P_a G_r \lambda^2}{4\pi} = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4}$$

Where  $G_r$  is the RADAR antenna's receive gain in the direction of the object and  $\lambda$  is the RADAR's wavelength.

In a real world environment this equation must be augmented to include losses due to a variety of factors both internal to the RADAR system as well as external losses due to terrain and atmospheric absorption.

For simplicity these losses are generally combined in a single variable  $L$

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4 L}$$

## Secondary RADAR Reflections

When modelling the impact on SSR the probability that an indirect signal reflected from a wind turbine has the signal strength to be confused for a real interrogation or reply can be determined from a similar equation:

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r_t^2 r_r^2 L}$$

Where  $r_t$  and  $r_r$  are the range from RADAR-to-turbine and turbine-to-aircraft respectively. This equation can be rearranged to give the radius from the turbine within which an aircraft must be for reflections to become a problem.

$$r_r = \sqrt{\frac{\lambda^2}{(4\pi)^3}} \sqrt{\frac{\sigma G_t G_r P_t}{r_t^2 P_r L}}$$

## Shadowing

When turbines lie directly between a RADAR and an aircraft not only do they have the potential to absorb or deflect, enough power such that the signal is of insufficient level to be detected on arrival.

It is also possible that azimuth determination, whether this done via sliding window or monopulse, can be distorted giving rise to inaccurate position reporting.

## Terrain and Propagation Modelling

All terrain and propagation modelling is carried out by a software tool called ICS Telecom (version 11.1.7). All calculations of propagation losses are carried out with ICS Telecom configured to use the ITU-R 526 propagation model.

## Appendix B – Diagrams

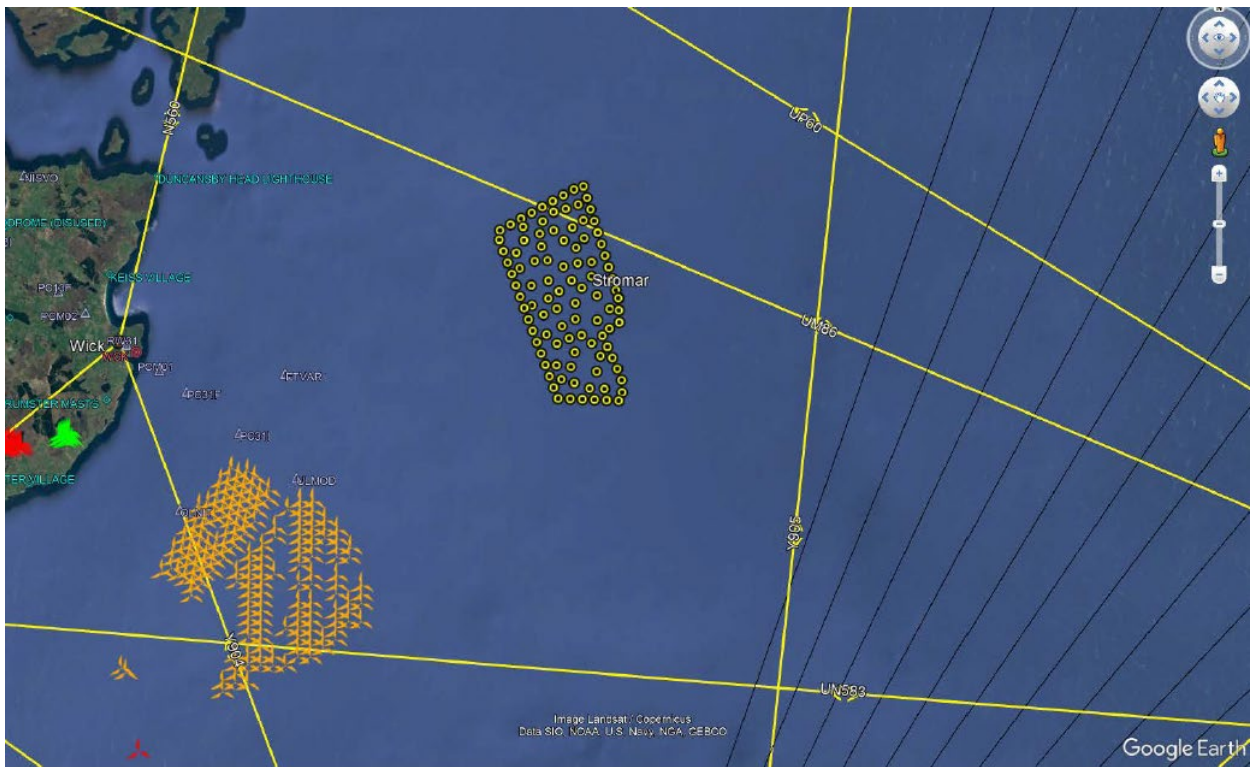


Figure 1: Proposed development location shown on an airways chart



NATS

**From:** [NATS Safeguarding](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Ben Walker](#)  
**Subject:** RE: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024 [SG34520]  
**Date:** 24 January 2024 10:05:53  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[SG34520 Stromar Offshore Wind Farm Scotwind NE3 Site- TOPA - Issue 2.pdf](#)

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Our Ref: SG34520

Dear Sir/Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA SG34520.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries, please contact us using the details below.

Yours faithfully

**NATS**

NATS Safeguarding

E: [natssafeguarding@nats.co.uk](mailto:natssafeguarding@nats.co.uk)

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL

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



NATS Public

---

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

**Sent:** Thursday, January 18, 2024 9:47 AM

**To:** MD.MarineRenewables@gov.scot

**Cc:** Rosanne.Dinsdale@gov.scot; Ben.Walker@gov.scot

**Subject:** [EXTERNAL] SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

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Dear Sir/Madam,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)**

**(SCOTLAND) REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

(collectively referred to as the “EIA Regulations”).

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Approximately 50km East of Wick**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Stromar Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Stromar Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal (“HRA”) Screening Report. The HRA Screening Report provides information to enable the screening of the Stromar Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **19 February 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a “nil return” response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Yours faithfully,

Iain

**Iain MacDonald**

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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Natural England

Date: 13 February 2024  
Our ref: 463826  
Your ref: SCOP-0039



Marine Scotland  
Scottish Government  
Atlantic Quay  
Glasgow  
G2 8LU

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Sir/Madam

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Approximately 50km East of Wick**

Thank you for your consultation which we received 18th January 2024 consulting Natural England on the Stromar Environmental Impact Assessment (EIA) Scoping Report and Habitat Regulations Appraisal (HRA) Screening Report. The following constitutes Natural England's formal statutory response. This is without prejudice to any comments we may wish to make in light of further submissions or on the presentation of additional information.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). We have delegated responsibility from JNCC to also advise on offshore wind farms in all English waters out to 200 nautical miles or the median line. As the application is located outside English waters, advice from NatureScot and JNCC, the statutory nature conservation bodies for Scottish waters, should be sought.

The response in this letter is based on the consultation documents received:

- 240110\_-\_scotwind\_ne3\_-\_stromar\_-\_scoping\_-\_scoping\_opinion\_-\_scoping\_report
- 240110\_-\_scotwind\_ne3\_-\_stromar\_-\_scoping\_-\_scoping\_opinion\_-\_hra\_screening\_report
- 240110\_-\_scotwind\_ne3\_-\_stromar\_-\_scoping\_-\_scoping\_opinion\_-\_appendices\_0

Due to our remit, we have limited our advice to Chapters 10 (Fish and Shellfish Ecology), 11 (Offshore Ornithology) and 12 (Marine Mammals) in the Scoping Report and the relevant sections to these within the HRA Screening Report. Within these bounds we have also restricted our advice to species from English Marine Protected Areas and to species in English waters. We defer to NatureScot and JNCC for advice on Scottish matters.

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

**General advice**

We would like to direct the applicant to our advice on the [environmental considerations and use of data and evidence to support offshore wind and cable projects in English waters](#). We recognise this will not all be applicable for all aspects of the project but will provide a guide for assessments

concerning England and any modelling / methodology for English sites.

Natural England notes that within EIA Scoping and HRA Screening Reports, the use of the precautionary principle needs to be applied to provide a robust assessment. We advise this precautionary principle has not been applied sufficiently to the Assessment of Significance of Effects matrix (Table 6.2) in the applicant's EIA Scoping Report. Whilst we recognise there is not an agreed standard for significance matrices, the Assessment of Significance of Effect Matrix used in the Stromar EIA Scoping report is less precautionary than the equivalent matrices used in other EIA scoping reports (e.g. MarramWind, GreenVolt, Cambois Connection, Dogger Bank D). We advise that the use of a more precautionary matrix would lead to a more robust assessment.

We understand if a more precautionary matrix is used, other impacts may be scoped in.

Within the cumulative impacts assessment in each chapter, we advise that for any English designated sites screened in, English development projects also need to be screened in for cumulative impacts on these sites.

**EIA scoping report Chapter 10 (Fish and Shellfish Ecology)**  
**EIA Scoping report Chapter 11 (Offshore Ornithology)**  
**Fish, shellfish and ornithology sections within the HRA Screening Report**

Natural England considers that all matters in which we have an interest in English waters have been adequately considered in the EIA. We have no further comments on Fish and Shellfish ecology and Offshore Ornithology.

**12 (Marine Mammals) in the Scoping Report and the relevant sections to these within the HRA Screening Report**

For the marine mammals chapters, we note that the Southern North Sea Special Area of Conservation (SAC) has not been screened into the assessment. Even though we don't anticipate any adverse impacts to the site and note the 200km buffer placed for screening in marine mammal designated sites, we advise this designated site is screened in as the development and the site are both within the North Sea Management Unit.

We also note some impacts within the Scoping Report have been scoped out, one of these being 'Noise-related impacts associated with construction and decommissioning activities resulting in temporary auditory injury (i.e., temporary threshold shifts (TTS)). We advise this is scoped in as this is a main factor in assessing impacts to marine mammals for English designated sites.

Additional Information

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact me using the details below. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Kirstin Bylholt  
Marine Lead Adviser  
E-mail: [kirstin.bylholt@naturalengland.org.uk](mailto:kirstin.bylholt@naturalengland.org.uk)  
Telephone: 020 7714 1488

# Natural Resources Wales

**From:** [Rowlands, Delyth](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** RE: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024  
**Date:** 01 February 2024 13:43:07  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

Good afternoon,

Many thanks for your consultation below. Just to confirm that Natural Resources Wales (NRW) have undertaken a quick review of the reports submitted and do not have any comments to make from a Welsh perspective.

Kind regards,

Delyth

**Delyth Rowlands**

**Swyddog Cynghori Morol** / Marine Advisory Officer

**Gwasanaeth Morol** / Marine Service

**0300 065 5265**

**Llun i Iau 09:00-14:30** / Monday to Thurs 09:00-14:30

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

**Sent:** 18 January 2024 09:47

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

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Ben.Walker@gov.scot](mailto:Ben.Walker@gov.scot)

**Subject:** SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

**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,

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**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

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(collectively referred to as the "EIA Regulations").

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In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Stromar Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

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The HRA Screening Report can be found at: [HRA Screening Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **19 February 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a “nil return” response. Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Yours faithfully,

Iain

**Iain MacDonald**

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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NatureScot



Iain MacDonald  
Marine Licensing & Consenting Casework Officer  
Marine Directorate - Licensing Operations Team  
Scottish Government - Marine Laboratory  
Aberdeen  
AB11 9DB

19 February 2024

Our ref: CNS / REN / OSWF / NE3 –  
Stromar – Pre-application

By email only: [ms.marinerenewables@gov.scot](mailto:ms.marinerenewables@gov.scot)

Dear Iain,

### **Stromar Offshore Wind Farm – ScotWind NE3**

#### **NatureScot advice on the Environmental Impact Assessment (EIA) Scoping Report and Habitats Regulations Appraisal (HRA) Screening Report**

Thank you for consulting NatureScot on the EIA Scoping Report and HRA Screening Report for the Stromar Offshore Wind Farm Array and Export Cable Corridor (ECC).

Our advice on the natural heritage interests to be addressed within the Environmental Impact Assessment Report (EIA Report) and the Report to Inform Appropriate Assessment (RIAA) is outlined below.

#### **Policy context**

We are currently facing two crises, that of climate change and biodiversity loss and as the Scottish Government's adviser on nature, our work seeks to inspire, enthuse and influence others to manage our natural resources sustainably. We recognise that this proposal is a lease awarded through the ScotWind process in an area identified through the Sectoral Marine Plan process for Offshore Wind.

