Offshore Planning Statement

MarramWind Offshore Wind Farm

December 2025

MarramWind

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Contents

1. Introduction

1.1.1.1 This Offshore Planning Statement ("Planning Statement") supports the offshore consent application for the MarramWind Offshore Wind Farm (hereafter referred to as 'the Project') which is wholly owned by ScottishPower Renewables UK Limited (SPR). MarramWind Limited, a subsidiary of SPR, is the Applicant for the Project.

1.1.1.2 The Project is a proposed floating wind farm located in the North Sea, with a grid connection capacity of up to 3 gigawatts (GW). The location of the Project is determined by the Option Area Agreement (OAA), which is the spatial boundary of the Northeast 7 (NE7) Plan Option, as identified within the Scottish Government's Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) publication. The Project's electricity generating infrastructure will be located within the NE7 Plan Option, which is located north-east of Rattray Head on the Aberdeenshire coast in north-east Scotland, approximately 75 kilometres (km) at its nearest point to shore and 110km at its furthest point. An Option to Lease Agreement for the Project within the NE7 Plan Option was signed in April 2022.

1.1.1.3 The components of the Project located seaward of mean high water springs (MHWS) are subject to a suite of consent applications submitted to the Marine Directorate – Licensing Operations Team (MD-LOT), for processing on behalf of the Scottish Ministers.

1.1.1.4 As outlined in **Section 2.3**, these applications are:

- offshore wind farm generation infrastructure within the NE7 Option Agreement Area (OAA): application for electricity generation consent under Section 36 (s.36) of the Electricity Act 1989 and associated application for construction and operational activities under the Marine and Coastal Access Act 2009; and
- offshore transmission infrastructure: multiple applications under both the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009 for proposed transmission infrastructure located within and outwith 12 nautical miles (nm) of shore respectively.

1.1.1.5 SPR is part of the ScottishPower group of companies, operating in the UK under the Iberdrola Group, and is a leading UK renewables developer with over 40 operational windfarms generating 3GW of green energy. ScottishPower is the first integrated energy company to generate 100% green electricity in the UK. Focused on wind energy, smart grids and driving the change to a greener future, ScottishPower is investing £24bn to 2028 on renewable power and transmission and distribution grids.

1.1.1.6 Iberdrola Group is a world leader in the development of offshore wind energy, with five operational windfarms and four major projects under construction. With a committed investment of €8bn from 2025 to 2028, this will give 5.7GW of installed Offshore capacity by 2028. This is part of the €58bn investment plan announced in 2025 by Iberdrola, 35% of which is being invested to grow the overall installed capacity of renewable power to 60GW by 2028.

1.2 MarramWind Offshore Wind Farm

1.2.1.1 The Project's generating and offshore transmission infrastructure will be located in the North Sea, within the 'Scottish Zone' (as defined in the Scotland Act 1998) of the UK Exclusive Economic Zone.

1.2.1.2 The Project's Red Line Boundary is a geographical area within which the offshore wind farm and associated onshore and offshore infrastructure will be located. It represents the boundary identified for the relevant planning and consent applications. The Red Line

Boundary is presented in **Volume 2, Figure 1.1** of the accompanying **Environmental Impact Assessment (EIA) Report** and described in **Volume 1, Chapter 4: Project Description** of the **EIA Report**. In addition to the Project's overall Red Line Boundary, **Volume 2, Figure 4.2** of the **EIA Report** shows the Offshore Red Line Boundary, which is a sub-division of the overall Red Line Boundary.

1.2.1.3 This Planning Statement considers the Project's proposed offshore development, which comprises infrastructure located seaward of MHWS, as set out in **Section 2.3** below.

1.3 Purpose and structure of Planning Statement

1.3.1.1 This Planning Statement supports the determination of the offshore consent applications for the Project, specifically for s.36 consent under the Electricity Act 1989 and marine licences under the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009. This document is structured to facilitate efficient review by MD-LOT and Scottish Ministers, ensuring that all relevant policy, legislative, and technical considerations are clearly addressed.

1.3.1.2 This Planning Statement demonstrates the need for the Project, the benefits of the proposed offshore generation and transmission infrastructure and provides a robust assessment of compliance with applicable policies and regulations. In doing so, the Statement provides a robust justification for the granting of relevant offshore consents for the Project.

1.3.1.3 This Planning Statement sets out the relevant wider climate change and energy policy that underpins UK and Scottish legislation and provides context to demonstrate the overall *"needs case"* and benefits for the proposed associated offshore generation infrastructure and associated electricity transmission works. The Planning Statement is anchored in UK and Scottish legislation and policy frameworks, including National Planning Framework 4 (NPF4) (Scottish Government, 2023a), the UK Marine Policy Statement (HM Government, 2011), Scotland's National Marine Plan (Scottish Government, 2015), the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), and the Draft Updated Sectoral Marine Plan (Scottish Government 2025a).

1.3.1.4 This Planning Statement provides a summary of the conclusions found within the relevant EIA Report chapters and other supporting documents and provides a detailed assessment of compliance against the relevant policies detailed in the above documents. The key outcomes of this Planning Statement include:

- providing supporting information regarding delivery, specifically in respect of the proposed offshore infrastructure;
- demonstrating alignment of the Project, and specifically the proposed offshore infrastructure, with national and regional policy objectives for renewable energy and marine planning;
- summarising key conclusions from the EIA Report and supporting documents with respect to the proposed offshore infrastructure, including embedded mitigation measures and Project commitments; and
- providing a clear rationale for the approval of all required offshore consents for the Project, including the anticipated benefits, mitigation of impacts, and delivery of statutory requirements.

1.3.1.5 A separate Onshore Planning Statement is provided to Aberdeenshire Council in respect of proposed onshore development and, as such, the onshore infrastructure and components will not be considered in this Planning Statement.

1.3.1.6 The Planning Statement is set out as follows:

- **Section 1: Introduction**;
- **Section 2: Site and Project Description**;
- **Section 3: The Need for and Benefits of the Project**;
- **Section 4: Consultation and Engagement**;
- **Section 5: Legislation and Policy Context**;
- **Section 6: Planning Assessment**;
- **Section 7: Planning Balance and Conclusions**;
- **Section 8: References**; and
- **Section 9: Glossary of Terms and Abbreviations**.

1.4 Overview of consenting applications

1.4.1.1 The Marine and Coastal Access Act 2009 and the Marine (Scotland) Act 2010 have a landward jurisdictional limit of MHWS. Since marine licencing covers the marine area up to MHWS and terrestrial planning control extends down to Mean Low Water Springs (MLWS), there is an overlap of consenting regimes in the intertidal zone.

1.4.1.2 The intertidal zone is defined as the area between MLWS and MHWS. The term 'offshore' refers to environmental features located on the seaward side of MHWS and 'onshore' refers to environmental features on the landward side of MLWS. It is acknowledged that this approach creates an area of overlap, i.e. the 'intertidal' area between MLWS and MHWS. This is considered appropriate given the overlap between the respective consenting regimes. Additional detail on the relevant consenting regimes and legislative and policy context is set out within **Volume 1, Chapter 2: Legislative and Policy Context** of the **EIA Report**.

1.4.1.3 The components of the Project located seaward of MHWS are subject to a suite of consent applications submitted to the MD-LOT, for processing on behalf of the Scottish Ministers. As outlined in **Section 2.3**, these applications are:

- offshore wind farm generation infrastructure within the NE7 OAA: application for electricity generation consent under s.36 of the Electricity Act 1989 and associated application for construction and operational activities under the Marine and Coastal Access Act 2009; and
- offshore transmission infrastructure: multiple applications under both the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009 for proposed transmission infrastructure located within and outwith 12nm of shore respectively.

1.4.1.4 All onshore infrastructure located above MLWS requires to be consented under the Town and Country Planning (Scotland) Act 1997 through an application for Planning Permission in Principle (PPiP) which is submitted to the relevant local planning authority, Aberdeenshire Council, in tandem with the submission of offshore consenting applications. A whole project EIA Report has been prepared to support all of the consent applications.

1.4.2 Pre-application advice

1.4.2.1 The Applicant has engaged with MD-LOT through regular quarterly Project update meetings since May 2022. A representative from NatureScot has also been present at the majority of these quarterly meetings. The Project was the first ScotWind development to hold a structured EIA Scoping Workshop with MD-LOT which took place on 29th and 30th September 2022.

1.4.2.2 The full schedule of engagement with MD-LOT is outlined in **Table 1.1**.

1.4.2.3 The Pre-Application Advice has been wide-ranging. It has included the provision of advice relating to (but not limited to) the following:

- Marine survey activities including survey strategies, data validity, and lost objects.
- The approach to Scoping.
- The approach to the EIA Report as single submission covering the Project both onshore and offshore.
- The approach to Habitat Regulations Assessment (HRA) Screening and the Report to Inform Appropriate Assessment.
- The approach to the Cumulative Effects Assessment.
- The approach to marine licensing including Project phasing.
- Project design evolution and the design envelope.
- New guidance, research and policy updates for consideration by the Project.
- Stakeholder consultation and engagement requirements.
- Application submission management expectations and processes.

Table 1.1 Engagement with MD-LOT

Year	Date	Summary of discussions with MD-LOT
2022	July	• Project advancing site investigations, with offshore and onshore surveys underway. Aerial bird and marine mammal monitoring continues through April 2023. • Grid connection for 1.5GW confirmed at Peterhead via Holistic Network Design (HND).
	November	• Environmental and geotechnical surveys ongoing through 2023. • MoUs in place with key ports; active stakeholder engagement including MD-LOT, NatureScot, and others.
2023	March	• Scoping Report submitted; HRA Screening nearing completion. • Export Cable Corridor (ECC) survey prepared; Crown Estate Scotland (CES) approval pending. Geotechnical licence under consultation. • Strategic Compensation Framework in progress; ongoing coordination with NatureScot and fisheries.
	June	• Surveys on track; Scoping Opinion received; HRA Screening and Nature Positive Strategy underway.

Year	Date	Summary of discussions with MD-LOT
		• Marine Scotland now Marine Directorate; updated licensing timelines and cumulative effects guidance; ScotMER research advancing.
	September	• Key environmental and geotechnical surveys completed or ongoing. • Active stakeholder engagement including public consultations and coordination with MD-LOT, NatureScot, and others.
2024	January	• MetOcean and ECC surveys ongoing; further vessel traffic surveys planned for summer and winter 2024. • Continued engagement with MD-LOT, NatureScot, and fisheries groups; supply chain event held in Nov 2023.
	March	• The Project plans phased construction; no new surveys in 2024, metocean campaign concludes October. • Active coordination with MD-LOT, NatureScot, and fisheries groups; ongoing discussions on grid connection, ornithology, and cumulative effects.
	June	• MarramWind on track for Q4 2025 consent submission. • Cumulative impact assessments aligned to Group 1 data. • NatureScot clarified expectations for ornithology and marine mammal assessments.
	September	• Offshore surveys progressing. • Ongoing engagement with MD-LOT, NatureScot, and Ministry of Defence (MOD); project phasing influenced by grid and supply chain.
	December	• MarramWind surveys complete; stakeholder engagement ongoing, and grid connection expected Q1 2026. • MD-LOT shared updates on strategic compensation, licensing reforms, and ScotMER research.
2025	March	• MarramWind's consent submission scheduled for December 2025. • MD-LOT shared updates on strategic compensation, licensing reforms, and Cumulative Effects Framework (CEF) progress. • NatureScot provided updated guidance and encouraged early engagement.
	June	• MarramWind's final statutory consultations scheduled. • NatureScot requested clarity on phasing and ornithology modelling in EIA.
	July	• Pre-Submission Clarification Meeting • EIA key chapters under review. • Ongoing coordination on air gap and ornithology.
	September	• MarramWind on track for consent submission by 10 December 2025. • MD-LOT and NatureScot shared updates on licensing, strategic compensation, and guidance; technical documents are under review, and NatureScot requested simultaneous access to the EIA Report.
	December	• Final meeting prior to consent application submission.

1.5 The Requirement for an Environmental Impact Assessment

1.5.1.1 EIA is a process for identifying and evaluating the potential significant effects (adverse or beneficial) of a proposed development to inform consent decisions. The EIA enables decision-makers, statutory consultees, other stakeholders, and the public to understand potential effects and the scope for avoiding, preventing, reducing, and offsetting them, before determining whether to grant consent for the development.

1.5.1.2 The following EIA regulations have informed the accompanying EIA Report:

- The Electricity Works (EIA) (Scotland) Regulations 2017;
- The Marine Works (EIA) (Scotland) Regulations 2017;
- The Marine Works (EIA) Regulations 2007 (applies to applications that require an EIA for a marine licence from 12 – 200nm); and
- The Town and Country Planning (EIA) (Scotland) Regulations 2017.

1.5.1.3 The accompanying EIA therefore supports the determination of the marine licences and s.36 consent for the Project. In particular, the EIA Report provides an assessment of the likely significant effects associated with the Project during its construction, operation & maintenance (O&M), and decommissioning stages. This Planning Statement includes cross-references to the corresponding EIA Report chapters where detailed assessments are documented as required, ensuring clarity and ease of navigation for the determining authority.

1.5.1.4 The scope of the EIA was informed by a formal Scoping Opinion issued by MD-LOT on 12 May 2023 (Scottish Ministers, 2023c) and Aberdeenshire Council on 22 March 2023 (Aberdeenshire Council, 2023).

1.6 Land Rights

1.6.1.1 MarramWind Ltd intends to secure the Project's necessary land rights through voluntary agreements with all affected landowners and occupiers. MarramWind is committed to open engagement with affected parties in negotiating these agreements. The Project recognises the need for collaboration between developers in the Peterhead area and will continue to pursue this as required. In addition, the Project has secured a Generation Licence from Ofgem and as such will have the ability to launch a Compulsory Purchase Order (CPO) if it is deemed necessary and appropriate.

2. Site and Project Description

2.1 Site location and surroundings

2.1.1.1 The overall Red Line Boundary for the Project that is used to inform the accompanying EIA Report (illustrated in **Volume 2, Figure 1.1: Red Line Boundary** of the **EIA Report**) is defined as the area within which the Project and associated infrastructure will be located, including temporary construction activities, O&M work areas and decommissioning activities. This includes all Project components, both onshore and offshore.

2.1.1.2 In line with the jurisdictional limit of the offshore consenting regimes described in **Section 1.3**, the Offshore Red Line Boundary (illustrated in **Volume 2, Figure 4.2: Offshore Red Line Boundary** of the **EIA Report**) includes:

- the NE7 OAA; and
- the offshore export cable corridor up to MHWS.

2.1.1.3 **Table 2.1** provides the key characteristics of the area enclosed by the Offshore Red Line Boundary.

Table 2.1 Offshore Red Line Boundary characteristics

Parameters	Values
OAA surface area	684km^2
Water depth range in OAA	87.8 to 133.7 metre (m)
Closest distance to shore of OAA	75km
Farthest distance to shore of OAA	110km
Offshore development surface area (excluding OAA)	575km^2
Total offshore development surface area (including OAA and offshore export cable corridor)	1,259km^2

2.2 Design evolution and site selection

2.2.1.1 The boundary of NE7 was determined via the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) in 2020 and secured as the OAA for the Project by the Applicant via ScotWind Leasing in 2022. The site selection process was framed between this offshore location and the onshore grid connection point, with all routing and optioneering taking place between these two defined locations.

2.2.1.2 As detailed in **Volume 1, Chapter 3: Site Selection and Consideration of Alternatives** of the **EIA Report** of the accompanying EIA Report, a design process was undertaken to determine the most suitable locations and routings for Project infrastructure. The chapter summarises the site selection process, describes the alternatives considered, and the reasons for choosing the selected option(s), before explaining the outcomes of the process that have led to the refinement of the Project.

2.2.1.3 The Project's design evolution was systematic, analytical, impartial, consultative, and iterative. This approach allowed environmental and planning policy constraints, as well as technical and economic considerations, to be addressed.

2.2.1.4 This process was iterative and enabled the development of environmental measures that have been embedded directly into the design of the Project. These are referred to as 'embedded environmental measures' (discussed in further detail in **Volume 1, Chapter 5: Approach to the EIA** of the **EIA Report** and set out within **Volume 3 Appendix 5.2: Commitments Register** of the **EIA Report**).

NE7

2.2.1.5 The Project occupies the OAA as identified within the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) as 'NE7', with its location, boundary, and grid connection date predetermined by the Sectoral Marine Plan and the Option to Lease Agreement with Crown Estate Scotland.

2.2.1.6 NE7 was formally identified as a Plan Option in the final Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), adopted by the Scottish Ministers, and subsequently offered as an OAA through the ScotWind leasing round. This followed a multi-year design process involving constraints mapping, stakeholder engagement, and public consultation. It is important to note that the spatial extent of Plan Option NE7 was reduced following assessment of and consultation feedback on the Draft Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2019) specifically to avoid the areas of highest existing fishing activity highlighted by the fishing sector. The plan was then adopted by the Scottish Ministers and the ScotWind leasing round proceeded on this basis.

2.2.1.7 There are numerous other wind farms under development in the wider area from both the ScotWind leasing process and the separate Innovation and Targeted Oil and Gas (INTOG) leasing process, which provides development areas for demonstrator and decarbonisation projects.

2.2.1.8 In the early stages of the ScotWind Leasing Round, independent studies were undertaken to evaluate and compare the Plan Options. These studies evaluated the power output potential of the Plan Options, their suitability for floating unit versus fixed base foundation technology, and the environmental characteristics of each site. Of particular interest were those characteristics that represented an environmental sensitivity or a technical challenge that could have potential to constrain future development.

2.2.1.9 A shortlist of Plan Options was established and NE7 found to perform well against the site selection criteria that were analysed. NE7 performed particularly well in relation to physical characteristics such as having water depths suitable for floating units, adequate area for a large power output capacity, good ground conditions with low seabed mobility and therefore a reduced need for scour protection, good metocean conditions, and a reduced risk to ornithology due to the distance from coastal designations.

2.2.1.10 NE7 was subsequently taken forward by the Applicant as MarramWind Offshore Wind Farm. This enabled the selection stages for the wider offshore infrastructure to commence. Further detail on the design development process for NE7 is provided in Section 3.6 of **Volume 1, Chapter 3: Site Selection and Consideration of Alternatives** of the **EIA Report**.

Cable route

2.2.1.11 Section 3.7 of **Volume 1, Chapter 3: Site Selection and Consideration of Alternatives** of the **EIA Report** describes the site selection process for the offshore export cable corridor and subsequent refinements to the offshore export cable route.

2.2.1.12 With the OAA secured, selection stage 1 for the offshore export cable corridor needed to cover a broad search area between the OAA and the Aberdeenshire coast. This area needed to be sufficiently wide to accommodate potential onshore connections at both New Deer and Peterhead as a grid connection at either location was being considered at that time. The boundary of the offshore export cable corridor search area was therefore initially designed to provide adequate flexibility for connecting the OAA to the grid connection point(s), and to allow sufficient space for export cable route optioneering to avoid and / or circumnavigate areas of environmental sensitivity or construction risk along the route. It was also informed by the ECC general routing and search area for landfalls being primarily driven by the outputs of early National Grid National Electricity System Operator (NESO) engagement and subsequent HND and HND Follow-up Exercise (FUE) / Beyond 2030 documentation, which ultimately directed the full 3GW Project to connect within the vicinity of Peterhead.

2.2.1.13 A geological and environmental constraints analysis was undertaken to generate route corridors between the OAA boundary and a range of early landfall options with the resultant route options analysed further by marine cable installation engineers to determine a preferred route. The analysis included the following cable installation specifications:

- a cable route should have a limited number of course alterations, separated by straight sections;
- course alterations should be of sufficiently large radius so as to not limit the cable installation tools. a course alteration radius of 1000m was assumed for the purpose of cable corridor definition;
- course alterations should be sufficiently far from crossings or other obstacles to avoid the cable being dragged or moved at the point of crossing or obstacle;
- the cable route should be perpendicular / sub-perpendicular to pipelines and cables at crossings, with an absolute minimum crossing angle of 45° but preferably closer to 90°;
- landfall approach should be perpendicular / sub-perpendicular to the coastline;
- prioritisation of a combined corridor for part of the route should be assumed, even if this is at the expense of total optimisation of every route (i.e. for corridor survey optimisation);
- proximity to other infrastructure, especially in the vicinity of course alterations, should be limited; and
- some constraints may not increase with additional route length in a constrained area and therefore if a constraint cannot be avoided it may be preferable to route directly through an area, rather than extending route length around that area.

2.2.1.14 Stakeholder engagement, offshore reconnaissance surveys and marine surveys were subsequently undertaken to determine the least constrained cable route options between the OAA and potential landfall zones along the Aberdeenshire coastline.

2.2.1.15 As detailed in **Volume 1, Chapter 3: Site Selection and Consideration of Alternatives** and **Volume 1, Chapter 4: Project Description** of the **EIA Report**, two landfall locations have been considered throughout the EIA Report and associated applications. The inclusion of multiple landfall options within the consenting applications is intended to provide the Project with the required level of flexibility with regard to securing sufficient space, in

appropriate locations, to construct the landfall(s) and associated onshore and offshore export cables necessary to facilitate the connection of a 3GW Project, whilst ensuring cumulative environmental impacts are kept to a minimum.

2.2.1.16 The following landfall options form part of the Project and have been assessed:

- Lunderton – all offshore export cable cables would make landfall at Lunderton, based on the following scenarios:
  - all export cables make landfall at Lunderton North; or
  - all export cables would make landfall at a combination of Lunderton North and Lunderton South.
- Scotstown and Lunderton – export cables would make landfall at a combination of Lunderton (North and / or South) and Scotstown.

2.2.1.17 Whilst two landfall options have been assessed, the Project would seek to use a single, best landfall option which will be determined post-consent.

2.2.1.18 Both landfall locations are included in each transmission marine licence, alongside a description of the relevant Project phase when each marine licence is expected to be delivered. It is anticipated that there will be three cable phases, which will be consented via separate marine licences. The approach to conditions related to the marine licences is set out in **Section 2.7**.