#### **Proposal**

The proposal uses a project design envelope approach<sup>1</sup> and comprises of:

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<sup>1</sup> <https://www.gov.scot/publications/guidance-applicants-using-design-envelope-applications-under-section-36-electricity-act-1989/>

- Up to 71 wind turbine generators (WTGs) with a generating capacity of up to 30 MW.
- Floating foundation types being considered include spar, tension-leg platform, semi-submersible or barge.
- Fixed bottom foundations are also being considered, which include suction buckets, driven piles, drilled piles, anchored tensioned wires or gravity base structures.
- For floating foundations, the mooring systems being considered include taut, catenary, semi-taut or tension.
- For floating foundations, the anchoring systems being considered include drag-embedment, vertical load, pile (including drilled micro-piles), suction or gravity.
- A maximum blade tip height of 385m (Highest Astronomical Tide, HAT) and a minimum blade tip clearance of at least 30m (HAT).
- Up to three Offshore Substation Structures (OSSs) with either fixed (e.g. monopile, monopod suction caisson, suction caisson jacket, piled jacket and gravity-based structure) or floating (e.g. semi-submersible, tension leg platform, barge and spar buoy) foundations.
- Up to one Offshore Reactive Compensation Station (RCS) with fixed foundations, located approximately halfway between the array area and the grid connection point – required if High Voltage Alternating Current (HVAC) technology selected.
- Up to one Offshore Accommodation Platform to provide on-site facilities within the array area.
- Up to one Offshore Innovation Platform within the array area, for conversion of electricity to other fuels.
- Inter-array cabling total length of 720km. Dynamic inter-array cabling will be used if floating foundations are selected, with target burial depth of 4m.
- Up to five interlink cables, with a maximum length of 20km.
- Up to three export cables with a corridor length of 126km and 3km wide.
- Ancillary elements such as buoyancy modules, bend stiffeners, tethering systems, scour and cable protection.
- A grid connection point at New Deer 2, with landfall between Rosehearty and Fraserburgh.
- Direct burial or trenchless (e.g. Horizontal Directional Drilling, HDD) of up to three separate cables, 50m HDD exit offshore pit length and 10m HDD exit offshore pit width, transition joint bay working area length and width of 40m.

### **Content of the EIA Scoping Report and HRA Screening Report**

We are generally content with the format of the EIA Scoping Report and HRA Screening Report, which are well laid out, easy to navigate and read. However, there is little new information on the proposal since the Scoping Workshop in November 2023 and our post-workshop advice (issued 20<sup>th</sup> December 2023) has not been incorporated. We are disappointed that the proposed design envelope remains very broad, with little refinement of project components, resulting in a substantial EIA Scoping Report, but more importantly could result in an extremely large EIA Report to ensure that the worst-case and realistic worst-case scenarios within and across receptors is assessed.

### **Assessment approach**

The EIA Report should consider the impact of all phases of the proposed development on the receiving environment, including effects from pre-construction activities as well as the

construction, operation and maintenance and decommissioning phases. We recommend that the following aspects are considered further and included in the EIA Report.

#### *Ecosystem assessment*

Increasingly, there is a need to understand potential impacts holistically at a wider ecosystem scale in addition to the standard set of discrete individual receptor assessments. This assessment should focus on potential impacts across predator prey interactions. This will enable a better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance from the development of the wind farm on bird and mammal (and other top predator) interests and what influence this may have on population level impacts.

#### *Climate change and carbon costs*

The impact of climate change effects should be considered, both in futureproofing the project design and how certain climate stressors may work in combination with potential effects from the proposed wind farm. The EIA Report should also consider the carbon cost of the wind farm (including supply chain) and to what extent this is offset through the production of green energy. We recognise that some aspects of this are addressed in Section 19 (Greenhouse Gas and Climate Change).

#### *Blue carbon*

In addition to the climate change assessments outlined in Section 19 of the EIA Scoping Report, we recommend that consideration is given to impacts on blue carbon and whether or not an assessment can be undertaken. This should expand on the information and assessment conducted for benthic ecology to focus on the potential impacts of the proposed development on marine sediments and coastal habitats. We recognise that some aspects of this are addressed in Section 8 (Marine Water and Sediment Quality).

#### *Cumulative impact assessment*

We are concerned with the likelihood of multiple offshore export cables making landfall in the area around Fraserburgh/Peterhead and the potential for cumulative impacts arising from construction and associated geophysical, geotechnical and environmental survey programmes. Therefore, we recommend that this is considered further. We have also raised the need for strategic consideration by both Scottish Government (Offshore Wind and Marine Directorates) and the Electricity System Operator (ESO).

#### *Wet storage*

Section 3.7.10 refers to the potential for wet storage of substructures prior to and during integration with the WTGs. Specific requirements and potential wet storage locations are not detailed within the Scoping Report.

Wet storage could represent a significant impact. Consideration of the potential impacts on all receptors needs to be addressed, however we are aware that Marine Directorate are currently considering consenting routes and processes around the activities associated with both the construction and maintenance phases and requirements to assemble, maintain and store components away from the array area. We would welcome further discussion on this as and when further details are available.

## **Proportionate EIA Approach**

We have reviewed the Proportionate EIA Position Paper (08550858 Rev A 3<sup>rd</sup> January 2024), which does not differ from the version we previously reviewed and provided advice on (08410243 Rev A 20<sup>th</sup> October 2023). Our previous advice (issued 20<sup>th</sup> December 2023) remains valid and we reiterate one point in particular:

- We advise a large part of having a proportionate EIA Report is to ensure through use of the Scottish Government guidance on design envelopes, that the project components are refined sufficiently to aid assessment and not result in overly complex scenarios requiring multiple assessments to identify the worst-case scenarios between and across receptors.

## **Environmental Impact Assessment Report (EIA Report)**

The EIA Report provides the assessment to support the application and should be suitability structured, with appropriate formatting, sufficient information with limited repetition to ensure it can be reviewed efficiently and effectively. Consideration should therefore be given to the following aspects:

- It should clearly follow the direction provided in the Scoping Opinion, or where specific agreement was later reached during the pre-application process. Any divergence from this needs to be laid out separately and must be fully justified.
- Consideration should be given to the volume and flow of information within and across each receptor chapter and associated technical appendices. The flow of information relating to impact pathway, assessment and conclusions should be concise, but not omit key information on steps taken. Repeated duplication of text should be avoided through appropriate structuring.
- In electronic versions of the EIA Report, navigational aids including use of hyperlinks etc. are required, particularly where there are supporting technical appendices to any chapters.
- Each stage of the assessment process should be sufficiently transparent to allow the assessments to be repeated. Where specific tools have been used, details of which version and when the assessment was carried out is required.

## **Habitats Regulations Appraisal (HRA)**

We welcome the submission of the EIA Scoping Report and HRA Screening Report in a single package, and the opportunity to combine our advice under each assessment process into a single response. We provide HRA advice for marine ornithology, marine mammals, benthic subtidal ecology, and diadromous fish in each of the relevant appendices below.

## **Positive Effects for Biodiversity / Biodiversity Net Gain**

We recommend early consideration of potential Positive Effects for Biodiversity as well as nature inclusive design aspects at an early stage and following through into the EIA Report. We acknowledge that, whilst not policy in the marine environment, these aspects form part of our ability to address both the climate and biodiversity crises and as such we encourage developers to consider this as part of their application.

## **Mitigation**

We welcome the identification of “embedded commitments” described in each of the relevant sections of the EIA Scoping Report (for example Section 8.4) and summarised in Appendix A (Offshore Commitments Register).

However, much of the embedded mitigation detailed throughout includes the development and adherence to post-consent plans/programmes. Plans do not strictly constitute mitigation – it is the measures contained within the plan that will mitigate impacts. The EIA Report must clearly articulate those mitigation measures that are informed by the EIA (or HRA) and are necessary to avoid or reduce predicted significant adverse environmental effects of the proposed development. We advise that the full range of mitigation and monitoring measures, and published guidance, are considered and discussed in the EIA Report.

### **Natural Heritage interests to be considered**

We provide advice as detailed below within receptor-specific technical appendices for key natural heritage interests to be considered in the EIA Report:

- Advice on physical processes (including marine and coastal processes) is provided in **Appendix A**.
- Advice on benthic ecology is provided in **Appendix B**.
- Advice on fish and shellfish ecology is provided in **Appendix C**. (Noting that for diadromous fish we have limited our advice to the requirements for these to be considered as part of the EIA Report only – further advice is contained within the appendix).
- Advice on marine ornithology is provided in **Appendix D**.
- Advice on marine mammals is provided in **Appendix E**.

For the following receptor, we advise:

- Seascape, Landscape Character and Visual Impact assessment (SLVIA) – we advise that this topic can be scoped out. This is due to the distance of the array from shore and the small scale nature of the Offshore Reactive Compensation Station (RCS). The SLVIA visualisations presented in Appendix E were useful and we welcome that these were provided to inform our advice at this stage.

### **Further information and advice**

We hope this advice is of assistance to help inform the Scoping Opinion, noting that there may be aspects where some further engagement is required to assist in preparing the EIA Report and RIAA.

Please contact me in the first instance for any further advice, using the contact details below, copying to our marine energy mailbox – [marineenergy@nature.scot](mailto:marineenergy@nature.scot).

Yours sincerely,

**Caitlin Cunningham**

Marine Sustainability Adviser – Sustainable Coasts and Seas

[caitlin.cunningham@nature.scot](mailto:caitlin.cunningham@nature.scot)

## **NatureScot advice on EIA Scoping Report for the Stromar Offshore Wind Farm**

### **Appendix A – Physical Processes**

Physical processes are considered in section 7 (marine and coastal processes) of the EIA Scoping Report.

Section 7.9 of the Scoping Report includes some direct requests for consultee feedback, we have responded to these within our advice below.

#### **Study area**

The study area is vaguely defined (including in Figure 7.1) and “will be further refined during EIA with consideration to the tidal excursions”. We recommend that the study area extends to at least one tidal excursion outwith the array area and export cable corridor. We ask that we are consulted further if the study area differs from this.

#### **Baseline characterisation**

We are content with the key data sources as listed in table 7.1.

#### **Impact pathways**

We consider it is appropriate for modifications to littoral transport and coastal behaviour to be scoped in. However, in table 7.4 there is reference to the “Fraserburgh to Rosehearty SSSI” for this impact, which should instead read Rosehearty to Fraserburgh Coast SSSI.

Should landfall be by direct burial and/or by HDD that exits within the intertidal zone, there could be significant adverse impacts on the geological interest of the SSSI. This should be explicitly scoped in as a potential construction-phase impact, ideally separate from “Potential impacts to seabed morphology”. Expert geo-conservation judgement will be a key part of the assessment method. Please note that it is doubtful that micro-siting landfalls through parts of the SSSI where sediment or soil currently covers bedrock would avoid significant adverse impacts.

We are content for potential impacts to seabed morphology to be scoped in, including impacts to the Southern Trench nature conservation Marine Protected Area (ncMPA). We highlight that the assessment should formally use the relevant ncMPA Conservation Objectives with regard to each feature separately (but also taking account of relevant functional links between them), and involve expert geomorphological assessment.

In addition to seabed scouring being scoped in for the potential settings mentioned, the assessment should also consider potential secondary scour from scour protection itself.

We recommend that modifications to the wave and tidal regime is scoped in rather than out. Currently, the Scoping Report considers only physical receptors, but there could be effects on receptors under other receptor topics. Moreover, the justification also argues that assessments of these effects for other offshore wind farms in the region concluded no significant impacts, but further detail of the relevance of this comparison is something that should be explored through EIA assessment. This might be a sufficient methodology (possibly in combination with desk-based use of empirical formulae) for assessing this potential impact, but please see also our comments below regarding proposed modelling.

The potential re-exposure of a trenched cable(s) at landfall should be assessed as an additional operational impact, especially given the anticipated increases in rates and extent of erosional

retreat at the coast due to accelerating sea-level rise. This is to reduce any potential need for future hard engineering, which could in turn disrupt coastal processes. As other landfalls are currently proposed in the same general area, it may also be relevant to the cumulative impact assessment considerations.

### **Approach to assessment**

Definitions of Magnitude and Sensitivity for the Marine and Coastal Processes impact assessment should be provided at this Scoping stage rather than waiting till in the EIA Report. This is important to avoid potential disagreement over assessment undertaken.

Numerical modelling is proposed in paragraphs 7.5.5 and 7.6.2 (and 9.6.4) to inform relevant tidal excursions, but paragraphs 7.8.8 and 8.8.8 imply that the modelling will also inform the assessment. We welcome the proposal to consult further regarding modelling. We highlight that to be effective, this should be done well before the detailed assessment is undertaken, and it should clarify the intended use of the modelling in the EIA.

### **Cumulative assessment**

At this Scoping stage, we would expect to see a list of impacts to be scoped in/out for consideration. However, this has not been presented. We would welcome further consultation on the cumulative assessment approach, including impacts to be scoped in/out.

We are concerned with the likelihood of multiple offshore export cables making landfall in the Fraserburgh/Peterhead area and the potential for cumulative impacts arising from construction and associated geophysical, geotechnical and environmental survey programmes. Therefore, we recommend that this is considered further. We have also raised the need for strategic consideration by both Scottish Government (Offshore Wind and Marine Directorates) and the Electricity System Operator (ESO).

### **Mitigation and monitoring**

We welcome the identification of “embedded commitments” described in Section 7.4 and summarised in Appendix A (Offshore Commitments Register). As noted elsewhere in this advice, the list of embedded mitigation measures in this EIA Scoping Report is currently minimal.

### **Transboundary impacts**

We agree that transboundary impacts can be scoped out from further consideration.