Grid Connection

2.2.1.19 As noted above, the Project will have a grid connection capacity of 3GW. The NESO Beyond 2030 Report (NESO, 2024) identified the location for the full 3GW connection as being within the vicinity of Peterhead, subject to detailed siting and design work to be undertaken by Scottish and Southern Electricity Networks (SSEN) as the Transmission Operator. SSEN subsequently identified the Project's connection point as the Netherton Hub at Longside near Peterhead, which was granted PPiP by Aberdeenshire Council in August 2025.

2.2.1.20 Given the scale of the Project and the extensive onshore and offshore enabling works required to provide the 3GW capacity, the NESO and SSEN have proposed a staged connection with access to grid capacity to be made available in three phases. The grid capacity availability is dependent on the delivery timeline for enabling works and therefore earliest in service dates that could be possible for the Project.

2.2.1.21 NESO's HND, HND FUE and Beyond 2030 publications form the strategic context for integrating offshore wind into the energy system. The HND FUE builds upon the original HND's coordinated vision for offshore transmission infrastructure to support the UK's 2030 target of 50GW offshore wind capacity, by refining and expanding on the design to accommodate additional projects, updated data and stakeholder feedback.

2.2.1.22 There are other factors that may influence the final design and phasing requirements, such as route to market and supply chain considerations. Further detail on these factors is provided in **Volume 1, Chapter 4: Project Description** of the **EIA Report**.

2.2.1.23 The construction of the Project would consequently align with the energisation of the Project over three phases. Each phase of the Project will be operational for up to 35 years from completion of installation and commissioning of offshore wind turbine generators (WTGs).

Mitigation hierarchy

2.2.1.24 As part of the Project's design process and in response to stakeholder consultation, a suite of embedded environmental measures has been adopted to minimise potential impacts. These measures, established at the Scoping stage and documented in the Commitments Register (see **Volume 3, Appendix 5.2** of the **EIA Report**), have been iteratively incorporated into the EIA and are integral to the Project's design and sectoral best practice. Reflecting the scale of the Project and the need for detailed design decisions to be taken at a later date when technological and supply chain aspects can reliably be confirmed, many of the commitments are addressed within a suite of outline plans which support the consenting applications. Further definition and detail will be generated in the detailed design phase following any consents granted for the Project.

2.2.1.25 In line with EIA Regulations and industry best practice, the mitigation hierarchy has been applied to the design and assessment of the Project. This hierarchy prioritises measures in the following order: avoid (where possible), prevent, reduce, and offset residual impacts. This approach ensures that the most effective and sustainable solutions are considered first.

2.2.1.26 The embedded environmental measures include proposed avoidance measures, which have been informed by the design evolution process (see **Chapter 3: Site Selection and Alternatives** of the **EIA Report**), and sectoral best practice commitments. Measures include, for example, route selection to avoid sensitive habitats, cable burial to reduce seabed disturbance, and operational controls to prevent or reduce impacts. Full details are presented in **Volume 3, Appendix 5.2** of the **EIA Report** and have been considered throughout the EIA.

2.2.1.27 The adoption and implementation of these measures directly supports the Project's compliance with regulatory requirements and will be secured through consent conditions, ensuring ongoing monitoring and reporting to the determining authorities.

2.3 Project description

2.3.1.1 The offshore elements of the Project, which refer to works seaward of MHWS, are set out in **Table 2.2** below, and detailed within **Volume 1, Chapter 4: Project Description.**

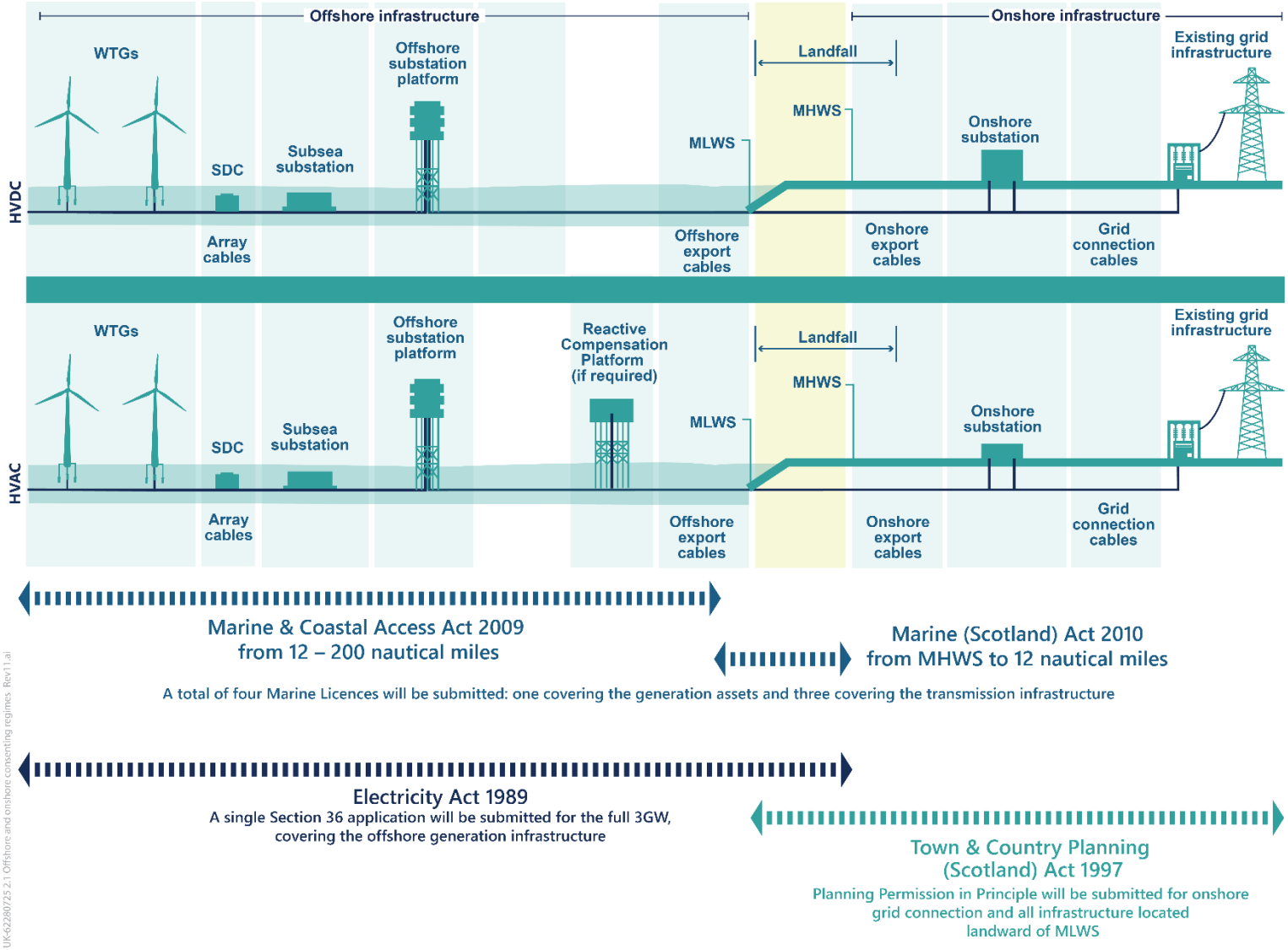
Table 2.2 Proposed offshore infrastructure

Proposed Infrastructure	Infrastructure Detail	Generation or Transmission Consent
Wind turbine generators (WTGs), including floating units (platforms and station keeping system);	126 to 225 WTGs within the OAA, with maximum turbine power output of 14 megawatt (MW) and 25MW, and a maximum hub height of 182m to 142m respectively. Floating units including semi-submersible, barge and tension-leg platform options. Up to 8 mooring lines (catenary, semi-taut, taut-line, and vertical tension mooring options). Up to 8 anchors per floating unit (drag	Generation

Proposed Infrastructure	Infrastructure Detail	Generation or Transmission Consent
	embedment, driven pile, and suction anchor options).	
Array cables;	126 to 225 array cables within the OAA, with an overall length of 680km to 530km respectively.	Generation
Subsea distribution centres (SDC);	Up to 45 SDCs within the OAA, secured to the seabed by suction caisson / skirt or gravity base foundations.	Generation
Offshore substations and subsea substations;	Up to four offshore substations within the OAA, secured to the seabed by driven piles or suction caisson foundations. Up to four subsea substations within the OAA, secured to the seabed by suction caisson / skirt or gravity base foundations.	Transmission
Reactive compensation platform(s) (if required); and	Up to two RCPs located along the export cable corridor, secured to the seabed by jacket foundations using driven piles or suction caisson foundations.	Transmission
Offshore export cables to connect the wind farm area to the landfall(s).	Five cable trenches, each with a width of 30m and a length of 130km to 140km depending on the offshore substation and landfall locations. Target burial of the export cables of 100%, to a target burial depth of 1m to 2m.	Transmission

2.3.1.2 The Project requires both High Voltage Alternating Current (HVAC) and High Voltage Direct Current (HVDC) electrical transmission technology. These involve some differences in the necessary infrastructure. **Plate 2.1** presents the key components of the offshore and onshore components of the Project. It should be noted that the offshore substation will be included within the Transmission Marine Licence application and does not fall under the s.36 consent. Whilst a brief description of the key components has been outlined below, **Volume 1, Chapter 4: Project Description** of the **EIA Report** contains a thorough explanation of the proposed offshore infrastructure of the Project.