## **NatureScot advice on EIA Scoping Report for the Stromar Offshore Wind Farm**

### **Appendix B – Benthic Ecology**

Benthic ecology interests are considered in section 9 of the EIA Scoping Report and sections 4.2, 5.2 and 6.2 of the HRA Screening Report.

Section 9.9 of the Scoping Report includes some direct requests for consultee feedback, we have responded to these within our advice below. In addition, our advice with respect to the HRA Screening Report is also provided below.

#### **Study area**

The study area is proposed as a 6km buffer around the array area and ECC. However, we note that this may be amended if modelling of the tidal excursion indicates a greater Zone of Influence. We are content with this approach.

#### **Baseline characterisation**

We are content with the proposed data sources and guidance documents, as per section 9.3.

It is unclear from section 9.3 which receptors will be considered in the EIA Report, although various receptors are mentioned in this section. We advise that the following benthic and intertidal features should be considered:

- Annex 1 habitats
- Priority Marine Features (PMFs)
- Protected species
- Protected prey species
- Features of protected sites

If it is identified that there is a likelihood of the array area or ECC interfering with either Annex 1 habitats or PMFs, we would welcome further consultation at the earliest opportunity.

#### **Potential impacts**

In our previous advice (issued 20<sup>th</sup> December 2023) following the Scoping Workshop, we advised that EMF impacts should be scoped in. The EIA Report should include EMF modelling, with comparisons to environmental/background levels of EMF and considering any EMF attenuation. Modelling results should then be compared to the existing evidence-base to produce a narrative on which species may be most sensitive to potential EMF impacts.

However, despite this being “Scoped In” in table 9.4, the Proportionate EIA column states that “No LSE identified at Scoping”. Furthermore, Appendix B Offshore Impacts Register also states that EMF effects are scoped out. Our advice remains that EMF impacts should be scoped in and any discrepancies across the sections/appendices should be resolved.

We are content with all other impacts as described in the Offshore Impacts Register.

#### **Approach to assessment**

We are content with the approach to assessment for benthic ecology. Noting, however, our general comments on the Proportionate EIA Approach in our cover letter.



**Cumulative impacts**

With the proposed number of offshore wind developments in Scottish waters, we are noting the tendency for developers to indicate no LSE from EMF impacts from a cumulative basis. However, we are concerned that the spatial and temporal scale is not being considered cumulatively across the network of cables, including those outwith of the proposed development. Thus, we advise that EMF impacts are considered in the cumulative assessment.

**Transboundary impacts**

We agree that transboundary impacts can be scoped out for benthic ecology interests.

**Mitigation and monitoring**

We welcome the identification of “embedded commitments” described in Section 9.4 and summarised in Appendix A (Offshore Commitments Register). As noted elsewhere in this advice, the list of embedded mitigation measures in this EIA Scoping Report is minimal.

**Habitats Regulations Appraisal (HRA) Screening Report**

We agree with the conclusion in the HRA Screening Report that no sites with Annex 1 habitat features need to be taken forward to assessment.

## NatureScot advice on EIA Scoping Report for the Stromar Offshore Wind Farm

### Appendix C – Fish and Shellfish Ecology

Fish and shellfish interests are considered in section 10 of the EIA Scoping Report and sections 4.5, 5.5 and 6.5 of the HRA Screening Report.

Section 10.9 of the Scoping Report includes some direct requests for consultee feedback, we have responded to these within our advice below. In addition, our advice with respect to the HRA Stage 1 Screening Report is also provided below.

#### Study area

The study area has been defined from the risk of underwater noise impacts (50km around the array area) and the Zone of Influence associated with potential secondary impacts related to suspended sediment concentrations (6km around the array and ECC). However, we note that the latter may be amended if sediment plume modelling indicates a greater Zone of Influence. We are content with this approach.

#### Baseline characterisation

We are content with the proposed data sources and guidance documents, as per section 10.3, including the use of site-specific benthic surveys and eDNA data to inform the baseline.

We advise the following additional publications (and relevant data layers) to characterise fish spawning grounds:

- Langton R., Boulcott P., Wright P.J. (2021) A verified distribution model for the lesser sandeel *Ammodytes marinus*. Mar. Ecol. Prog. Ser. 667: 145-159.
- González-Irusta J.M. and Wright P.J., 2016. Spawning grounds of Atlantic cod (*Gadus morhua*) in the North Sea. ICES Journal of Marine Science, 73(2), pp.304-315<sup>2</sup>.
- González-Irusta J.M. and Wright P.J., 2017. Spawning grounds of whiting (*Merlangius merlangus*). Fisheries Research, 195, pp.141-151<sup>3</sup>.
- González-Irusta J.M. and Wright P.J., 2016. Spawning grounds of haddock (*Melanogrammus aeglefinus*) in the North Sea and West of Scotland. Fisheries Research, 183, pp.180-191<sup>4</sup>.

We are content that all receptors related to fish and shellfish ecology have been identified. This includes the list of protected or threatened/declining fish in table 10.3, maps of spawning/nursery grounds for commercial fish species, and the discussion around the fish and shellfish species found at other offshore wind farms in the Moray Firth.

#### Potential impacts

We are content with the impacts scoped in/out as per table 10.6 and section 5 of Appendix B Offshore Impacts Register, with the following advice.

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<sup>2</sup> González-Irusta J.M. and Wright P.J., 2016. Cod – spawning grounds – North Sea <https://marine.gov.scot/maps/1912>

<sup>3</sup> González-Irusta J.M. and Wright P.J., 2017. Whiting – spawning grounds – North Sea <https://marine.gov.scot/maps/1914>

<sup>4</sup> González-Irusta J.M. and Wright P.J., 2016. Haddock – spawning grounds – North Sea <https://marine.gov.scot/maps/1911>

Underwater noise should also be considered during the operational phase, as there is some evidence showing that the movement of the mooring and anchoring cables can be noisy. Results from the Hywind and Kincardine demonstrator sites<sup>5</sup> should be included in the desk-based study.

In section 5 of Appendix B Offshore Impacts Register, the impact with ID I-C-45 “Approach to Assessment” text is not fully visible. From what can be seen, sandeel is omitted. Given sandeel have a very specific habitat preference and live as adults within the sediment, they would be impacted by permanent and/or long-term habitat loss/alteration. Within the EIA Report, we would expect to have an indication of the extent of this habitat type within the development site and extent of associated long-term habitat loss/alteration.

### **Approach to assessment**

We are generally content with the approach to assessment for fish and shellfish ecology, with further comments below. Noting, however, our general comments on the Proportionate EIA Approach in our cover letter.

We note that the baseline will be further informed by site specific drop-down video, benthic grabs and eDNA sampling. To make the most of eDNA sampling, we recommend that this should be taken seasonally to capture all the fish that migrate through the development site.

We note that underwater noise modelling will be based on the impact thresholds reported in Popper et al (2014). This will be conducted for fish and shellfish as both stationary and fleeing receptors. If herring spawning grounds or sandeel habitat are identified nearby, we recommend that underwater noise modelling should include eggs and larvae.

The EIA Report should clearly set out impacts to key prey species (such as sandeel, herring, mackerel and sprat) and their habitats arising from the development alone and cumulatively with other wind farms. Increasingly we need to understand impacts at the ecosystem scale. Therefore, consideration across key trophic levels will enable better understanding of the consequences (positive or negative) of any potential changes in prey distribution and abundance on marine mammal (and other top predator) interests and how this may influence population level impacts. Consideration of how this loss and or disturbance may affect the recruitment of key prey (fish) species through impacts to important spawning or nursery ground habitats should also be assessed. The PrePARED (Predators and Prey Around Renewable Energy Developments) project<sup>6</sup> may be helpful in the understanding of predator-prey relationships in and around offshore wind farms.

### **Cumulative impacts**

We are content with increased suspended sediment concentrations and underwater noise being considered for cumulative impacts.

With the proposed number of offshore wind developments in Scottish waters, we are noting the tendency for developers to indicate no LSE from EMF impacts from a cumulative basis. However, we are concerned that the spatial and temporal scale is not being considered cumulatively across

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<sup>5</sup> Risch D., Favill G., Marmo B., van Geel N., Benjamins S., Thompson P., Wittich A., and Wilson B. 2023. Characterisation of underwater operational noise of two types of floating offshore wind turbines. Scottish Association for Marine Science, Xi Engineering Consultants, University of Aberdeen.

<sup>6</sup> <https://owecprepared.org/>

the network of cables, including those outwith of the proposed development. Thus, we advise that EMF impacts are considered in the cumulative assessment.

### **Transboundary impacts**

We agree that transboundary impacts can be scoped out for fish and shellfish interests.

### **Mitigation and monitoring**

We welcome the identification of “embedded commitments” described in Section 10.4 and summarised in Appendix A (Offshore Commitments Register). As noted elsewhere in this advice, the list of embedded mitigation measures in this EIA Scoping Report is minimal.

For migratory fish – we advise the need for ongoing consideration of mitigation as the proposal develops. This should include but not be limited to:

- Timing of construction periods in respect of migratory periods, particularly for the export cable landfall and coastal corridor
- Consideration of underwater noise effects during both construction and operation

## **Habitats Regulations Appraisal (HRA) Screening Report**

### *Migratory Fish*

We note that for diadromous fish species there is limited knowledge of distribution and behaviour of these species in the marine environment. For example, the precise migration routes of adult or juvenile Atlantic salmon or direction taken by migrating adult European eels is not fully known. Published information indicates that European smelt and River lamprey are primarily, though probably not exclusively, associated with estuarine environments. Shad might also prefer estuarine environments.

The recently updated ScotMER evidence map<sup>7</sup> process for diadromous fish confirms these evidence gaps, particularly with respect to spatial and temporal distribution as well as uncertainty around migration routes and connectivity to protected sites. The ScotMER process is an important vehicle for helping to address these evidence gaps and uncertainties. We specifically welcome the ScotMER project *Diadromous Fish in the Context of Offshore Wind – Review of Current Knowledge & Future Research*, due to be published soon.

This research may change conclusions on how diadromous fish are treated in both EIA and HRA going forward. However, we advise, based on evidence currently available to us, it is not possible for us to carry out an assessment of diadromous fish to the level required under HRA. We therefore advise that diadromous fish species should be assessed through EIA only and not through HRA.

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<sup>7</sup> <https://www.gov.scot/publications/diadromous-fish-specialist-receptor-group/> – published 26 January 2023

## NatureScot advice on EIA Scoping Report for the Stromar Offshore Wind Farm

### Appendix D – Marine Ornithology

Ornithology interests are considered in section 11 of the EIA Scoping Report and sections 4.4, 5.4 and 6.4 of the HRA Screening Report.

Section 11.9 of the Scoping Report includes some direct requests for consultee feedback, we have responded to these within our advice below. In addition, our advice with respect to the HRA Screening Report is also provided below.

#### Study area

The developers are assessing a proposed 4km buffer around the array area and ECC, which we previously agreed to (advice issued 04/03/2022). We are content with this approach but highlight that edge effects may occur when modelling marine bird distribution across the site.

#### Baseline characterisation

##### *Data sources*

We are content with the proposed data sources and guidance documents, as per section 11.3. We note that table 11.1 is not exhaustive and we highlight that Seabirds Count<sup>8</sup> should be considered alongside the Sectoral Marine Plan.

##### *Digital Aerial Surveys (DAS)*

It is useful to see the raw count data from the first year of DAS in table 11.2. However, we advise that no species are scoped out based on a single year of data. All survey work must be completed before concluding which species are taken forward for assessment. It should also be noted that we would not expect nocturnally active species to be excluded based on the findings of DAS, we recommend other data sources are used before screening these species out.

We have also reviewed Appendix D Year 1 DAS Report (08550861 Rev A dated 3<sup>rd</sup> January 2024) and note that this version remains unchanged from what we previously reviewed (HP00182-701-02 v2 dated 14<sup>th</sup> September 2023). Moreover, our previous advice (issued 20<sup>th</sup> December 2023) and requests for clarification have not been addressed. We were unclear why any proportion of dead birds had been included in the analyses and noted that the approach to apportioning of unidentified birds to species level was not described in the results. We requested clarification and clear justification on these points in particular.

#### Potential impacts

We are content with the impacts scoped in/out as per table 11.8 and section 6 of Appendix B Offshore Impacts Register, with the following advice.

Indirect impacts to prey species through temporary habitat loss should also be scoped in, not just through underwater noise or increased suspended sediment concentrations. It is important that the link between habitat loss/change/disturbance and changes in prey availability is made clear, as well as the expected impact on ornithological interests, and not just considered as a temporary effect. We suggest that “changes in prey availability” may be more appropriate as a heading.

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<sup>8</sup> <https://jncc.gov.uk/our-work/seabirds-count/>

We understand that barrier effects will be considered within the displacement assessment as distributional responses. We are content with this approach.

We note that collision risk for wet storage is scoped in for construction and decommissioning. If there is a requirement for wet storage during the operations and maintenance phase, then this should also be scoped in. We are aware that Marine Directorate are currently considering consenting routes and processes around wet storage. We would welcome further discussion on this as and when further details are available, particularly as it might not be appropriate for this to be considered as part of this application process.