Plate 2.1 Offshore and onshore consenting regimes



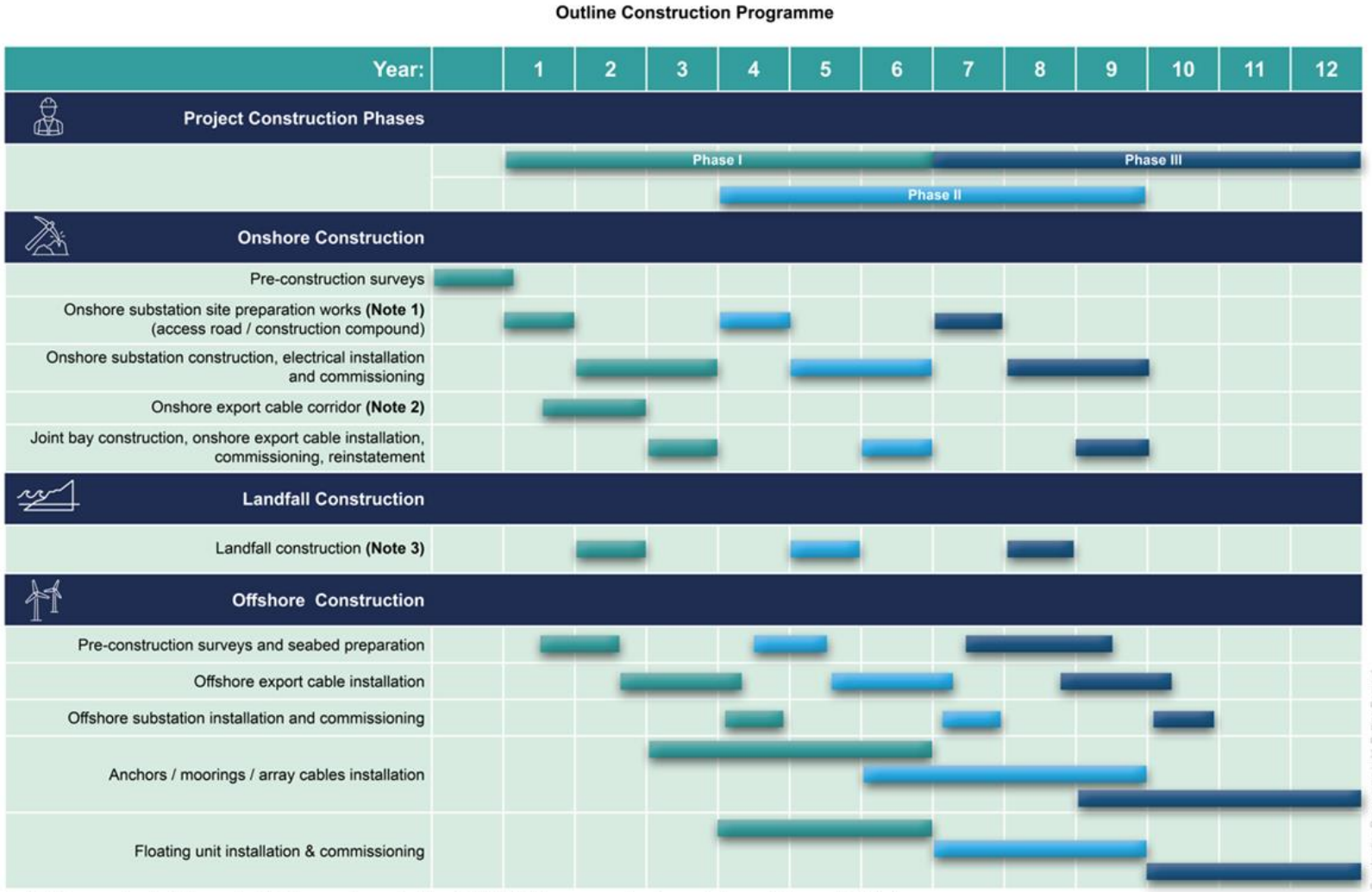
2.3.2 Construction

2.3.2.1 An indicative construction programme for the Project is presented in **Plate 2.2** The programme illustrates the anticipated duration of the main construction / installation activities by infrastructure component. The Project will be delivered in phases, which are reflected in the indicative construction programme. It is anticipated that construction of the Project would commence in 2030.

2.3.2.2 The overall duration of construction of the offshore infrastructure is anticipated to be up to 12 years. This will be subject to the final grid connection date, supply chain discussions and further site surveys (pre-consent). A shorter period within the 12 years is expected for construction of the onshore infrastructure; in the range of up to 9 years.

2.3.2.3 As outlined in the accompanying **Safety Zone Statement** submitted with this application, the Applicant intends to submit two Safety Zone Applications covering the Project's construction and decommissioning phases. Further details are provided in **paragraph 2.6.2**.

Plate 2.2 Indicative construction programme



Note 1: Permanent roads built as part of first phase onshore substation build. No further permanent roads required as part of second & third phases.
Note 2: Includes site preparation works (access / haul roads, construction compounds), cable trenching, horizontal directional drilling works and duct installation for all Project phases.
Note 3: Includes site preparation works (access road / construction compound), transition joint bay construction, horizontal directional drilling works and associated duct installation.

2.3.3 Construction timing

2.3.3.1 As secured in **Volume 4: Outline Environmental Management Plan (Outline EMP)** of the **EIA Report** the worst-case expected working hours offshore would be 24 hours a day, subject to relevant marine law and watchkeeping. The core working hours for the Project's onshore construction works in respect of Horizontal Directional Drilling (HDD) and cable works nearshore and at landfall, are as follows:

- 08:00 to 18:00 hours Monday to Friday; and
- 08:00 to 13:00 hours on Saturday.

2.3.3.2 Prior to, and following, the core working hours Monday to Friday, a 'shoulder hour' for mobilisation and shut down will be applied (07:00 to 08:00 and 18:00 to 19:00) for which restrictions are described further in **Volume 4: Outline Construction Environmental Management Plan** of the **EIA Report**. No activity outside of these hours, including Sundays, public holidays or bank holidays will take place apart from under the following circumstances:

- where continuous periods (up to 24-hours, 7 days per week) of construction work are required for HDD;
- for other works requiring extended working hours such as concrete pouring which will require the relevant planning authority to be notified at least 72 hours in advance;
- for the delivery of abnormal loads to the connection works, which may cause congestion on the local road network, where the relevant highway authority has been notified prior to such works 72 hours in advance;
- where works are being carried out on the foreshore; and
- as otherwise agreed in writing with the relevant planning authority.

2.3.4 Operation and maintenance

2.3.4.1 Given the scale of the Project, a phased approach to the installation and energisation of the WTGs is proposed. It is anticipated that the first phase of the Project would become fully operational in 2037 following commissioning of the WTGs for phase 1. It is anticipated the second phase of the Project would become fully operational in 2040 and the third phase in 2043. The operational lifetime of the Project for each phase is expected to be around 35 years. Additional detail on the phased approach to be adopted is set out in **Volume 1, Chapter 4: Project Description** of the **EIA Report**.

2.3.4.2 O&M activities will be categorised as either scheduled or unscheduled, with frequencies ranging from daily remote monitoring to occasional component replacements. While the developer will oversee O&M for the generating assets, transmission infrastructure such as offshore substations and export cables will be transferred to an Offshore Transmission Operator (OFTO) in line with the Electricity Act 1989.

2.3.4.3 The Project is committed to ensuring the long-term reliability and performance of the wind farm through a comprehensive and well-planned O&M strategy. The strategy will be designed to minimise environmental impact while maintaining operational efficiency. A comprehensive O&M strategy that includes regular inspections, safety protocols, and environmental management plans will be adopted.

2.3.4.4 A monitoring, inspection and maintenance plan will be put in place to ensure the integrity of all offshore infrastructure associated with the Project. Maintenance requirements will

depend on the infrastructure used, depending on the type of wind turbine, floating platforms, electrical transmission infrastructure and final layout of the wind farm.

2.3.4.5 Additional detail on the O&M stage, commitments and activities has been included in **Volume 1, Chapter 4: Project Description** of the **EIA Report**.

2.3.5 Decommissioning

2.3.5.1 The approach to decommissioning of the offshore infrastructure will be completed in line with any relevant guidance and legislation at the time of decommissioning. It is however expected that all infrastructure above the seabed will be removed. Any infrastructure below the seabed will be assessed to determine if less impactful to remove or leave in position.

2.3.5.2 A Decommissioning Programme will be developed post consent but prior to construction. It will be updated during the operational phase of the Project to account for any changes to industry best practice, relevant legislation, guidance and policy, or developments in technology.

2.3.5.3 Once decommissioned, all components will be reused or recycled where possible. Additional detail on the decommissioning of WTGs, floating units, array cables, subsea distribution centres, subsea substations, offshore substations, reactive compensation platforms, offshore export cables, and ports is included in **Volume 1, Chapter 4: Project Description** of the **EIA Report**.

2.3.6 Project design envelope

2.3.6.1 The description of the Project for the EIA is indicative and a ‘design envelope’ approach, also known as the ‘Rochdale Envelope’, has been adopted. The Applicant has applied the Rochdale Envelope principle to the accompanying EIA, which provides the reasonable worst-case parameters or scenario that will encompass the flexibility required for relevant Project infrastructure.

2.4 Co-existence

2.4.1.1 The Applicant acknowledges that the marine space in and around the Offshore Red Line Boundary is occupied and utilised by a range of other marine users and activities. This includes, but is not limited to: commercial fishing; freight shipping, passenger ferry services and recreational vessel activity; oil and gas assets including platforms, wellheads, and pipelines; subsea telecommunication and inter-connector cables; aviation routes; defence activities; ecological designations; and other offshore wind farm developments.

2.4.1.2 The co-existence of the Project with these existing marine activities is central to its success and to the safety of all personnel and third-party assets at sea. The Project has therefore been designed with other marine users in mind (see **Volume 1, Chapter 3: Site Selection and Consideration of Alternatives,** and **Volume 1, Chapter 18: Infrastructure and Other Marine Users** of the **EIA Report**).

2.4.1.3 Project design decisions that have taken account of co-existence requirements include export cable routing to avoid areas used by inshore and static gear fisheries around Peterhead, and the avoidance of the Golden Eagle to Claymore oil export pipeline that intersects the OAA. The Project has undertaken extensive stakeholder engagement with representatives from all the noted sectors to understand their activities and ensure their interests and concerns are factored into Project design decisions.

2.5 Delivery

2.5.1 Infrastructure covered by each consenting application

2.5.1.1 The Applicant seeks s.36 consent under the Electricity Act 1989 for the full 3GW, covering the offshore generating station and array cabling alongside all offshore infrastructure elements proposed as part of the Project as noted in **Section 1.2**.

2.5.1.2 Three sets of transmission marine licences and one generation marine licence will be prepared for the relevant licensable activities associated with the Project. These are referred to in this document as ML1 to ML4, as defined below. Each marine licence application will cover both the Marine and Coastal Access Act 2009 and the Marine (Scotland) Act 2010 insofar as relevant, as agreed between the Applicant and MD-LOT during a Quarterly Project Update meeting on 18 September 2025.

2.5.1.3 Whilst all marine licence applications will be submitted to MD-LOT concurrently, the discharge of the associated conditions on individual licences is expected to occur in stages, reflecting the phased nature of the Project.

2.5.1.4 Supply chain and market conditions will impact upon technology selection. Some aspects of the consents and marine licence applications for both generation and transmission infrastructure may therefore be subject to variation and refinement at a later stage, potentially up to 10 to 12 years after the initial submission of the marine licence applications. Any consents and marine licences granted for the Project at the present time will however provide an important framework to underpin subsequent detailed design, supply chain and financing decisions to allow the Project to progress.

2.5.1.5 The Project infrastructure covered by the four marine licence applications is set out in **Table 2.3**, below.

Table 2.3 Project infrastructure per marine licence

Marine Licence	Offshore infrastructure
ML1: for full 3GW generation assets, Phases 1 - 3	• WTGs with floating units, anchors and moorings; • array cabling; and • subsea distribution centres.
ML2: for transmission assets, Phase 1	• 1x HVAC offshore substation; • up to 2x HVAC export cables; • up to 2x export cable trenches; and • up to 2x landfall options.
ML3: for transmission assets, Phase 2	• up to 2x HVAC or 1x HVDC offshore substations; • up to 2x reactive compensation platforms within the export cable corridor;

Marine Licence	Offshore infrastructure
	• up to 2x HVAC or HVDC export cables; • up to 2x export cable trenches; and • up to 2x landfall options.
ML4: for transmission assets, Phase 3	• 1x HVDC offshore substation • 1x HVDC export cables; • 1x export cable trench; and • up to 2x landfall options.

2.6 Project implementation

2.6.1 Implementation plans

2.6.1.1 Various offshore implementation plans have been prepared to accompany the offshore applications for consent. These plans demonstrate how environmental commitments will be delivered during construction and operation of the Project and include the following:

- **Outline Construction Method Statement**;
- **Outline Piling Strategy**;
- **Outline Cable Plan**;
- **Outline Scour Protection Management Plan**;
- **Outline Project Environmental Monitoring Programme**;
- **Outline Marine Mammal Mitigation Protocol**;
- **Outline Vessel Management and Navigational Safety Plan**; and
- **Outline Lighting and Marking Plan**.

2.6.1.2 In addition to the above, and aligning with MD-LOT guidance (Scottish Government, 2025b) which states that from 01 April 2025 additional plans will be required to accompany offshore applications for consent, the following implementation plans have been prepared:

- **Outline Fisheries Mitigation, Monitoring, and Communication Plan**;
- **Outline Written Scheme of Investigation (Offshore)**;
- **Outline Environmental Management Plan** (including: **Appendix 1: Outline Marine Pollution Contingency Plan**); and
- **Outline Invasive Non-Native Species Management Plan**.

2.6.1.3 A single set of these implementation plans is submitted to support all of the offshore consent and licencing applications, rather than a plan being specific to an individual application.

2.6.1.4 Subsequent updates were issued in August, September, and October 2025, including new guidance on:

- s.36 consent applications;
- applicant responsibilities;
- accidental deposit of objects at sea;
- Unexploded Ordnance (UXO) clearance; and
- Seabed Obstruction Mitigation Plans.

2.6.1.5 The following additional plans will be prepared post-consent:

- **Outline Development Specification and Layout Plan**;
- **Outline Offshore Operational Maintenance Plan**; and
- **Outline Seabed Obstruction Mitigation Plans**.

2.6.1.6 As part of the discharge of conditions, finalised implementation plans will be prepared providing detail in addition to the outline plans noted above. It is anticipated that the preparation of these finalised implementation plans may be secured under conditions that Scottish Ministers may attach to the s.36 consent or relevant marine licence(s) as appropriate. These conditions will be discharged upon submission of the finalised plans to MD-LOT.

2.6.2 Safety zones

2.6.2.1 The Applicant intends to submit two Safety Zone Applications covering the Project's construction and decommissioning stages. During construction, it is anticipated that rolling safety zones will be employed around active construction works. These would move from location to location as works progress with the Offshore Red Line Boundary. This approach facilitates continued access to the waters within the Offshore Red Line Boundary for commercial fishing and other transiting vessels, with exclusions only in place around active works to ensure navigational safety in those locations. As set out in the accompanying **Safety Zone Statement**, the Project seeks consent for the following offshore construction works:

- pre-construction surveys and seabed preparation activities;
- anchor and mooring line installation;
- WTG floating unit and wind turbine preparatory works;
- floating wind turbine towing to site;
- array cable and SDC installation;
- offshore platform foundation installation;
- offshore platform topside installation;
- offshore subsea substations;
- export cable installation; and
- WTG commissioning.

2.6.2.2 Following consent application submission, and assuming that s.36 and marine licence consents are granted, an application will be made for the standard safety zones. The Applicant anticipates that an application for safety zones would be made to MD-LOT incorporating some or all of the following provisions, noting that safety zones will move with the floating units:

- construction stage – rolling 500m safety zones around active construction works and evidenced by the presence of a construction vessel;
- construction stage – 50m safety zones around partially or fully completed structures prior to the overall wind farm commissioning;
- O&M stage – a 500m safety zone around the location of major maintenance works; and
- decommissioning stage – no safety zones currently proposed; a separate application would be made prior to decommissioning where considered necessary.

2.6.2.3 A Safety Zone Statement has been prepared to accompany this submission and provides details of the measures to be implemented during construction, operation and decommissioning. The formal Safety Zone Application will be sought post-consent when additional details about the technologies and construction practices are known.

2.6.2.4 Further details of the construction of the offshore elements of the Project are available within **Volume 1, Chapter 4: Project Description** of the **EIA Report**.

2.6.3 Ports strategy

Construction ports

2.6.3.1 The Project will endeavour to use Scottish and UK ports during the construction stage, with an indicative shortlist of ports considered for the Project identified in **Table 2.4** This is based on the main construction activities that are envisaged to be required under the current Project requirements and port capabilities.

2.6.3.2 The shortlist of ports is not definitive and does not preclude the potential consideration of other suitable locations at the time of final port selection. Final port selection will be dependent upon, and only take place following:

- the grant of consent for the Project;
- confirmation of route to market including final investment decision; and
- on the findings of further technical and commercial studies.

2.6.3.3 Additional activities may occur at other ports and locations further afield. The global nature of supply chains means it is not possible to identify or assess these at this relatively early stage.

Table 2.4 Potential construction ports

Construction Activity	Potential ports
Construction / Fabrication	
Station keeping system for example, anchors/suction piles/driven piles/mooring system	Inverness and Cromarty Firth Green Freeport, including Nigg, Invergordon, Ardersier, Inverness; Forth Green Freeport area plus Methil and Dundee, including Burntisland, Leith, Rosyth, Grangemouth plus Methil and Dundee; North East Scotland, including Aberdeen, Peterhead, Montrose; and England: Teesside Freeport area and Port of Tyne.
Array cables	Rosyth; Newcastle/Teesside; Gravesend; and Nigg.
Floating units Concrete semi-submersible	Ardersier; Kishorn; and Invergordon.
Floating units Steel semi / tension leg platform. Assembly of steel components.	Rosyth; Nigg; Methil; and Invergordon.
Subsea substations and SDCs	Invergordon; Nigg; Methil; Burntisland; Rosyth; and Teesside.
Integration	
Integration of floating units and WTGs	Inverness and Cromarty Firth Green Freeport, including Nigg, Invergordon or Ardersier; and Forth Green Freeport, including Burntisland and Leith.
Marshalling	
WTG / floating unit components to be marshalled near to integration port	Invergordon; Nigg; Ardersier; Inverness; Dundee; Methil; Montrose; Rosyth; Leith; and Aberdeen.

Construction Activity	Potential ports
Station keeping system	Peterhead; Aberdeen; Grangemouth; Leith; Montrose; and Dundee.

Operation and maintenance ports

2.6.3.4 The Applicant will also endeavour to use Scottish and UK ports during the O&M stage, with an indicative shortlist of O&M ports considered for the Project identified in **Table 2.5**. These are based on the main O&M activities that are envisaged to be required under the current Project requirements and port capabilities.

Table 2.5 Potential operation and maintenance ports

Operation and Maintenance Activity	Potential ports
General O&M for supply Service Operation Vessels / crew changes	Aberdeen; Fraserburgh; Peterhead; Montrose; Nigg; Cromarty; and Ardersier.
Major component replacement and other O&M that requires floating units / WTGs to be towed to port	Inverness and Cromarty Firth Green Freeport, including Nigg, Invergordon or Ardersier; Forth Green Freeport, including Burntisland and Leith; and Aberdeen.

Decommissioning ports

2.6.3.5 The Applicant will also endeavour to use Scottish and UK ports during the decommissioning stage with an indicative shortlist of ports considered for the decommissioning of the Project, identified in **Table 2.6**. These are based on the main decommissioning activities and envisaged to be required under the current Project requirements and port capabilities.

Table 2.6 Potential decommissioning ports

Decommissioning Activity	Potential ports
Decommissioning	Kishorn; Scapa; Teeside; Nigg; Ardersier; Invergordon; and Methil.

2.7 Approach to conditions

2.7.1.1 As described in **Section 1.2**, a phased approach to the installation and energisation of the Project is proposed. The Project's phasing, alongside the requirement to discharge conditions in their entirety, will need to shape the conditions applied to the consents and licences. Additional detail on the phased approach to be adopted is set out in **Volume 1, Chapter 4: Project Description** of the **EIA Report**.

2.7.1.2 The consents and licences being sought for the Project will be subject to conditions. For marine licences, conditions are imposed under Section 27 of the Marine (Scotland) Act 2010 (Scottish Government, 2010) and Section 69 of the Marine and Coastal Access Act 2009 (UK Government, 2009), as appropriate. For s.36 consent under the Electricity Act 1989 (UK Government,1989), the ability to impose conditions is provided by Section 36(5), with additional decision-making duties under Section 36B and Schedule 9. An application for a generation licence is being progressed. If granted, it is understood that there will be further duties on both the applicant and Scottish Ministers in relation to the exercise of those powers. It is expected that the conditions placed on the consent will ensure that the construction of the offshore infrastructure can proceed in a phased, controlled and deliverable manner.

2.7.1.3 The Applicant would welcome engagement with MD-LOT to discuss the relevant conditions. Given the phased nature of the Project and the requirement to discharge conditions in full, it is understood that condition wording will be drafted to reflect the proposed phased build-out. This approach will enable the Applicant to address relevant conditions in a manner that facilitates the delivery of each phase, without constraining the implementation of subsequent construction phases.

2.7.1.4 The Applicant requests that a condition for the submission and approval of a Phasing Plan, with express provision for this to be capable of being revised and re-submitted for re-approval in respect of later phases, is included on any s.36 consent and associated marine licence granted for the OAA. This would provide a hook for the discharge of detailed design and environmental conditions relating to development within the OAA on a phased basis. As each proposed transmission infrastructure phase is covered by a separate marine licence it is expected that each licence will include a full set of conditions. Some of the information and plans provided to discharge conditions on the transmission marine licence for the first phase of development (ML2) may, once approved, be updated or amended as necessary and re-submitted to discharge conditions on the transmission marine licences for later phases.

2.7.1.5 The Applicant appreciates that there is likely to be engagement between MD-LOT and Aberdeenshire Council as part of the planning process, given that Aberdeenshire Council is concurrently setting conditions for the PPiP application associated with the onshore

consents for the Project. Coordinated engagement will help ensure consistency across consenting regimes and support a more streamlined and effective approach to condition-setting.

2.7.1.6 Each marine licence will have a separate conditions list which will be addressed, depending upon the marine licence to which they apply.

2.7.1.7 The Applicant suggested key considerations for conditions to be considered for the s.36 consent and marine licence applications has been outlined in **Appendix A: Provisional Conditions List**. Careful consideration should be given to the phased build out of generation infrastructure under a single s.36 consent and associated marine licenses. In order to ensure the efficient design and discharge of these conditions, the Applicant would welcome early discussion with MD-LOT on the expectations of the structure and wording of proposed conditions.

3. The Need for and Benefits of the Project

3.1 Introduction

3.1.1.1 A summary of the key policy and legislation against which the Project has been developed, is outlined in **Volume 1, Chapter 2: Legislative and Policy Context** and **Volume 3, Appendix 2.1: Planning Policy Framework** of the **EIA Report**. This Section therefore focuses on the ways in which the Project responds to key climate change and energy legislative and policy drivers, setting out the policy context that justifies the need for the Project.

3.1.1.2 The proposed offshore infrastructure is fundamental to the Project's operation and the key generator of the benefits the Project can provide, that being clean renewable energy that enables Scotland and the UK to meets their electricity demands sustainably.

3.1.1.3 The Scottish Government's adopted and emerging Sectoral Marine Plan seek to contribute to the achievement of Scottish and UK energy and climate change policy objectives, which reiterates the value of offshore development, such as the Project, in addressing these targets. The identification of the NE7 OAA within the adopted Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) and its retention without amendment within the Draft Updated Sectoral Marine Plan (Scottish Government 2025a), as a sustainable area for the development of commercial scale offshore wind energy highlights the recognised national need for and the established suitability of this specific location for the Project within national policy.