## **Approach to assessment**

### *Seasonality*

Table 11.5 indicates the proposed species-specific breeding and non-breeding seasons to be taken through to the assessment. We are content that this aligns with the NatureScot Guidance Note 9<sup>9</sup>, other than for black-legged kittiwake, which should be mid-April to August for the breeding season.

### *Abundance data*

In paragraph 11.8.4, we note that a design-based modelling approach will be used to calculate abundance and density estimates as the default method. We advise that model-based methods should instead be the default for an assessment, as per NatureScot Guidance Note 2<sup>10</sup>.

### *Collision risk*

It is unclear how seabirds will be treated when undertaking collision risk modelling from the wording used within table 11.8 and section 6 of Appendix B Offshore Impacts Register. Seabird species should be assessed all year round where they are present, for example breeding and non-breeding for gulls and only breeding for terns. See NatureScot Guidance Note 7<sup>11</sup> for further advice.

We agree that generic flight heights should be used within the collision risk modelling, as per paragraph 11.8.5.

In paragraph 11.8.12, the applicant notes an intention to follow the NatureScot Guidance Note 7 when conducting their collision risk assessment. We support this and the intention to use the sCRM tool. We advise that we no longer require Option 3 models to be run, only Option 2. We will be updating our guidance shortly to reflect this change in our advice. However, we do still expect deterministic outputs for each collision risk species as well as stochastic outputs for Option 2.

Migratory birds should be dealt with separately. There is ongoing work around migratory species including the recently published ScotMER *Strategic review of birds on migration in Scottish*

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<sup>9</sup> [Guidance Note 9: Guidance to support Offshore Wind Applications: Marine Ornithology – Advice for seasonal definitions for birds in the Scottish marine environment.](#)

<sup>10</sup> [Guidance Note 2: Guidance to support Offshore Wind Applications: Advice for Marine Ornithology Baseline Characterisation Surveys and Reporting.](#)

<sup>11</sup> [Guidance Note 7: Guidance to support Offshore Wind Applications: Marine Ornithology - Advice for assessing collision risk of marine birds.](#)

*waters*<sup>12</sup> and this should be used alongside the mCRM if available within the timelines of this project.

### *Displacement*

The applicant notes an intention to use SeabORD for relevant species and we support this. We also note the issues raised in paragraph 11.8.18, however, our position remains that SeabORD is more biologically representative of the impacts of distributional responses than the matrix approach. Marine Directorate are currently reviewing this tool, and we will update our position once their review is complete.

Regarding the Beatrice post-construction monitoring report in terms of displacement and inclusion in the cumulative assessment, this was discussed at the Scoping Workshop. We intend to review the Beatrice post-construction monitoring report once published (it is currently undergoing peer-review) alongside other offshore windfarm literature and if appropriate, we will update the displacement rates in our guidance.

### *Population Viability Assessment (PVA)*

There is currently work ongoing to update demographic rates for PVA, once this has been published, we will update our guidance notes accordingly and would expect this to be incorporated into the assessment.

For great black-backed gull, the recommendation in Horswill and Robinson is that juvenile and immature survival rates are taken from other large gulls. We accept the use of herring gull juvenile survival rate for juvenile great black-backed gull as recommended in Horswill and Robinson. As no immature survival value is available in Horswill and Robinson, we will accept the use of juvenile herring gull and adult great black-backed gull to calculate an 'average' survival for the immature age class.

## **Cumulative impacts**

Paragraph 11.6.2 lists projects to be included in the cumulative assessment. This list does not include all sites we would expect to be considered when undertaking the cumulative assessment and advice should be sought from Marine Directorate regarding the industries and activities to be included.

During the Scoping Workshop, we agreed that construction and decommissioning impacts could be scoped out of the cumulative assessment. However, we advised that some cumulative assessment may need to be made on impacts of vessel disturbance if construction and decommissioning vessels are likely to be going through a marine SPA e.g. Moray Firth SPA. This is because several developments could be building out at the same time or otherwise overlap. We raise this because it is possible that ports and harbours in the Moray Firth might be selected and this would therefore need adequate consideration within the cumulative assessment.

We advise that if the Cumulative Effects Framework (CEF) is published within the project timeframe then it should be used to undertake the cumulative assessment and if not published,

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<sup>12</sup> [Strategic study of collision risk for birds on migration and further development of the stochastic collision risk modelling tool. Work Package 1: Strategic review of birds on migration in Scottish waters.](#)

the approach commissioned by the North East and East Offshore Wind Developer Group should be utilised.

In addition, we have advised Marine Directorate that the Berwick Bank application will have adverse effects on site integrity (AeoSI) on multiple seabird species within The UK European Site Network, some of which overlap with the species and sites assessed in other applications. Consequently, as the outcome of the Berwick Bank application is unknown at present, PVA models should be run using two scenarios: Berwick Bank consented and unconsented.

### **Transboundary impacts**

Potential transboundary impacts are briefly described in EIA Scoping Report section 11.7. For the project-alone assessment, we are content for transboundary impacts during the breeding season to be scoped out. However, we would expect these to be considered within the cumulative assessment. We note that no specific approach to this assessment is set out and so we cannot provide further advice at this stage.

Additionally, we note that section 11.7 does not specifically account for migratory species but we recognise that a migratory bird assessment/review will be undertaken.

### **Mitigation and monitoring**

We welcome the identification of “embedded commitments” summarised in Appendix A (Offshore Commitments Register). As noted elsewhere in this advice, the list of embedded mitigation measures in this EIA Scoping Report is minimal.

There is scope for additional embedded mitigation measures to be specified, for example:

- With respect to nocturnal species impacts of lighting could be an issue. Species such as European storm petrel, Leach’s storm-petrel and Manx shearwater may be attracted to and/or disorientated by artificial light sources. We noted the presence of 14 European storm petrels in June and 11 Manx shearwaters in July 2022 based on the DAS raw counts.
- As well as lighting on turbines and other structures, this includes lighting on servicing or construction vessels, particularly if construction will be a 24/7 operation. Such effects could impact assessment of collision and/or displacement. We recommend considering the findings from the Marine Directorate commissioned review to inform the assessment of the risk of collision and displacement in petrels and shearwaters from offshore wind developments in Scotland<sup>13</sup>.
- In addition, we recommend that protocols are built into construction and operation phases for monitoring and handling of any birds attracted by lighting, as well as associated recording of any such incidents including context (e.g. weather).

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<sup>13</sup> <https://www.gov.scot/publications/review-inform-assessment-risk-collision-displacement-petrels-shearwaters-offshore-wind-developments-scotland/documents/>



## Habitats Regulations Appraisal (HRA) Screening Report

### Summary

In general, the information provided in the HRA Screening Report is acceptable and as expected. However, we have some specific comments to make as outlined below.

### Data sources

We note that table 4.3 is not an exhaustive list of data sources, however, we highlight that the Seabirds Count<sup>14</sup> and ScotMER *Strategic review of birds on migration in Scottish waters*<sup>15</sup> should be included.

### Foraging ranges

We support the use of Woodward et al. (2019) for foraging ranges, as per table 5.3. However, we advise using a variation on this for different species depending on the European site they are associated with. This applies to guillemot and razorbill for northern SPAs and gannets associated with three SPAs – further advice is provided in NatureScot Guidance Note 3<sup>16</sup>.

### Impact pathways

The HRA screening takes into consideration key impact pathways. Impacts associated with the wind farm array are summarised in table 5.4.

Collision risk for wet storage is not included in table 5.4, both for construction and decommissioning, nor operation and maintenance. If there is a requirement for wet storage during any phase, then this should also be scoped in – see above for further advice.

Within this table, changes in prey availability are only considered under toxic contamination. However, indirect impacts to prey species through temporary habitat loss should also be scoped in – see above for further advice.

Under attraction to light, a buffer of 15km is proposed. We request justification and clear reasoning for this distance and whether it relates to all lighting or aviation or navigation lighting.

### Likely Significant Effect (LSE)

The approach undertaken in the HRA Screening Report seems broadly appropriate for LSE screening, subject to our advice below. However, we advise that conclusions on Likely Significant Effect (LSE) should **not** be made until all the data from site-specific survey work is available. This is so that a full picture of how birds are interacting with the array footprint is fully understood. We accept this means the initial list will therefore be long in nature.

Paragraph 6.4.36 d) in particular proposes that there is no potential for LSE in the breeding season for a number of species recorded in low numbers or absent from the first year of DAS. As above, conclusions of LSE should **not** be made until all the data from site-specific survey work is available.

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<sup>14</sup> <https://jncc.gov.uk/our-work/seabirds-count/>

<sup>15</sup> [Strategic study of collision risk for birds on migration and further development of the stochastic collision risk modelling tool. Work Package 1: Strategic review of birds on migration in Scottish waters.](#)

<sup>16</sup> [Guidance Note 3: Guidance to support Offshore Wind applications: Marine Ornithology - Identifying theoretical connectivity with Special Protection Areas using breeding season foraging ranges.](#)

Furthermore, we would not expect nocturnally active species to be excluded based on the findings of DAS, we would recommend other data sources are used before screening these species out.

### **Pathways for LSE**

Pathways for LSE are discussed in paragraphs 6.4.2-6.4.4 – see above for further advice regarding which impacts should be included.

### **Breeding seabirds in the non-breeding season**

Connectivity has been identified for breeding seabirds in the non-breeding season using the areas associated with the BDMPS for each species. To determine LSE, two factors were considered:

- the abundance of each species as recorded during baseline aerial surveys
- the contribution of each SPA to the total BDMPS population

Paragraph 6.4.11 states that “as only one year of baseline data is currently available, this aspect of the screening exercise will be revisited in the RIAA once the full two-year baseline dataset is available”. We are content with this approach as the abundance of each species cannot be ascertained based on incomplete survey data.

We are unclear what table 6.4 is presenting, there are species included that are not seen in the non-breeding season and it is not a full list of the species recording during the DAS.

Paragraph 6.4.17 considers that there will be no LSE on SPA populations whereby the contribution calculated in table 6.5 is less than 1%. Reasoning behind this threshold choice is not presented and we request clear justification for the use of this.

### **Migratory waterbirds**

We reviewed the Clarification Note: HRA Screening for Migratory Waterbirds and Seabirds and submitted advice on this on 20<sup>th</sup> December 2023. Our advice was:

For Stage 1, we disagree with the use of Wright et al. 2012 for the assessment of migratory birds. Instead, the recently published ScotMER *Strategic review of birds on migration in Scottish waters*<sup>17</sup> should be used for assessment of migratory birds. Whilst not all the work packages have been published, our understanding is that they have all been completed and those remaining to be published should become available in time to inform your assessment, including the stochastic collision risk modelling results of migratory species.

Regarding Stage 2, we are concerned about introducing a level of magnitude – this is inappropriate for screening and should be presented within the assessment itself. For the screening, connectivity should be identified and theoretical impact pathways considered to develop the long list. Results from the DAS and consideration of other evidence (e.g. tracking studies) can be used to further refine the list and screen out sites. Where this applies, a clear audit trail should be provided documenting the relevant evidence and a list of SPAs where this has been applied, to allow for transparency of rationale behind any decisions.

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<sup>17</sup> [Strategic study of collision risk for birds on migration and further development of the stochastic collision risk modelling tool. Work Package 1: Strategic review of birds on migration in Scottish waters.](#)

## **LSE matrix**

Table 6.15 and 6.16 are LSE matrices for SPAs in UK waters with marine ornithological features, for the array and ECC respectively. This table is informed by table 6.14 which describes the vulnerability of qualifying species with potential connectivity to pressures.

Further research has been undertaken looking at offshore wind developments and collision and displacement in petrels and shearwaters<sup>18</sup>, which should be incorporated into the assessment in table 6.14.

In table 6.15, we note that the distributional response has been separated into displacement and barrier effects. We state in our guidance that disentangling barrier effects and displacement can be difficult, but possible with tracking data. We also note that barrier effect has not been included for kittiwake.

Table 6.17 describes the potential for LSE and associated pressures. We are unclear why LSE for attraction to light is included for the ECC only for certain species, e.g. storm petrel. We advise that further justification is required.

## **In-combination effects**

We note that in-combination effects have not been included in the LSE matrix (table 6.15 and 6.16) which we would have expected to see. As such, we cannot provide further advice at this stage.

However, we note that paragraph 7.1.2 states that “a de minimis effect should be considered trivial and inconsequential”. We do not agree to the de minimis approach described here.

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<sup>18</sup> Offshore wind developments - collision and displacement in petrels and shearwaters: literature review.

## NatureScot advice on EIA Scoping Report for the Stromar Offshore Wind Farm

### Appendix E – Marine Mammals

Marine mammals are considered in section 12 of the EIA Scoping Report and sections 4.3, 5.3 and 6.3 of the HRA Screening Report.

Section 12.10 of the Scoping Report includes some direct requests for consultee feedback, we have responded to these within our advice below. In addition, our advice with respect to the HRA Screening Report is also provided below.

#### Study area

We are content with the approach to use a regional scale study area encompassing Management Units (MUs) for each species and a local scale study area based on the DAS (4km buffer). We advise that the UK portion of the MU should be used in the EIA Report.

#### Baseline characterisation

##### *Data sources*

We are content with the proposed data sources and guidance documents, as per section 12.3.

We advise the following additional data sources should be included:

- ORCA<sup>19</sup> ferry survey data, particularly the Aberdeen-Kirkwall route
- Reducing Conservatism in Underwater Noise in assessment for Offshore Wind (ReCON)<sup>20</sup>
- National Marine Fisheries Service. 2018. 2018 Revisions to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing<sup>21</sup>

We appreciate that not every species is covered by SCANS IV in terms of density estimates for assessment. We advise that in the absence of SCANS IV data (for example bottlenose dolphin) that SCANS III is used unless DAS were to yield a higher estimate. Our preference is to use DAS or SCANS IV (whichever is most precautionary) and in the absence of these – the most precautionary density estimates should be used from the listed data sources for every species possible.

##### *Receptors*

We welcome the consideration of less common species in the baseline on a qualitative basis, namely humpback whale, orca and Atlantic white-sided dolphin.

We note that the first year of DAS has been considered to inform the baseline of the Scoping Report as well as scientific literature. We would like to highlight that any additional species that are identified from the second year of DAS should also be included in the EIA Report.

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<sup>19</sup> <https://orca.org.uk/>

<sup>20</sup> <https://www.carbontrust.com/our-work-and-impact/guides-reports-and-tools/reducing-uncertainty-in-underwater-noise-assessments-for-offshore-wind-recon>

<sup>21</sup> <https://www.fisheries.noaa.gov/resource/document/technical-guidance-assessing-effects-anthropogenic-sound-marine-mammal-hearing>

We note that basking sharks are being covered in the fish and shellfish chapter and we are content with this approach. We highlight that mitigation should align with marine mammals (JNCC guidelines and Scottish Marine Wildlife Watching Code<sup>22</sup>).

Section 12.4 summarises the receptors scoped in for marine mammals and we are content that these have been identified correctly.

### **Potential impacts**

We are content with the impacts scoped in/out as per table 12.4 and section 7 of Appendix B Offshore Impacts Register, with the following advice.

### **Approach to assessment**

We confirm that the proposed approach to assessment is as expected. This section includes reference to the proposed approach to noise modelling, which will be based on the INSPIRE/SPEAR models. We provide further comments below.

#### *Piling*

With the project design envelope parameters identified in the Scoping Report it is still unknown how many OSS will be required, or the number of piles (if any) required for each WTG (whether floating or fixed foundations). As the project is refined, the applicant should include and assess each foundation type, including the number and type of piles required per floating or fixed foundation, and the number of piles per OSS as a worst-case piling scenario.

At this stage, we highlight our general advice in the cover letter regarding project refinement to aid assessment and not result in overly complex scenarios requiring multiple assessments to identify the worst-case scenarios.

#### *UXO clearance*

We are content with the use of the TTS-onset threshold to be used as a proxy for disturbance from UXO clearance. We recommend that low order deflagration is undertaken if UXO clearance is required.

### **Cumulative impacts**

Potential cumulative impacts are briefly discussed in section 12.7. We recommend the use of the Cumulative Effects Framework if available within the project timeframe, or the most up-to-date version of iPCoD if not.

We are content that a cumulative assessment will be undertaken once more detail is understood of the potential impacts associated with the proposed development in terms of spatial and temporal overlap with other developments in the North Sea. We welcome a strategic and collaborative approach to cumulative impacts with adjacent projects and would appreciate discussion and agreement at a later stage with Marine Directorate and NatureScot as to what projects are included in this assessment.

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<sup>22</sup> <https://www.nature.scot/professional-advice/land-and-sea-management/managing-coasts-and-seas/scottish-marine-wildlife-watching-code>

### **Transboundary impacts**

Potential transboundary impacts are briefly discussed in section 12.8 and we note that the applicant has acknowledged that impacts from the proposed development could have the potential to affect the transboundary integrity of European sites. At this stage we do not consider it a necessity to consider transboundary effects for marine mammals as long as assessment is made against the UK marine mammal management units.

### **Mitigation and monitoring**

We welcome the identification of “embedded commitments” described in Section 12.5 and summarised in Appendix A (Offshore Commitments Register). As noted elsewhere in this advice, the list of embedded mitigation measures in this EIA Scoping Report is minimal – we provide further advice below.

We note that in Appendix A, the offshore infrastructure will be sited to avoid the deepest sections (beyond 200m) of the Southern Trench nature conservation Marine Protected Area (ncMPA). Due to the increasing number of developments in the Moray Firth, we advise the applicant to consider locations outwith the Southern Trench ncMPA for siting the OSS, especially as up to three export cables could be routed through the ncMPA.

We would encourage the applicant to liaise with adjacent developments and Marine Directorate SEDD Scottish Passive Acoustic network (SPAN)<sup>23</sup> for opportunities to contribute to monitoring, research and analysis, particularly as floating wind is an emerging marine development.

### **Habitats Regulations Appraisal (HRA) Screening Report**

We agree that the Moray Firth SAC should be screened in for further assessment, due to the potential connectivity of the coastal bottlenose dolphin population of the Moray Firth SAC in respect of the export cable corridor and Offshore Innovation Platform .

During the Scoping Workshop, we agreed that the Inner Hebrides and the Minches SAC for harbour porpoise can be screened out. We are also content that SACs for harbour and grey seal can be screened out from further assessment.

We agree that the HRA Screening Report does not address ncMPAs, and we are content that the Southern Trench ncMPA will be considered and addressed in more detail in the EIA Report – see above for further advice.

---

<sup>23</sup> <https://tethys.pnnl.gov/stories/span-scottish-passive-acoustic-network>

NECRIFG

**From:** [Redacted]  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Ben Walker](#)  
**Subject:** Re: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024  
**Date:** 27 February 2024 13:53:15

---

Good afternoon

The NECRIFG response was included with the SFF response. Could you please make sure that is noted.

Thank you

Jennifer  
Sent from my iPhone

On 27 Feb 2024, at 13:22, MD.MarineRenewables@gov.scot wrote:

Dear Sir/Madam,

Please note that the consultation period for the above application concluded on the 19 February 2024. As MD-LOT did not receive a response from you by this deadline, we have assumed a nil response.

Kind regards  
Iain

**Iain MacDonald**  
**Marine Licensing & Consenting Casework Officer, Licensing Operations Team,**  
**Marine Directorate**  
Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB  
[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

**The Scottish Government**

<image001.png>

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[Marine licensing and consenting: privacy notice - gov.scot \(www.gov.scot\)](https://www.gov.scot/marine-licensing-and-consenting-privacy-notice)

---

**From:** MD Marine Renewables  
**Sent:** Thursday, January 18, 2024 9:47 AM  
**To:** MD Marine Renewables <MD.MarineRenewables@gov.scot>  
**Cc:** Rosanne Dinsdale <Rosanne.Dinsdale@gov.scot>; Ben Walker <Ben.Walker@gov.scot>  
**Subject:** SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February



2024

Dear Sir/Madam,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007  
REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
(collectively referred to as the “EIA Regulations”).**

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Approximately 50km East of Wick**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Stromar Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

#### **HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Stromar Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal (“HRA”) Screening Report. The HRA Screening Report provides information to enable the screening of the Stromar Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by

**19 February 2024.** If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a “nil return” response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Yours faithfully,  
Iain

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB  
[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

**The Scottish Government**

<image001.png>

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\*\*\*\*\*

NLB



# Northern Lighthouse Board

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Website: [www.nlb.org.uk](http://www.nlb.org.uk)  
Email: [enquiries@nlb.org.uk](mailto:enquiries@nlb.org.uk)

Your Ref: SCOP-0039 – Stromar OWF Scoping Report  
Our Ref: AL/OPS/ML/WIND\_007\_24

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

19 January 2024

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017, REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 & REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2007**

**Request for Scoping Opinion for Proposed Section 36 Application and Marine Licences for the Stromar Offshore Wind Farm Located Approximately 50km East of Wick**

Thank you for your e-mail correspondence dated 18<sup>th</sup> January 2024 relating to the Scoping Report submitted by **Stromar Offshore Windfarm Ltd** in relation to the proposed Stromar Offshore Windfarm development located approximately 50 kilometres east of Wick, Caithness.

NLB have engaged with the developer prior to the Scoping Report submission with regard to the study areas for the project, and note that the Shipping and Navigation chapter will include a 10nM area of search around the finalised position of the HVAC booster station, alongside the Array Area and the Export Cable Corridor.

Northern Lighthouse Board note the inclusion of Chapter 14 – Shipping and Navigation within the report, with particular reference to Section 14.5 (Scoping of Impacts) and Section 14.6 (Potential Cumulative Impacts).

NLB also note within Table 14.2 (Embedded Commitments) and the commitment to develop a Lighting and Marking Plan in conjunction with NLB covering both the Construction and Operational & Maintenance phases of the project.

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NLB have no objection to the content of the Scoping Report, and no suggestions for additional content.

Yours sincerely  
[Redacted]

Peter Douglas  
Navigation Manager

Rosehearty Harbour and Inshore Fishermans  
Association - Comments

## **Stromar offshore windfarm (to be read along with attached e-mail)**

*This document was originally compiled as a basis for a meeting with Stroma reps at the end of January 2024.*

***General RHIFA comments re; meeting with Project team 31/01/24 follow up meeting held with Stroma project team and Brown and May reps 27/02/24***

***RHIFA has approximately 30 members and represents 14 active commercial licensed fishing vessels and 4 non-commercial. The majority of vessels are under 7M with a few being in the 8 m range. With exception of occasional excursions, the majority fish the area between Troup Head to the West and Sandhaven to the East and out to approximately 5 miles offshore. Fishing mainly for Mackerel, Lobster, brown crab and velvet crab between April and November each year (weather dependant). There are an additional 2 commercial fishing vessels operated from Rosehearty that are not members of RHIFA. Arguably RHIFA members make up the majority of inshore fishing vessels mostly affected by the inshore cable route and landfall location.***

Given the exposed North facing coastline, the Rosehearty fleet has little or no protection from onshore or offshore wind. With changing weather patterns, more frequent storms, periods of high winds and the relatively small size and low speed of the vessels, the fleet operating from Rosehearty restrict their activities (typically) to within a 4-to-5-mile radius of the harbour. Therefore, moving fishing grounds is not an option without moving harbour location. The fishing fleet remove their vessels from the harbour during October or November each year (weather dependant) as the Harbour is not a safe haven during the winter months.

Info... cable size and energy throughput??, trench 7.5 m wide and up to 4m deep but more likely 1 to 2 m. Area of disturbance 40m. This info came from report however Stroma reps indicate as little as 0.6m deep trench!

Operational 2030 to 2033.

### **General comment**

- ***To review a document of the size and (scientific) nature presented is potentially way beyond the capabilities of lone fishermen and small organisations. It would have been more appropriate to present a sub package to individual affected groups (e.g. RHIFA – Commercial fishing, inshore cable routes and landfall). This would make it a lot less complicated and easier to navigate and provide relevant feedback. And use the detailed report as a reference document. If this approach was adopted we believe fishermen are more likely to provide valuable feedback.***
- ***When will surveys take place?***
- ***When will decision on final routing and landfall be made?***
- ***When will inshore and landfall cable works take place?***

### **Comments EIAR**

1. Pre-scoping consultation for fisheries commenced in September 2022. Why was RHIFA not consulted before now? – Re 4.2.2 baseline conditions and decision making for route planning?

2. Note the first contact about this development came within the official request from MS lot for comment on the scoping document. Way too late as highlighted.
3. Table 4.1 “Commercial Fishing”; Consultation start date September 2022 with NECRIFG (*RHIFA is a participating party*) & local commercial fishing interests also SFF & SWFPA. We have no knowledge of NECRIFG contact in relation to this which is surprising as **RHIFA members and community will arguably be the most affected by the inshore section of these works.**
4. Table 4.1 Introduction of FLO to stakeholder groups. This is the first official contact made with RHIFA which is extremely surprising since the proposed cable route(s) all cut across the majority of our dedicated fishing areas. We have not had the opportunity to influence the inshore (<6 miles) cable route and landfall location when the corridor was reduced from 10KM to 3 KM after stakeholder engagement. This could lead to a significant impact on our limited fishing grounds that could potentially have been avoided with earlier consultation.
5. What stakeholders were consulted to enable the proposed inshore cable routes and landfall locations to be proposed?
6. Table 4.3 States “Continued engagement to discuss strategic / regional impacts and possible commitments.....” – Can the cable route and landfall location be assessed taking into account RHIFA comments?
7. Page 346 – discussion re : cable route and landfall. Note; Specific Mackerel grounds at Clythe and Hard ground (inside shin). *These are local terms for fishing ground locations.* Essentially the majority of our important fishing grounds are within all the cable routes proposed.
8. Note: offshore crab ground (edge of deep). At edge of 50 M depth contour is wher the majority of cram pot / fishing is located.
9. Note: limited opportunity elsewhere to fish ....discussion ( re range – lack of alternative grounds – distance time and weather). We have no option to fish in the areas defined due to the previously highlighted areas therefore do not want the cable routes to encroach into these areas if at all avoidable.
10. Page 343; 344; 13.9.1 scoping Q’s – 1, 3, 4, 8 We do not have VMS therefore the report does not have the information relating to our fishing patterns and or the changes seen in recent years, re mackerel fishery changes. – Discuss.... There isa very significant fishery within this area between April and November each year and to a lesser extent out with these times.
11. Re studies – Is there data available re; the short and long term effects of cable installation and operation re-trenching , short term disturbance and long term effects re; magnetic fields? Have exposure levels been determined? Studies on the effects on specific shellfish and pelagic fish. (Mackerel in particular)? We are not convinced that there have been sufficient long-term studies carried out into many aspects of the effect of cable laying and cable operations to be able to determine short or long term effects with any degree of certainty.
12. Page 342 13.8.2 ground-truth available baseline data. – discuss. RHIFA members were not consulted on this at an early enough stage in the process.
13. Page 341 13.6.3 &13.6.4 – Consideration on impacts from displacement of inshore fleet that have limited operational range or alternative grounds / species to prosecute. I note that the term “screen out” appears throughout the fisheries section and gives the impression that due consideration may not be given to the voices of those that are not represented by a large organisation, or indeed are inshore fishers!
14. Page 124 7.3.16 & 17 – cliff levels fall East of Rosehearty not West . Also info in this section appears to be out of date due to changing weather patterns we are seeing shifting sands and local costal erosion that has not been observed before.