3.1.1.4 At the international level, the legally binding Paris Agreement (United Nations Framework Convention on Climate Change, 2015) commits the UK to ambitious greenhouse gas (GHG) reductions, aiming to limit global warming to well below 2°C compared to pre-industrial global average temperature levels, with a preferred target of limiting global warming to 1.5°C. This ambition indicates the urgency of decarbonisation and climate change.

3.1.1.5 As discussed below, publications by the UK and Scottish Governments set out emission reduction targets and underline the need for the rapid deployment of offshore wind developments, such as MarramWind Offshore Wind Farm, across the UK.

3.1.1.6 In Scotland, the Climate Change Plan (Scottish Government, 2020b) and Climate Change (Emissions Reduction Targets) (Scotland) Act (Scottish Government, 2024) set a statutory target of net zero by 2045, with interim milestone reductions of 75% reduction by 2030 and 90% by 2024. The Scottish Government's proposed updated offshore wind ambition of deploying 40GW of new capacity, over and above the 2025 baseline level, by 2035 - 2040 further emphasises the need for large scale deployment such as the Project.

3.1.1.7 NPF4 prioritises development that addresses the global climate emergency and identifies strategic-scale renewables, expressly including offshore wind farms with installed capacities exceeding 50MW and associated transmission infrastructure, as national developments under Annex B of NPF4 – National Development Statements of Need, category 3: Strategic Renewable Electricity Generation and Transmission Infrastructure. This designation confirms the Project's national significance and establishes a strong presumption in favour of its delivery, including through the approval of all required consents and licences.

3.2 Climate change

3.2.1.1 The Climate Change Act (2008) (UK Government, 2008) legally binds the UK to reduce GHG emissions by at least 80% by 2050 compared to 1990 levels. The Climate Change (Scotland) Act 2009 (Scottish Government, 2009) builds on this UK legislation and provides the Scottish framework.

3.2.1.2 The Scottish Government's Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 sets out the aim to replace annual and interim targets with multiyear carbon budgets to ensure Scottish Ministers are legally bound to meet these goals. The Scottish Government's commitment to achieving the stated targets depends upon a combined effort from the renewable energy sector, including offshore wind. This requirement for a concerted effort to achieve climate change targets is reiterated through the Scottish Energy Statement (Scottish Government, 2020c) and Offshore Wind Policy Statement (Scottish Government, 2020d), which outline the approach to a low-carbon energy future, including the strategic importance of offshore wind in meeting Scotland's climate targets.

3.2.1.3 Offshore wind is also identified as one of the frontier industries within the clean energy growth driving sector of the UK Modern Industrial Strategy 2025 (UK Government, 2025a). The value of this industry in helping achieve climate change targets is therefore indisputable and justifies the need for offshore wind developments such as the Project in addressing net zero emissions and climate ambitions.

3.2.1.4 NPF4 guidance: Policy 2 – climate mitigation and adaptation (Scottish Government, 2025c), published in June 2025 highlights that Scotland is halfway to achieving its 2045 net zero target for all GHG emissions. The delivery of up to 3GW of renewable energy by the Project will make a significant contribution to closing this gap, supporting Scotland's ambitious climate change and carbon budget objectives.

3.3 Energy policy

3.3.1 United Kingdom

3.3.1.1 The increasing urgency of climate change and the need for a secure, resilient energy supply have driven the development of robust legislation and policy frameworks to accelerate renewable energy deployment**.** The strategic policy context against which the Project will be delivered demonstrates a clear and pressing need for large-scale offshore wind development.

3.3.1.2 The overarching framework for marine planning, including support for renewable energy development, is set out within the UK Marine Policy Statement (HM Government, 2011) and bolstered by National Policy Statement (NPS) for Energy (EN-1) (Department for Energy Security & Net Zero, 2023a) and the Offshore Wind Sector Deal (HM Government, 2017a). It should be noted that the NPS are applicable UK-wide, rather than being Scotland-specific, and their weight in Scotland is therefore more limited than other offshore policy published by the Scottish Government. These documents collectively highlight the urgent need for low-carbon energy infrastructure, such as offshore wind, to achieve the UK's net zero targets.

3.3.1.3 NESO's HND, HND FUE and Beyond 2030 publications form the strategic context for integrating offshore wind into the energy system. The HND FUE builds upon the original HND's coordinated vision for offshore transmission infrastructure to support the UK's 2030 target of 50GW offshore wind capacity, by refining and expanding on the design to accommodate additional projects, updated data, and stakeholder feedback.

3.3.1.4 In March 2024, NESO published the 'Beyond 2030' report, which sets out network recommendations throughout the 2030s, including a £58 billion direct investment for offshore and onshore network upgrades. The report assesses potential solutions against four design objectives including: cost; deliverability; impact on the natural environment; and impact on the local community. As discussed in **paragraph 2.2.1.12**, the report identified the location for the full 3GW connection as being within the vicinity of Peterhead and SSEN subsequently confirmed the Project's connection point as the Netherton Hub at Longside near Peterhead, which was granted PPiP by Aberdeenshire Council in August 2025.

3.3.1.5 The HND implementation plan and its suite of associated assessments have been published to support the delivery of the HND and HND FUE. These documents provide a high-level evaluation of the cumulative environmental impacts of proposed offshore transmission corridors, landfall sites, and related infrastructure.

3.3.1.6 The UK Government's Clean Power 2030 (UK Government, 2024) sets ambitious targets of 43GW – 50GW of offshore wind by 2030, reiterating the urgent need for investment and rapid deployment in the sector. Importantly, the Action Plan also sets a further target of 72 – 89GW of offshore wind capacity by 2035, reflecting the UK's commitment to decarbonising the electricity system and achieving net zero. This longer-term target is particularly relevant to the Project, given the anticipated delivery of the first phase of the Project in 2037 and operational timeline of approximately 35 years for each Project phase. The justification for offshore wind developments, such as MarramWind, is therefore clearly set out within UK energy policy, both for 2030 and 2035, supporting the case for strategic-scale renewables as essential national infrastructure.

3.3.2 Scotland

3.3.2.1 Alongside the UK energy policy publications, the following Scottish publications are key to providing the energy policy backdrop, against which the Project will be delivered:

- The Electricity Generation Policy Statement 2013 (Scottish Government, 2013);
- Scottish Energy Strategy 2017 (Scottish Government, 2017);
- Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), updated in May 2025 in the Offshore Wind Energy – Draft Updated Sectoral Marine Plan 2025: Consultation Document (Scottish Government, 2025d);
- Offshore Wind Policy Statement 2020 (Scottish Government, 2020d); and
- Draft Energy Strategy and Just Transition Plan (Scottish Government, 2023b).

3.3.2.2 The Applicant provided a response to the Scottish Government's consultation on the Updated Offshore Wind Ambition which recognised the importance and implications of the update. The Applicant broadly welcomes the scale of the Scottish Government's proposed new offshore wind ambition and believes that this updated target, expected before the end of 2025, could help strengthen Scotland's current offshore wind development pipeline beyond 2030. The proposed deployment of at least 40GW of new offshore wind capacity by 2035 – 2040 and aim to maximise deployment before the end of Scotland's second Carbon Budget period in 2035 is highlighted however the consultation response considers that this ambition should also align with the achievement of UK-level climate and energy policy objectives including the sixth and seventh Carbon Budgets (2033 – 2037 and 2038 – 2042, respectively).The Applicant considers that the proposed ambition of 40GW of new deployment, above operational capacity, should be seen as a firm ambition and the Scottish Government should set a sub-ambition, within the overall 40GW target, for the deployment of new floating offshore wind farms to support the acceleration of market maturity and project deployment. In addition to encouraging the announcement of the finalised new

offshore wind ambition, including sub-ambition for floating offshore wind, at the earliest opportunity, the Applicant recognises the achievement of Scotland's updated ambition to require a whole-system approach and close alignment between the Scottish and UK Government.

3.3.2.3 The national need for the Project is further established through Policy 11 of NPF4, which supports development that contributes to decarbonisation targets and energy security. The identification of strategic-scale renewables, such as offshore wind, as a national development emphasises the significance of the Project in helping achieve energy policy goals.

3.3.2.4 With the Scottish Government's Increasing offshore wind ambition consultation (Scottish Government, 2025e) setting out an aim of 40GW of new offshore wind capacity by 2040, there is a clear and urgent demand for developments such as the Project.

3.3.2.5 By producing local, renewable energy, the MarramWind Offshore Wind Farm will enhance energy security for Scotland and the wider UK, reducing reliance on imported and polluting hydrocarbons. This not only supports decarbonisation, it also helps insulate Scotland and the UK from the risks associated with increasingly unstable global politics and supply chain.

3.4 The benefits and need of the development

3.4.1 Project objectives

3.4.1.1 This section demonstrates how the Project will deliver substantial benefits in support of national and regional policy objectives, including climate change mitigation, energy security, supply chain development, technological innovation, and socio-economic growth, underpinning the case for consent determination.

3.4.1.2 These benefits are directly aligned with statutory requirements and policy ambitions set out by the UK and Scottish Governments. The delivery of these benefits directly supports the determination of consent by the MD-LOT and Scottish Ministers, in line with statutory and policy requirements. By demonstrating how the Project will contribute to net zero targets, enhance energy resilience, stimulate local investment, and create new employment opportunities, this Planning Statement provides a robust rationale for approval and ensures that the Project meets the expectations of the determining authorities.

3.4.1.3 The series of Project-wide objectives, developed to help ensure that the MarramWind Offshore Wind Farm achieves specific goals, include:

- **Objective 1:** To export a significant volume of renewable electricity to the National Grid in support of UK and Scottish Government targets, ambitions and commitments for net zero emissions and offshore wind generation. This includes making an important contribution to the achievement of the Scottish Government's updated offshore wind ambition of 40GW of new deployment by 2035 - 2040.
- **Objective 2:** To increase security of supply for Scottish and UK consumers by being one of the largest floating offshore wind projects in Scottish waters.
- **Objective 3:** To support the realisation of Scotland's deep-water potential and maximise use of the available seabed in synergy with other users.
- **Objective 4:** To support and secure the development of the Scottish supply chain by being one of the largest floating offshore wind projects in Scottish waters, providing continuity and security for supply chain development.

- **Objective 5:** To drive technological innovation with the aim of lowering the costs to Scottish and UK consumers.
- **Objective 6:** To support socio-economic growth in Scotland and contribute to achieving a Just Transition.

3.4.1.4 The following sections discuss how the Project responds to each of the Project objectives.

3.4.2 Objective 1

3.4.2.1 Floating offshore wind is essential to achieving the UK and Scotland's legally binding net zero targets - 2045 for Scotland and 2050 for the UK. The Project will generate up to 3GW of renewable electricity, significantly displacing carbon-intensive generation and contributing to long-term decarbonisation.

3.4.2.2 The Project will play a critical role in sustaining emissions reductions beyond 2030. It also supports Scotland's ambition for 40GW of offshore wind deployment by 2035 - 2040, helping to meet future energy demand with clean, homegrown power.

3.4.2.3 As set out within **Volume 1, Chapter 29: Greenhouse Gases** of the **EIA** Report, the electricity generation from the Project is expected to provide a net benefit in supporting ongoing efforts to decarbonise generation on the UK national electricity network. Moreover, the displaced GHG emissions across the Project's operational lifetime are greater than the reported emissions in its construction, O&M and decommissioning, demonstrating the positive impacts expected to emerge from the Project.