15. Page 94 onwards ; 5.4 & 5.5 (5.7) why is key inshore fisheries not part of the BRAG for cable corridor constraints appraisal? Note; the corridor to West of Rosehearty goes through or is adjacent to a previous RAF target practice range.
16. Commitments table 10.5 – only commitment to “potentially” carry out further detailed assessment for a range of issues that will affect fishing for mackerel and shellfish locally; re sediment, habitat disturbance, shellfish damage, noise etc. Again this is viewed as a lack of commitment to follow up on these significant impacts with due consideration.
17. Potential landfall comes through a SSSI. Does this figure in assessment?
18. The whole inshore area of cable route is within an MPA? Southern trench or adjacent could not be avoided but other areas within the route can be avoided.
19. Outline safety zones during installation and ops/ maintenance (inshore and landfall) need defined.

### **Commitments and Commitments register**

General for Fish and Shellfish ecology (10) and Commercial fisheries (13) – Common thread appears to be a lack of commitment to follow up and consider as “Significant effect (LSE)” re; common statement “Possible LSE without secondary commitment measures. However, it may become clear post- scoping stage that the impact does NOT require detailed assessment in EIAR”.

*Exceptions being....Gear conflict re C-OFF-29 & 13, Reduction in access C-OFF (many)*

C-OFF-26 is important to us (RHIFA) ; re optioneering of cable route.

C-OFF-27 liaison best practice (late??)

C-OFF-29 Fisheries Management and Mitigation strategy.

- **In conclusion - it appears inshore fisheries is apportioned a relative low priority- given the significant effects these works may have on our livelihood both during the construction phase and operational phase. We do not want the cable route transiting our important fishing grounds given the lack of proper study into the short and long term effects and the apparent lack of commitment to follow up on amber type issues with the repetitive statement that issues may not be followed up on.**

C-OFF-56 “A walkover survey of the intertidal element of the study area w11 be undertaken to Inform the understanding of the existing marine heritage assets and also the potential for unknown material to be uncovered” – discuss. RHIFA were not consulted and should have been.

Socio- economics page 488 & 490 COFF-29 & 17 & 27 Potential disruption to commercial fishing sector leading to changes in economic activity in sector. – LSE without secondary measures. Does RHIFA inshore fishing activity carry much weight / significance within this consideration? What effects or unknown effects would it take to change the routing or significantly influence the routing and landfall? What criteria is used and is it weighted?

### **Impacts register**

I-C-03 ; landfall (amber) discuss re comments relating to SSSI.

I-C-01/ 02/ 04 (amber) discuss re MPA etc etc. Note: MPA is not just the southern trench.

I-C-10/11/12 – Water quality (red) - also drilling mud?

I-C-15 – Bathing water quality (red) – beach nearby (potentially)

I-C-20 /24 to 31 (amber) habitat disruption.

I-C-35 – Electromagnetic field effects.

5; Fish and Shellfish ecology

I-C-38 -to I-C-48 general as above also Electromagnetic effects (amber). **Is this fully understood re short and long term effects? – very much a major concern for RHIFA. We believe that much more work needs done to fully understand this subject and until this is done shellfish and important inshore fishing grounds should be avoided.**

**A recent study into by MSS “Crab and lobster fisheries - stock assessments: results 2016 to 2019” indicates that the shellfish stocks around Scotland are being fished at or near their Minimum Sustainable Yield “MSY” The study does not appear to take into account environmental factors or even works of the nature proposed in this scoping document. MS have indicated that management controls are required in the near future. On this basis the scoping report should include due consideration to these stocks and set out to minimise impact that may exacerbate an already concerning issue.**

Rosehearty Harbour and Inshore Fishermans  
Association

**From:** [Redacted]  
**To:** [MD Marine Renewables](#); [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Ben Walker](#)  
**Subject:** Re: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024  
**Date:** 28 February 2024 15:02:48  
**Attachments:** [Comments MD lot.docx](#)  
[image001.png](#)

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Hi

Thank you for allowing myself on behalf of Rosehearty Harbour and Inshore fisherman's Association (RHIFA) the opportunity to comment on the Stromar scoping and HRA screening reports.

I've appended a word document containing our comments in relation to the proposed development. Please be aware that this is the first time that our members have been presented with a document of this nature that is extremely large, highly technical and contains a plethora of scientific terms etc that we have found difficult to interpret.

With the documents containing multiple sections covering a number of stages in the development I, personally, found that a number of my intended responses became duplicated as they applied to each section or stage of the development. However I have attempted to condense these into "general" comments.

Please note that our comments may not strictly adhere to the request for comments in relation to "what we feel should be included or excluded" from the document.

Our comments have been made in the context on how this development may affect our members and our community; specifically in relation to the proposed inshore cable routing and potential landfall sites, and will mainly reflect our members knowledge and expertise as it relates to inshore fishing. I'm sure other interested parties will cover issues associated with MPA's / SSSI's etc.

regards

David D Whyte  
RHIFA

On Thursday, 18 January 2024 at 09:46:37 GMT, <[md.marinerenewables@gov.scot](mailto:md.marinerenewables@gov.scot)> wrote:

Dear Sir/Madam,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

**(collectively referred to as the "EIA Regulations").**

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In addition, Stromar Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal ("HRA") Screening Report. The HRA Screening Report provides information to enable the screening of the Stromar Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **19 February 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Yours faithfully,

Iain

**Iain MacDonald**

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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\*\*\*\*\*

# Scottish & Southern Electricity Networks

Scottish Hydro Electric Transmission Plc.  
10 Henderson Road  
Inverness  
IV1 1SN

Stromar Offshore Wind  
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2 Lochrin Square  
96 Fountainbridge  
Edinburgh  
Scotland  
EH3 9QA

and

**Marine Scotland – Licensing and Operations Team**

By email: [MS.MarineRenewables@gov.scot](mailto:MS.MarineRenewables@gov.scot)

22 February 2024

Dear Sir/Madam,

**REF: SCOP-0039 Stromar Offshore Wind Farm Environmental Impact Assessment: Offshore Scoping Report**

Thank you for the opportunity to respond to the Scoping Report associated with the Stromar Offshore Wind Farm (SCOP-0039).

Scottish Hydro Electric Transmission Plc (SSEN Transmission) welcomes the inclusion of the Shetland HVDC subsea cable link in the Stromar Offshore Wind Farm Scoping Report.

As part of our responsibilities to deliver and maintain critical national transmission infrastructure within and connecting the North of Scotland, which is required to support Net Zero targets, SSEN Transmission is currently developing additional electricity transmission subsea cable projects that may interact with the identified areas for Stromar Offshore Wind Farm, associated export cables, and potential landfall locations. These projects include a subsea HVDC connection between Spittal, in Northern Scotland, and the Peterhead area ([Spittal – Peterhead Subsea Cable Link - SSEN Transmission \(ssen-transmission.co.uk\)](#)).

We recognise that final decisions on export cable routes for the Stromar Offshore Wind Farm project have not yet been made. SSEN Transmission request that present and future cables, both power and telecoms, are given due consideration and that the provision is maintained for cables to cross both export cables and the generation site, and that the freedom of the seas is maintained.

SSEN Transmission remains committed to working with other legitimate users of the sea in a proactive manner, enabling all parties to deliver successful projects wherever reasonably possible. We would welcome ongoing discussion and consultation between both parties as projects progress, and where necessary that proximity and crossing agreements are developed.



I would be happy to discuss any questions or concerns in relation to the above.

Yours Sincerely,  
[Redacted]

**Raeanne Miller**

Senior Marine Consents and Environment Manager

[Raeanne.Miller@sse.com](mailto:Raeanne.Miller@sse.com)

Scottish Environment protection Agency

**From:** [Planning.North](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** PCS-20000118 SEPA Response to SCOP-0039  
**Date:** 23 January 2024 14:26:41  
**Attachments:** [image.png](#)

---

Dear Iain MacDonald

## **Marine (Scotland) Act 2010**

### **SCOP-0039**

#### **Stromar Offshore Wind Farm – EIA Scoping Opinion for offshore windfarm Scotwind NE3 Site - Approximately 50km East of Wick**

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

**If there is a significant site-specific issue, not addressed by our guidance or other information provided on our website, with which you would want our advice, then please reconsult us highlighting the issue in question and we will try our best to assist.**

I trust these comments are of assistance - please do not hesitate to contact me if you require any further information.

Kind regards,  
Clare Pritchett  
Senior Planning Officer



**For the future of our environment**

#### Disclaimer

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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](mailto: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.

Scottish Fisherman's Federation



Our Ref: FH-StrOWF/24-0001

Your Ref: SCOP-0039

Scottish Fishermen's Federation  
24 Rubislaw Terrace  
Aberdeen, AB10 1XE  
Scotland UK

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

E-mail:

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

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

19 February 2024

Dear Iain MacDonald,

### **SFF Response on Stromar Offshore Wind Farm Project EIA Scoping Consultation**

This response to the scoping request is presented by the Scottish Fishermen's Federation on behalf of the 450 plus fishing vessels in membership of its constituent associations, the Anglo Scottish Fishermen's Association, Fife Fishermen's Association, Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association. The chair of NECrIFG has also been consulted and agrees.

#### **General comments**

SFF note from section 3.2 of the Report that the Project Design Envelope (PDE) approach (also known as the 'Rochdale Envelope') has been adopted for the Environmental Impact Assessment (EIA) Report. Therefore, the following comments are based on existing details provided in this Scoping Report and further comments will be shared in due course once the Project's design is finalised.

#### **Wind Turbine Generator (WTGs) foundation/spatial footprint**

SFF notes from section 'Wind Turbine Foundations' (pp65-68) that depending on the water depth in the project area (which is from c.60 -100m) both floating (namely, spar, TLP, semi-submersible and barge) and fixed foundations designs would be considered in the EIA.

Being concerned of the spatial footprint of floating WTGs and the potential snagging hazard that their moorings system creates to fishing vessels, SFF would propose to the Applicant to use the fixed foundation design for as much WTGs as possible (as a fixed foundation wind farm in a water depth of c.70m exist in Scottish water).

Where use of fixed foundation WTGs is not feasible due to technical issues, in such situations, SFF's first preferred WTG floating foundation option is TLP, and Spar to be the second/last preferred

Members:

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

VAT Reg No: 605 096 748

option since they have lesser spatial footprint on seabed. For the same reasons, SFF's preferred mooring system is 'tension mooring' as defined under sub-section 3.4.25 (p68) of the Report.

### **Power Cables (Inter-Array (IACs), Export and Interlink)**

SFF note from 'Electrical Infrastructure' section (Table 3.4, pp71) that 3 export cables (with corridor length of 126km), 71 IACs (length to 720km) and 5 interlink cables (length of c.20km) is considered for the development. Cables will initially be trenched and buried (burial depth of 4m) and where cable burial is not feasible due to ground condition or existence of other cables and pipelines, some form of armouring will be used to maintain the integrity of the cables. Methods may include sandbags, rock placement, concrete mattresses, fronded mattress, rock bags, metal or plastic protective half shell sleeves.

Being concerned of fishermen's safety, first of all, SFF would suggest to the Applicant to make all efforts to reach the required depth of cable burial and avoid using cable protection measures as much as possible since the volume of cable protection mass will disrupt the marine habitat and would create snagging hazard for fishing vessels within array area, intelink and export cables routes.

In terms of using cable protections, SFF are opposed to using concrete mattresses and rock bags in open water since they create severe snagging hazards for bottom trawl fishing vessels and static gears. SFF's preferred cable protection measure is rock dump/protection considering industry standard rock size (1"- 5") with a 1:3 profile followed by an overtrawl sweep alongside a long-term monitoring programme. We do not object to use of sandbags in cable protection works as long as their size are small (not too big) to create snagging hazard for fishing vessels.

In terms of crossing point, as they create obstacles and snagging hazard to the fishing industry, SFF would suggest that the cable crossing should be avoided as much as possible otherwise the design of cables and pipelines crossing points should be consulted with fishing industry to ensure their impacts are mitigated.

### **Offshore Structures**

SFF notes from Table 3.5: 'Maximum Design Scenario for Offshore Platforms' (pp76-79) of the Report that there will be 3 Offshore Substations, one Offshore Reactive Compensation Substation, one Offshore Accommodation Platform, and one Offshore Innovation Platform built within the array area. Since the proposed offshore platforms will have large footprints, we request to be consulted on the platforms site selections to ensure they do not set on any prime fishing ground.

### **Boulder Clearance**

SFF notes from section 3.6 Pre-Construction Phase, para 3.6.4 (p80) that depending on the outcome of the surveys, the Proposed Offshore Development may require boulder clearance activities. Where a high density of boulders is encountered, a displacement plough is utilised. Where a low density of boulders is observed, it is possible infrastructure may be micro-sited to avoid clearance.

Since the relocation of boulders from their natural positions and re-positioning them on new surface causes snagging hazard for fishing vessels, SFF would suggest avoiding the relocation of boulders as much as possible. However, where boulders relocation is unavoidable, we recommend the new locations/coordinates of the relocated boulders should be recorded and shared with fishermen. Fishermen require geographical readings to decimal of a minute format (3 decimal

places sufficient) rather than going down to actual seconds and the datum should be WGS84 rather than ED50.

### **Wet Storage**

SFF notes from section 3.7 Construction Phase, paras 3.7.3 and 3.7.10 of the Report that there may be a requirement to wet store cables and anchor components and substructures. SFF would like to see a 'designated wet storage' area outwith the routes of fishing vessels and the harbours are considered to avoid any disruptions to fishing vessels operations/activities.

### **Decommissioning**

SFF note from the para 3.8.5 (p86), of the Report that the Applicant will submit a decommissioning programme for approval by Scottish Ministers. Specific details on the decommissioning activities are not known at this stage of consent but it is anticipated that the site will be restored and all structures above the seabed or ground level will be completely removed. To reiterate safety concern of the fishing vessels, SFF would like to see all development related infrastructures are recovered/removed to shore followed by overtrawl sweeps (seabed sweeps using fishing gears). The seabed is restored to its pre-development condition post-decommissioning, and it is safe for fishing operations to fully resume in the area.

## **Ch. 9 Benthic Subtidal Ecology**

### **9.9 Scoping Questions**

Following are the SFF's response on the relevant scoping questions:

**Question:** Do you agree that all receptors related to benthic and intertidal ecology have been identified?

**SFF's answer:**

SFF would like to see the "Impacts to benthic invertebrates due to thermal emissions from subsea electrical cables" to also be scoped in since any temperature change in the invertebrate's habitat would have adverse effects on their behaviour and increase their mortality rate.

**Question:** Do you agree with the Scoping In and Out of impact pathways in relation to benthic and intertidal ecology?

**SFF's answer:**

SFF is happy to see the Electromagnetic field (EMF) effects generated by inter-array and export cables is scoped in. However, we noted from the 'Proportionate EIA; that no LSE identified at Scoping. As there is no solid science to reject the impact of EMF on marine lives especially the invertebrates, we wonder how it is concluded that there will be 'no LSE identified at Scoping'? SFF would like to see the EMF effects of cables is further studied and analysed to scientific proofs in relation to the EMF effects on marine environment is presented.

## **Ch. 10. Fish and Shellfish Ecology**

### **10.9 Scoping Questions**

**Question:** Do you agree with the study area(s) defined for fish and shellfish ecology?

**SFF's response:**

No. We think the ICES Rectangle 46e8 needs to be included into the study area too due to the displacement from the nearby location of Broadshore/Sinclair/scaraben which will displace fishers into other waters.



## Ch. 13. Commercial Fisheries

### 13. Scoping Questions

**Question:** Do you agree with the study areas defined for commercial fisheries?

**SFF's response:**

No. We think the ICES Rectangle 46e8 needs to be included into the study area, too.

**Question:** Do you agree with the use of data listed in Table 13.1 being used to inform the Offshore EIAR?

**SFF's response:**

We would recommend the following to be considered:

- In terms of the source "MMO (2023a), UK annual fisheries landings statistics: MMO, 2017 to 2021", dataset for this needs to be broadened to pre-brexit and outwith covid.
- Para 13.3.3 refers to 'ScotMap inshore fisheries mapping' as a useful source of insight into commercial fisheries activity undertaken in inshore areas. As Scotmap was lastly updated in July 2013, it is well outdated so cannot be used to determine accuracy.
- We note from para 13.3.4 that consultation with representatives of fishermen's associations and organisations has been and will continue to be undertaken to seek to corroborate the findings of desk-based baseline data analysis and to provide insight into specific fishing grounds and activity of any vessels active in the area. SFF requires an ongoing commitment to proceeding with this engagement.
- We also are extremely concerned that the fishers that will be most affected by the export cable route making landfall were not consulted prior to this scoping report being made public. This falls well short of early engagement, and we can only hope that the engagement improves in line with the potential project.

**Question:** Are there any further data sources or guidance documents that should be considered?

**SFF's response:**

We would recommend ongoing consultation with fishing industry to get up-to-date required fisheries data and the authentication of the data accuracy would be beneficial.

**Question:** Do you agree on the suitability of the proposed commitments to reduce or eliminate LSE relevant to commercial fisheries?

**SFF's response:**

SFF has the following comments on the proposed commitments:

1. C-OFF-29: the Fisheries Management and Mitigation Strategy (FMMS) to be developed and adopted pre-consent in consultation with fishing industry to ensure all fishing industry's concerns are considered and addressed accordingly.
- C-OFF-43: Development of a Navigational Safety Plan (NSP), that will include Notice to Mariners (via Kingfisher Bulletins or other appropriate methods). We suggest the NtM are issued in sufficient time to avoid any disruptions to the fishing activities in the intended area.

We would propose the following mitigation measures/commitments to be considered too:

2. As part of the proposed commitments, there is no measure for disruption payments for the fishing vessels. SFF suggest that the cooperation agreement should be considered for both the static and mobile gears where they are required to be relocated.
3. Utilise the services of an O.F.L.O due to the location in relevance to fishermen.
4. Adhere to ColRegs at all times.

## Ch. 14. Shipping and Navigation

### 14.9 Scoping Questions

**Question:** Do you agree with the proposed shipping and navigation study area and that it is sufficient to capture the relevant impacts?

**SFF's response:**

We agree with the proposed study area, but we reserve an observation on the accuracy of data at the Figure 14.3: Vessels by Type (28 Days, Summer and Winter 2022). We recognise that this is a 28-day survey but our records show that there are more fishing vessels navigation through the site e.g. pelagic vessels than depicted at the mentioned figure.

**Question:** Do you have any additional comments relating to the use of floating WTG technology specifically and potential associated additional commitment options (e.g., operational safety zones) in relation to navigational safety impacts?

**SFF's response:**

See 'Wind Turbine Generator (WTGs) foundation/spatial footprint' under General comments of this response.

In conclusion, SFF stresses that our primary concern is protecting the rights of fishermen to safely undertake their trade, and this is the cornerstone of our response. Our position is that fishing activities should continue unaffected and unharmed post-development. If fishermen impacted are to be denied the right to earn their living, we could not support the development of any proposal for a windfarm.

Best regards  
[Redacted]

Mohammad Fahim Hashimi  
**Offshore Energy Policy Manager**  
**Scottish Fishermen's Federation**

Scottish Water

Tuesday, 23 January 2024



Marine Licensing  
375 Victoria Road

Aberdeen

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

Development Operations  
Freephone Number - 0800 3890379  
E-Mail - [DevelopmentOperations@scottishwater.co.uk](mailto:DevelopmentOperations@scottishwater.co.uk)  
[www.scottishwater.co.uk](http://www.scottishwater.co.uk)



Dear Customer,

**Stromar Offshore Wind Farm, Fraserburgh, AB43 9RT**  
**Planning Ref: SCOP-0039**  
**Our Ref: DSCAS-0102041-52G**  
**Proposal: Offshore Wind Farm**

**Please quote our reference in all future correspondence**

## **Audit of Proposal**

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

## **Asset Impact Assessment**

Scottish Water records indicate that there is live infrastructure in the proximity of your development area that may impact on existing Scottish Water assets.

The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via [our Customer Portal](#) for an appraisal of the proposals.

The applicant should be aware that any conflict with assets identified will be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response.

Written permission must be obtained before any works are started within the area of our apparatus

## Drinking Water Protected Areas

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

## Surface Water

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

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

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

### **General notes:**

- ▶ Scottish Water asset plans can be obtained from our appointed asset plan providers:
  - ▶ Site Investigation Services (UK) Ltd
  - ▶ Tel: 0333 123 1223
  - ▶ Email: [sw@sisplan.co.uk](mailto:sw@sisplan.co.uk)
  - ▶ [www.sisplan.co.uk](http://www.sisplan.co.uk)

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

Yours sincerely,

### **Angela Allison**

Development Services Analyst

[PlanningConsultations@scottishwater.co.uk](mailto:PlanningConsultations@scottishwater.co.uk)

### Scottish Water Disclaimer:

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

Scottish Whitefish Producers Association Limited

**From:** [Raymond Hall](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Ben Walker](#)  
**Subject:** Re: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024  
**Date:** 27 February 2024 13:27:07  
**Attachments:** [image001.png](#)

---

Hi Iain

Just for clarity the SWFPA response is encompassed within the SFF response, I assume you have received a response from the SFF.

Kind regards

Raymond Hall  
Renewable Energy Policy Officer  
Scottish Whitefish Producers Association Limited  
Email: [raymond@swfpa.com](mailto:raymond@swfpa.com)  
[Redacted]  
Website: [www.swfpa.com](http://www.swfpa.com)

---

**From:** MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>  
**Date:** Tuesday, 27 February 2024 at 13:22  
**To:** MD.MarineRenewables@gov.scot <MD.MarineRenewables@gov.scot>  
**Cc:** Rosanne.Dinsdale@gov.scot <Rosanne.Dinsdale@gov.scot>, Ben.Walker@gov.scot <Ben.Walker@gov.scot>  
**Subject:** RE: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

Dear Sir/Madam,

Please note that the consultation period for the above application concluded on the 19 February 2024. As MD-LOT did not receive a response from you by this deadline, we have assumed a nil response.

Kind regards  
Iain

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB  
[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

**The Scottish Government**



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---

**From:** MD Marine Renewables

**Sent:** Thursday, January 18, 2024 9:47 AM

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

**Cc:** Rosanne Dinsdale <Rosanne.Dinsdale@gov.scot>; Ben Walker <Ben.Walker@gov.scot>

**Subject:** SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

Dear Sir/Madam,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

(collectively referred to as the “EIA Regulations”).

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind  
NE3 Site - Approximately 50km East of Wick**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Stromar Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Stromar Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal



("HRA") Screening Report. The HRA Screening Report provides information to enable the screening of the Stromar Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **19 February 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Yours faithfully,  
Iain

**Iain MacDonald**

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

**The Scottish Government**



Integrity

Inclusivity

Innovation

Collaboration

Kindness

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

\*\*\*\*\*  
\*\*\*\*\*

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\*\*\*\*\*

\*\*\*\*\*

Sports Scotland

**From:** [Gillian Kyle](#)  
**To:** [MD Marine Renewables](#)  
**Subject:** RE: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024  
**Date:** 31 January 2024 15:03:11  
**Attachments:** [image001.png](#)

---

Good afternoon,  
RYAS are aware of project. No objections from **sportscotland**.  
Thanks, Gillian

---

**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>  
**Sent:** Thursday, January 18, 2024 9:47 AM  
**To:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)  
**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Ben.Walker@gov.scot](mailto:Ben.Walker@gov.scot)  
**Subject:** [EXTERNAL] SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

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Dear Sir/Madam,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

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(collectively referred to as the “EIA Regulations”).

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Approximately 50km East of Wick**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Stromar Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project**. In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Stromar Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal (“HRA”) Screening Report. The HRA Screening Report provides information to enable the screening of the Stromar Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified. Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **19 February 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Yours faithfully,

Iain

**Iain MacDonald**

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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**Aithris-àichidh** – Tha am post-d seo diomhair agus air a rùnachadh a-mhàin don neach gu bheil e air a sheòladh. Mura h-e thusa an neach sin, feuch gun cuir thu às don phost-d seo is ceangalan sam bith agus leth-bhreacan uile, agus cuir fios sa bhad gu an neach-seòlaidh. Cuimhnich mas e do thoil e gu bheil cleachdadh neo-ùghdarraichte sam bith air an sgrìobhainn seo air a thoirmeasg gu tur.

Mar bhuidheann poblach, tha **spòrsalba** a' tighinn fo riatanasan an Achd Saorsa Fiosrachaidh (Alba) 2002 a thaobh foillseachadh air fiosrachadh sam bith (a' gabhail a-steach conaltradh eileagtronaigeach) a dh'fhaodadh a bhith aige mu chuspair sònraichte, nuair a thèid sin iarraidh air le neach no buidheann sam bith. Ma bhios dragh ann mu dheidhinn seo, is urrainn do **spòrsalba** comhairleachadh mun chùis. Gus teagamh a sheachnadh, bidh co-dhùnadh **spòrsalba** deireannach a thaobh ceistean foillseachaidh is neo-fhoillseachaidh.