3.4.2.4 The Project as a whole would help to meet net zero goals and renewable energy targets, with an installed capacity of 3GW and ability to produce low carbon electricity during its operation. This would help to ensure the UK Government meets its legal requirement to achieve net zero by 2050 and help the Scottish Government hit its legal requirement to achieve net zero by 2045.

3.4.2.5 Given the significant contribution of renewable electricity generation by the Project over its lifetime, it is expected to offset its lifecycle emissions after five years of its operational life, with a carbon savings of 5,978,074 tCO_2e/year, as noted in **Volume 1, Chapter 29: Greenhouse Gases** of the **EIA Report**. The Project will continue to offset GHG emissions throughout is operational life and therefore make a positive contribution to the UK Government's target to reach net zero emission in 2050.

3.4.3 Objective 2

3.4.3.1 By generating 3GW of homegrown electricity, the Project will reduce reliance on imported fossil fuels and enhance the UK's energy independence. This will help insulate consumers from global energy price volatility and geopolitical instability, which have disrupted energy markets in recent years.

3.4.3.2 A more resilient and diversified domestic energy mix will reduce exposure to external shocks and contribute to long-term affordability and stability for consumers.

3.4.3.3 The Project would further aid Scotland and the wider UK to ensure it has energy security, producing local clean renewable energy that is not contingent upon importing and processing polluting hydrocarbons in order to produce electricity. This further helps to secure Scotland and the UK from an increasingly unstable global politics and supply chains.

3.4.4 Objective 3

3.4.4.1 Scotland's deeper offshore waters offer some of the strongest and most consistent wind resources in Europe but are inaccessible to fixed-bottom turbines. The Project will unlock this potential through floating technology, enabling large-scale clean energy generation in areas previously undevelopable.

3.4.4.2 By locating further offshore, the Project makes efficient use of limited seabed and benefits from high and consistent wind speeds, resulting in more reliable and higher-yield electricity generation. This translates to a higher capacity factor and reduced intermittency compared to near-shore sites.

3.4.5 Objective 4

3.4.5.1 The Project's phased construction over a 12 year period will provide long-term certainty to the Scottish offshore wind supply chain. As one of the largest floating wind projects in development, it will anchor investment, stimulate innovation, and create sustained demand for local manufacturing, fabrication, and services. This continuity will help build a globally competitive supply chain and support the growth of a green industrial base in Scotland.

3.4.6 Objective 5

3.4.6.1 The Project will deploy floating wind technology at commercial scale, moving beyond pilot projects to full-scale infrastructure. With the aim of driving down costs through economies of scale and technical innovation, this Project will accelerate learning and help position the UK as a global leader in floating offshore wind.

3.4.6.2 Scotland has an early mover advantage through projects like Hywind and Kincardine, and leasing rounds such as ScotWind and INTOG. The Project will build on this foundation to further advance floating wind technology and cement the UK's leadership in this emerging sector.

3.4.7 Objective 6

3.4.7.1 Facilitating socio-economic development is a key ambition in Scotland's Draft Energy Strategy and Just Transition Plan (Scottish Government, 2023a), which aims to maintain or increase employment as the sector moves from high carbon to low carbon energy generating technologies, such as floating wind.

3.4.7.2 The Project will facilitate socio-economic development by generating new low-carbon jobs, increasing opportunities for Scottish suppliers and helping to develop the future offshore workforce, skills and employability.

3.4.7.3 Given the scale of the project and the 12 year phased construction period, the socio-economic benefit is expected to be wide reaching.

3.4.7.4 The Project seeks to deliver positive outcomes for the environment and local communities that extend beyond its contribution to net zero. Community engagement will be central to this approach, with ongoing dialogue informing how benefits are delivered locally. This includes supporting rural economies, tourism, and nature-based initiatives where appropriate, and ensuring that any commitments are grounded in practical feasibility and stakeholder input. This objective reflects the Project's broader ambition to embed social value into the project's development and delivery.

3.4.7.5 As detailed in **Volume 1, Chapter 30: Socio-economics** of the **EIA Report**, the Project is committed to utilising the local workforce and suppliers where possible and would create an average of 1,250 jobs across construction and operational roles.

3.4.7.6 Offshore wind is identified as an important source of investment within the Aberdeenshire region, with £22 billion of energy-related investment expected within the region over the next decade (Peterhead Energy Transition Forum, 2025).

3.4.7.7 The Applicant has developed a Socio-Economic Action Plan (SEAP) for the MarramWind Offshore Wind Farm. The SEAP sets out the measures to harness the local and regional opportunities and maximise the social and economic performance of the Project. It provides an overview of the key demographic, economic, and social indicators that were used to inform its development.

3.4.7.8 The SEAP also provides a policy review and an assessment of the supply chain capabilities in Scotland, with a particular focus on the regional study area of the Northeast (Aberdeen City, Aberdeenshire, Moray and Highlands). It concludes with a series of recommendations intended to assist the Applicant in achieving the Project objectives.

3.4.7.9 The SEAP identified the following future baseline challenges:

- **Challenge 1**: The demographic trends identified could pose challenges for workforce availability and productivity.
- **Challenge 2**: Despite strong migration inflows, Aberdeenshire attracts relatively few working age migrants, posing potential workforce retention challenges.
- **Challenge 3**: The regional study area experiences notable deprivation in access to services, crime, housing affordability, and education. Concentrations of deprivation are most pronounced in Peterhead and Fraserburgh, where multiple forms of deprivation, including income, education, and crime are coincide with challenges regarding transport connectivity.
- **Challenge 4**: Local trends in qualification attainment may present barriers to accessing high-skilled roles in offshore renewables locally, highlighting the importance of targeted skills and training initiatives, specifically in industries and courses that will help address skills shortages in the sector.
- **Challenge 5**: Limited or no work experience presents a key barrier to employment across Scotland, and employment retention rates in the regional study area are below the national average.
- **Challenge 6**: Workforce may require reskilling and adaptation to meet specific demands of offshore wind.
- **Challenge 7**: Housing deprivation indicated by potential challenges in availability of rented tenure properties and slower local house price growth compared to the national average.
- **Challenge 8**: Larger firms dominate engineering, consultancy and legal contracts, while subject matter experts (SMEs) are mainly active in specialist environmental survey work. SMEs typically deliver smaller contracts (<£1m) or act as subcontractors to larger firms and consultancies.
- **Challenge 9**: Scotland lacks serial production facilities, has a fragmented supply chain, and ports are privatised. Within the regional study area, SMEs are primarily active in mooring systems, while cable manufacturing is dominated by larger firms.

3.4.7.10 The SEAP identified the following future baseline opportunities:

- **Opportunity 1**: Foundation to develop a growing skilled workforce pipeline for the renewables and related industries supply chain.
- **Opportunity 2**: Foundation to target employability interventions and support to improve job retention in renewables and related industries.
- **Opportunity 3**: Evidence of a strong and engaged workforce with favourable labour market conditions locally.
- **Opportunity 4**: The local employment base is aligned with sectors associated with renewables and related industries.
- **Opportunity 5**: Evidence of a dispersed local labour market from which the renewables industry can draw to create local employment opportunities.
- **Opportunity 6**: The regional study area benefits from existing infrastructure, and a robust skills ecosystem with key assets including educational institutions and skills partnerships.
- **Opportunity 7**: The regional study area has considerable expertise in development and project management, with a number of established suppliers.
- **Opportunity 8**: Scotland has strong expertise in installation and commissioning, particularly in offshore logistics, heavy-lift operations, subsea engineering, and port services. Larger contractors deliver major contracts, while specialist SMEs provide niche services within wider installation packages.
- **Opportunity 9**: Scotland has strong O&M capabilities, particularly in the regional study area around Aberdeen, leveraging the established oil and gas supply chain. Ports are a key enabler for O&M, with most suitable construction and operational ports located in the regional study area.

3.4.7.11 The SEAP identified the following future baseline challenges: The SEAP sets out the actions the applicant will undertake at key points in the Project's lifecycle, to help businesses and communities in the region realise opportunities and leverage value from the development, construction and operations of the Project's onshore and offshore infrastructure. These actions have been grouped into four main themes as follows:

- **Supporting the Supply Chain:** Actions that will help create greater capability, capacity and awareness of offshore wind opportunities within supply chain companies, including a commitment to allocating £500,000 from the Project's Offshore Wind Stimulus Fund to support upskilling, innovation and business growth for supply chain companies in the region.
- **Promoting Fair Employment:** Actions to support fair employment generated by the Project, including a commitment to offer guaranteed interviews to people local to the wind farm's operational base who meet minimum job requirements.
- **Providing Skills and Training:** Actions to support the provision of training and skills development relevant to offshore wind that include a commitment to working with regional education partners to support apprenticeships and / or work experience placements associated with the Project's construction and operation.
- **Supporting and Enhancing Communities:** Actions to support community wealth building priorities and community-led projects, which include a commitment to establishing a community benefit fund around the time the Project becomes operational.

3.4.7.12 The SEAP actions and commitments are iterative in nature and will be subject to further development and refinement as the Project progresses, including the incorporation of Key Performance Indicators (KPIs). The Applicant will continue to engage with local, regional and national partners to inform the development and delivery of the actions within the SEAP, which will be updated at regular intervals. The Applicant will also report on progress being made towards the delivery of the SEAP actions and commitments at regular intervals.

3.4.7.13 The Project will generate additional economic activity from expenditure along with increased employment. The Gross Value Added (GVA) in an economy can be seen as the difference between revenues and costs for firms. Firms vary in their use of resources and labour but on average approximately 60% of GVA is made up of "compensation of employees", which includes salaries and costs to employers such as national insurance (ONS, 2025b). As such, the proportionate effects on employment are a close proxy for the effects on GVA.

3.4.7.14 There is a wide range in the estimates published in relation to projections of GVA in the clean energy and offshore wind sector. On a per Full-time equivalents (FTE) basis, a recent industry report for Scottish Renewables (2025) identifies that 41,500 FTE jobs in the offshore wind sector would lead to GVA of £1.4bn in 2032 at the expected peak of construction, giving a ratio of £33,810/FTE (in 2025 prices). Alternatively, the Department for Energy Security and Net Zero (DESNZ) has estimated an average value of GVA for offshore wind of £103,000/FTE (in 2025 prices). Estimates depend on assumptions over activities undertaken in Scotland, the composition of skills requirements and salary levels. Estimates based on the construction expenditure in the Supply Chain Development Statement (SCDS) for the Project are approximately £140,000/FTE but, given potential uncertainties, the lower average calculated by DESNZ has been used by the Applicant to reflect a more conservative approach.

3.4.7.15 The GVA from operations is related to more specific activities with greater certainty and has a greater proportion of expenditure related to employment. An estimate of £93,000/FTE is used which is calculated from the SCDS and industry estimates from the Applicant.

3.4.7.16 The level of GVA in Scotland generated by the Project calculated using the SCDS values and related employment projections is an average of £121.2m annually over the construction period and continues at £99.0m annually during the operational period.

3.4.7.17 The effects from these monetary flows are reflected in the economic context in multiple ways, from local spending to greater local tax receipts and greater activity supporting local businesses.