Is e **spòrsalba** a tha a' gleidheadh dàta pearsanta a bheir sibh dhuinn ann am puist-dealain sam bith.

Thoiribh an aire gum bi an dàta pearsanta a bheir sibh dhuinn air a stòradh agus/no air a ghiullachd le **spòrsalba** gus seirbheisean a libhrigeadh no conaltradh ribh. Feuch gun tèid sibh gu <https://sportscotland.org.uk/privacy/> airson tuilleadh fiosrachaidh mu làimhseachadh air an dàta phearsanta agaibh.

The Royal Yachting Association

**12 February 2024**

Iain MacDonald  
Marine Directorate – Licensing Operations Team  
Scottish Government, Marine Laboratory,  
375 Victoria Road,  
Aberdeen,  
AB11 9DB  
MD.MarineRenewables@gov.scot

Dear Iain,

**SCOP-0039 – Stromar Offshore Windfarm Limited –  
Stromar Offshore Wind Farm**

I have read the relevant parts of the Stromar scoping report on behalf of RYA Scotland and agree that Shipping and Navigation should be scoped in to the EIA. RYA Scotland wishes to contribute to the Navigational Risk Assessment and will work with our colleagues in the Cruising Association to do so.

Our responses to the questions posed in section 14.9 are as follows:

1. *Do you agree with the study area defined for shipping and navigation?*  
Yes.
2. *Do you agree with the use of data listed in Section 14.3, and any additional data listed in Section 14.8, being used to inform the Offshore EIAR?* Yes.
3. *Are there any further data sources or guidance documents that should be considered?* RYA Scotland and the Cruising Association should be able to provide guidance about the routes taken by recreational vessels sailing between Continental Europe and the UK and *vice versa*.
4. *Do you agree that all receptors (users) and potential impacts (hazards) related to shipping and navigation have been identified?* I agree with what has been written. However, an additional hazard is the loss of Aids to



Navigation on the devices and the time delay before damage can be rectified.

5. *Do you agree with the Scoping In of impact (hazards) in relation to shipping and navigation? Yes.*
6. *Do you agree with the assessment of transboundary effects in relation to shipping and navigation? Yes.*
7. *Do you agree with the assessment of cumulative effects in relation to shipping and navigation? Yes.*
8. *Do you agree with the proposed assessment methodology for shipping and navigation? Yes.*
9. *Do you agree on the suitability of the proposed commitments to reduce or eliminate LSE relevant to shipping and navigation? I agree with the commitments made to reduce or eliminate the Least Significant Effects. Please note, however, the significant time lag between data being received by the UKHO and the changes being implemented on the electronic charts used by most recreational sailors.*
10. *Do you have any additional comments relating to the use of floating WTG technology specifically and potential associated additional commitment options (e.g., operational safety zones) in relation to navigational safety impacts? We do not consider that there are significant additional risks to recreational boaters from the use of floating WTG technology.*

Yours sincerely,  
[Redacted]

Dr G. Russell FCIEEM(retd) FRMetS  
Planning and Environment Officer, RYA Scotland

## Transport Scotland advice

Iain MacDonald  
Marine Directorate  
375 Victoria Road  
Aberdeen  
AB11 9DB

Your ref:  
SCOP-0039

Our ref:  
GB01T19K05

Date:  
16/02/2024

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

Dear Sirs,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2017**

**SCOP-0039 - STROMAR OFFSHORE WINDFARM LIMITED – STROMAR OFFSHORE WIND  
FARM – SCOTWIND NE3 SITE - APPROXIMATELY 50KM EAST OF WICK**

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report prepared by GoBe Consultants Ltd in support of the above development.

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

**Proposed Development**

The proposed development of Stromar Offshore Wind Farm (OWF) comprises a maximum of 71 turbines with a maximum blade tip height of 385m and up to three offshore substations (OSS), to be located approximately 50km east of Wick with a landfall location between Rosehearty and Fraserburgh. The nearest trunk road to the site is the A90(T) at Fraserburgh.

**Assessment of Environmental Impacts**

The Scoping Report states that the Offshore Environmental Impact Assessment (EIA) will consider all activities associated with the project extending seawards from MHWS, referred to as the Proposed Offshore Development.

We note that a separate Onshore EIA will be prepared which will consider all activities associated with the onshore transmission aspects of the project extending landwards from MLWS. This will include the Landfall Development Zone, Onshore Export Cable Corridor (Onshore ECC), Onshore Substation/Converter Station and associated infrastructure (such as construction compounds and lay down areas).

We also note that the Onshore EIA will contain a Chapter on the assessment of Traffic and Transport. Transport Scotland is satisfied that the potential traffic related impacts associated with the proposed development will be considered within the Onshore EIA, therefore, we can confirm that we have no further comment to make on the Offshore Scoping Report.

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

Yours faithfully

[Redacted]

**Gerard McPhillips**

**Transport Scotland  
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

UK Chamber of Shipping

**From:** [Robert Merrylees](#)  
**To:** [MD Marine Renewables](#)  
**Cc:** [Rosanne Dinsdale](#); [Ben Walker](#)  
**Subject:** RE: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024  
**Date:** 28 February 2024 11:28:49  
**Attachments:** [image003.png](#)

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Dear Marine Directorate,

## **The UK Chamber of Shipping Response to the Stromar Scoping Report.**

The Chamber's response is limited to Chapter 14 – Shipping and Navigation and the Chamber has kept to the Scoping Questions as set out in the Chapter.

### **14.9 Scoping Questions**

14.9.1 The following questions refer to the shipping and navigation chapter and are designed to inform the Scoping Opinion and focus the Scoping exercise.

1. Do you agree with the study area defined for shipping and navigation?

*The Chamber agrees with the study area of 10nm as industry standard, however would like to see a cumulative routeing study area of 50nm for the cumulative assessment. This is again industry standard for such projects.*

2. Do you agree with the use of data listed in **Section 14.3**, and any additional data listed in **Section 14.8**, being used to inform the Offshore EIAR?

*The Chamber is satisfied the data listed.*

*The Chamber welcomes additional 12-month of AIS data to provide seasonal smoothing to the MGN 654 compliant survey data.*

*The Chamber would expect to see a longer data set of MAIB analysed as part of the NRA, at least 20 years, given the long period that the development will be erected for.*

3. Are there any further data sources or guidance documents that should be considered?

*The Chamber recommends inclusion of Scottish Government's Sectoral marine plan for offshore wind energy, noting the importance of lifeline ferry services and their need for protection.*

4. Do you agree that all receptors (users) and potential impacts (hazards) related to shipping and navigation have been identified?

*As standard.*

5. Do you agree with the Scoping In of impact (hazards) in relation to shipping and navigation?

*The Chamber believes that should the applicant proceed with floating turbines then loss of station of a turbine should be considered during the construction and decommissioning phases, in particular when the structures are in transit or under tow.*

*In addition, should the development use floating turbines then wet storage areas need to be considered from a navigational risk perspective, including loss of station from a wet storage area as well as displacement of vessels from areas that may typically be*

*used for anchoring activity.*

*The Chamber considers given the specific characteristics of a floating development there are some nuanced differences and additional things to consider. For example, the Lighting and Marking Plan (LMP), need to consider the removal of one or more lit turbines on the boundary for maintenance or repair and how lighting and marking will be managed in such an occurrence.*

*The Chamber does not see impacts relating to Decommissioning within the Scoping Report and finds this an odd omission requiring explanation.*

6. Do you agree with the assessment of transboundary effects in relation to shipping and navigation?

*As standard for transboundary.*

7. Do you agree with the assessment of cumulative effects in relation to shipping and navigation?

*As standard, given the number of cumulative developments at Scoping then this assessment of utmost importance for navigational safety.*

8. Do you agree with the proposed assessment methodology for shipping and navigation?

*As standard, accepted.*

9. Do you agree on the suitability of the proposed commitments to reduce or eliminate LSE relevant to shipping and navigation?

*As standard.*

10. Do you have any additional comments relating to the use of floating WTG technology specifically and potential associated additional commitment options (e.g., operational safety zones) in relation to navigational safety impacts?

*The Chamber recommends the project fully consider the additional risk factors associated with floating offshore wind projects out with those for fixed projects. The risk consultants NASH Maritime produced such a report for ORE Catapult, of which the freely available version is accessible via: <https://www.nashmaritime.com/news/floating-offshore-wind-navigational-planning-and-risk-assessment>*

Hope these comments can be taken into account and apologise for not submitting before.

Look forward to future engagement with the developer post Scoping.

Kind regards,

Robert

**Robert Merrylees**

Policy Manager (Safety & Nautical) & Analyst

**UK Chamber of Shipping**

30 Park Street, London, SE1 9EQ

DD +44 (0) 20 7417 2843

[Redacted]

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[www.ukchamberofshipping.com](http://www.ukchamberofshipping.com)



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**From:** Robert Merrylees  
**Sent:** Wednesday, February 28, 2024 10:54 AM  
**To:** MD.MarineRenewables@gov.scot  
**Cc:** Rosanne.Dinsdale@gov.scot; Ben.Walker@gov.scot  
**Subject:** RE: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

Dear Iain / Marine Directorate.

Thank you for your email to the UK Chamber of Shipping. With apologies but this particular Scoping Consultation was overlooked and should have been responded to.

You will receive a response by the end of the day, which the Chamber hopes can be taken into account.

Kind regards,  
Robert  
**Robert Merrylees**  
Policy Manager (Safety & Nautical) & Analyst

**UK Chamber of Shipping**  
30 Park Street, London, SE1 9EQ

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**From:** [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Sent:** Tuesday, February 27, 2024 1:22 PM

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

**Cc:** [Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot); [Ben.Walker@gov.scot](mailto:Ben.Walker@gov.scot)

**Subject:** RE: SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

Dear Sir/Madam,

Please note that the consultation period for the above application concluded on the 19 February 2024. As MD-LOT did not receive a response from you by this deadline, we have assumed a nil response.

Kind regards  
Iain

**Iain MacDonald**

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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**From:** MD Marine Renewables

**Sent:** Thursday, January 18, 2024 9:47 AM

**To:** MD Marine Renewables <[MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot)>

**Cc:** Rosanne Dinsdale <[Rosanne.Dinsdale@gov.scot](mailto:Rosanne.Dinsdale@gov.scot)>; Ben Walker <[Ben.Walker@gov.scot](mailto:Ben.Walker@gov.scot)>

**Subject:** SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind NE3 Site - Scoping Consultation - Response Required by 19 February 2024

Dear Sir/Madam,

**REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

**REGULATION 13 AND SCHEDULE 4 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT  
ASSESSMENT) (SCOTLAND) REGULATIONS 2007**

**REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)  
(SCOTLAND) REGULATIONS 2017**

(collectively referred to as the “EIA Regulations”).

**SCOP-0039 - Stromar Offshore Windfarm Limited – Stromar Offshore Wind Farm – Scotwind  
NE3 Site - Approximately 50km East of Wick**

In respect of the proposed section 36 application (under the Electricity Act 1989) and marine licence applications under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Stromar Offshore Windfarm Limited has requested the Scottish Ministers adopt a scoping opinion in relation to the above proposed works under the EIA Regulations.

The scoping report submitted by the applicant can be found at: [Scoping Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

To assist the Scottish Ministers in adopting a comprehensive scoping opinion, which will outline the scope and level of detail of information to be provided in the Environmental Impact Assessment (“EIA”) Report to be submitted by the applicant with their proposed section 36 consent and marine licence applications, **please review the scoping report and advise on what you consider should be included within or excluded from the scope of the EIA for the proposed project.** In doing so you may wish to consider any comments you may have regarding data sources, proposed methodologies or the requirement for specific studies.

**HABITATS REGULATIONS APPRAISAL SCREENING REPORT**

In addition, Stromar Offshore Windfarm Limited has submitted a Habitats Regulations Appraisal

("HRA") Screening Report. The HRA Screening Report provides information to enable the screening of the Stromar Offshore Wind Farm with respect to its potential to have a likely significant effect on European sites of nature conservation importance.

The HRA Screening Report can be found at: [HRA Screening Report - Stromar Offshore Wind Farm | Marine Scotland Information](#)

We would appreciate any comments you may have on the HRA Screening Report and your opinion as to whether or not you are in agreement with the European sites identified.

Please submit your response electronically to [MD.MarineRenewables@gov.scot](mailto:MD.MarineRenewables@gov.scot) by **19 February 2024**. If you are unable to meet this deadline, please contact MD-LOT as soon as possible to discuss the possibility of an extension to the consultation period. If you have no comments to make please submit a "nil return" response.

Please be advised that this consultation request relates to the proposed section 36 consent and marine licence applications.

Yours faithfully,  
Iain

**Iain MacDonald**

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

Scottish Government | Marine Laboratory | Aberdeen | AB11 9DB

[Redacted] | E: [Iain.Macdonald3@gov.scot](mailto:Iain.Macdonald3@gov.scot)

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