3.4.7.18 The Peterhead Energy Transition Forum (PETF) (Peterhead Port Authority, 2025) recognises that development of the onshore elements of the Project would help to increase economic activity within the area, whilst also enabling the use of clean, renewable energy. The Project as a whole is well-sited to deliver wide ranging economic benefits and to capitalise on being located near to Peterhead, which is a growing and identifiable hub for offshore wind logistics and operations for the Scottish North Sea, including the MarramWind OAA.

4. Consultation and Engagement

4.1 Introduction

4.1.1.1 This Section provides a summary of the pre-application consultation undertaken with local communities. A detailed account of the consultation process is provided in the accompanying Pre-Application Consultation (PAC) Report.

4.1.1.2 In line with best practice the Applicant has adopted a whole project approach to consultation. Whilst statutory consultation is not presently required for applications under s.36 of the Electricity Act 1989, it has been undertaken in accordance with relevant legislative requirements covering relevant applications for onshore planning permission and for marine licences. All elements of the Project including proposed infrastructure within the OAA have been consulted on at the same time and in a similar manner, even where not statutorily required. An overview of this approach is presented below with detail provided within the accompanying PAC Report. These activities have included multiple rounds of consultation events (see **Table 4.1**), targeted outreach, and opportunities for feedback, ensuring meaningful dialogue throughout the development process.

4.1.1.3 The consultation and engagement programme has been designed to support the determination of consent by MD-LOT and Scottish Ministers, ensuring that stakeholder views are considered in Project design, mitigation measures, and decision-making.

4.2 Legislative requirements for consultation

4.2.1.1 Statutory PAC applies in respect of licensable marine activities within 12 nautical miles of shore, as required under the Marine Licensing (Pre-Application Consultation) (Scotland) Regulations 2013.

4.2.1.2 Marine licences are required to undertake prescribed marine licensable activities for the Project, including deposition of cables and other objects on or within the seabed, installation of any necessary cable protection, installation of mooring lines and anchors, and the installation of any wider infrastructure or substructures required in the marine environment.

4.2.1.3 The Applicant has addressed the requirements of the relevant regulations during the pre-application consultation process, as detailed within the **Pre-Application Consultation Report (PAC) Report**.

4.3 Consultation events

4.3.1.1 The pre-application process was planned to include two rounds of statutory consultation. As the 18-month timeframe from Proposal of Application Notice to planning application lapsed, a new notice was submitted, and two further rounds of statutory consultation were held.

4.3.1.2 **Table 4.1** below outlines the timings of consultation rounds and events. At each consultation event, representatives for the Applicant were present to explain the proposals and answer any questions from attendees.

Table 4.1 Statutory Consultation Events

Date	Time	Event	Location
Statutory Consultation: 1st Round (27 May – 1 July 2024)			
30 May	18:00 – 19:00	Q&A event	Online
6 June	13:00 – 19:00	Public drop-in and VIP hour	Palace Hotel, Princes Street, Peterhead
7 June	13:00 – 19:00	Public drop-in and VIP hour	Longside Parish Hall, Peterhead
26 June	18:00 – 19:00	Q&A event	Online
Statutory Consultation: 2nd Round (9 October – 19 November 2024)			
7 October	18:00 – 19:00	Q&A event	Online
29 October	13:00 – 19:00	Public drop-in and VIP hour	Palace Hotel, Princes Street, Peterhead
30 October	13:00 – 19:00	Public drop-in and VIP hour	Longside Football Club
7 November	18:00 – 19:00	Q&A event	Online
Statutory Consultation: 3rd Round (18 August – 9 September 2025)			
27 August	14:00 – 19:00	Public drop-in session	Palace Hotel, Prince St, Peterhead
Statutory Consultation: 4th Round (30 October – 13 November 2025)			
3 November	14:00 – 19:00	Public drop-in session	Longside Football Club

4.3.2 Offshore Statutory Consultation feedback

4.3.2.1 As detailed within the **PAC Report**, the statutory consultation approach for the Project has been applied covering both onshore and offshore considerations and associated statutory consenting requirements. All feedback has been analysed and organised into themes to provide a logical overview of responses and how they relate to the project. **Table 4.2** outlines relevant offshore feedback that has been shared throughout the four rounds of consultation. Statutory consultation covered both onshore and offshore considerations and associated statutory consenting requirements.

4.3.2.2 A total of 40 formal responses were received to the consultations. 26 were received during the first consultation, with six during the second, two during the third and five in the fourth consultation.

4.3.2.3 Feedback from consultees was analysed using quantitative analysis of the questionnaire responses, which are presented in the **PAC Report** as figures or tables. The open responses and emails required further analysis through a process called coding to identify

common themes. A code frame was created by reviewing a sample of the responses received and identifying a set of common themes and areas of comment. Each theme was given a unique code made up of an alphabetical reference and a general topic covered.

4.3.2.4 The Applicant also met with the Scottish Fishermen's Association, and individual inshore fishers during the Statutory Consultation rounds. The fishing representatives shared their knowledge of certain areas that are good grounds for scallopers, lobster pots, and trawling for white fish and prawns.

4.3.2.5 Feedback provided during all rounds of statutory consultation covered a wide range of subject matters in relation to offshore planning. **Table 4.2** summarises key feedback.

Table 4.2 Stakeholder feedback summary (offshore)

Theme	Stakeholder feedback	Applicant response
Protecting and enhancing marine environment	Leave local habitats and landscapes in a better condition than they currently are to encourage greater biodiversity.	An ecological desk study and baseline surveys have been undertaken, identifying how to avoid or mitigate effects and opportunities for ecological enhancement. This will inform the Project's **Nature Positive Plan** to encourage biodiversity and strengthen existing nature networks. The plan will set out how we intend to measure, monitor and enhance biodiversity.
	Concern about the impact of the environmental surveys on marine life, e.g. sonar survey impact on whales.	Environmental surveys for the project are subject to risk assessment for their potential to impact upon sensitive marine species including whales, and to licensing under UK law. Surveys are approved where the competent authority deems the risk to be adequately mitigated and managed.
	A survey on brown crabs and lobsters should be undertaken before and after the offshore cable is installed.	A survey of marine life on the in 2023 across the wind turbine site and along the offshore cable corridor did not identify brown crab or European lobster. However, this does not indicate these species are not present so we are working with commercial fisheries to understand marine areas. We will follow any advice from MD-LOT and NatureScot to conduct further studies as necessary.
Visual effects	Concerns about effects on seascape, landscape and visual considerations.	The lasting visual effect of the project at landfall will be negligible, as the onshore and offshore cables and transition joint bays (where the two cable types meet) will be underground.

Theme	Stakeholder feedback	Applicant response
Planning for the future	MarramWind should consider future projects during construction and potential extensions to the wind farm to minimise disruption.	We are committed to minimising disruption and planning for the long-term, and it is important to balance this with the practicalities of the current project. We will design the onshore substation with flexibility in mind, within the constraints of the site, to allow for potential upgrades or modifications in the future. Given other seabed users in the vicinity and the limits of the lease and grid, it is highly unlikely we would seek to extend MarramWind beyond its current boundaries.
Offshore Infrastructure	Suggestion for all offshore generated power to remain offshore or that the substation is kept offshore.	Offshore-generated power must come onshore to meet demand. The onshore grid connection location was determined by the NESO. Offshore HVDC interconnectors will then route power from Peterhead to North Yorkshire and Lincolnshire, removing the need for extensive onshore infrastructure to be built.
	Suggests trenching and rock dumping over the offshore cable corridor to reduce effect on wildlife and habitats.	The project intends to bury the offshore cable wherever possible as the most effective method for protecting the cable from damage and for avoiding changes to marine habitats. Cable protection will only be used where cable burial is not possible.
Landfall infrastructure	Request that MarramWind work with the neighbourhood board and Port Authority.	MarramWind is committed to building strong relationships with local organisations and stakeholders to ensure the project is developed in a way that reflects community priorities and supports regional infrastructure. We will continue to engage with key local bodies to explore opportunities for collaboration throughout the planning, construction, and operational phases of the project.
Fishing	Concerned about the short- and long-term effects on the local inshore fishery, seabed habitats and onshore fishing industry.	Cumulative effects will be assessed in the EIA Report including in relation to offshore cabling, marine habitats and fisheries and inshore fishing industry.

Theme	Stakeholder feedback	Applicant response
	Concerns about how the cables might affect lobster, velvet crab and brown crab fishing with cables coming ashore around Peterhead.	The EIA will evaluate potential effects on marine species along the offshore cable corridor, including habitat disturbance, sediment release, and electromagnetic fields. We are engaging with fishing groups to understand concerns and will develop a Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) to guide monitoring and mitigation efforts. This plan will be informed by data from vessel tracking, guard vessel observations, and stakeholder input.
	Request for a pre and post-cable installation fishing assessment to measure any effect on the inshore fisheries.	A FMMCP will be developed and submitted alongside the Application for Consent. Any requirement for species-specific surveys, either before or after construction, will be guided by advice from MD-LOT and NatureScot, and may be stipulated as part of consent conditions.
	Concern that the project will disturb the seabed and pollute the waters.	The mooring and anchoring systems for MarramWind are being carefully selected to minimise environmental impact and to comply with all relevant regulations, including those related to navigational safety, and potential effects on the seabed and marine ecosystems. Prior to the installation of offshore cables, the seabed will be surveyed and prepared to remove obstacles such as debris and boulders. Wherever feasible, cables will be buried 1–2 metres beneath the seabed to minimise disruption to marine habitats. Rock placement in nearshore areas, where burial may not be suitable. Further stakeholder engagement will take place during the design phase to ensure that local knowledge and concerns are fully considered.

4.3.3 Impact of consultation on project development

4.3.3.1 The insights gathered through these consultations have informed design refinements and mitigation strategies, ensuring alignment with stakeholder expectations and regulatory requirements.

Feedback from the first round of consultation (non-statutory)

4.3.3.2 Key concerns in relation to landfall and the nearshore area:

- seascape, landscape and visual considerations;
- environmental protection;
- construction methods and installation; and
- intertidal wildlife, including birds.

4.3.3.3 This feedback contributed to the decision to exclude Sandford Bay for landfall. Sandford Bay is partially within the Buchan Ness to Collieston Coast Special Protection Area. While all sites are considered relatively challenging for construction and installation, Sandford Bay is considered the weakest option in this regard.

Feedback from the second round of consultation (statutory)

4.3.3.4 Key feedback in relation to offshore infrastructure:

- Propose trenching and rock dumping around cables to minimise effect on wildlife.

4.3.3.5 In line with feedback, the project intends to implement the most effective method for protecting the cable from damage and for avoiding changes to marine habitats. In most cases this will involve burying the offshore cable wherever possible. Cable protection will only be used where cable burial is not possible.

Feedback from the third round of consultation (statutory)

4.3.3.6 Key feedback in relation to offshore infrastructure:

- concern that the project will disturb the seabed and pollute the waters.

4.3.3.7 To ensure disturbance to the seabed is kept to a minimum and in line with feedback, mooring and anchoring systems for MarramWind are being carefully selected to minimise environmental impact. These systems will comply with all relevant regulations, including those related to navigational safety, and will take into account potential effects on the seabed and marine ecosystems.

4.3.3.8 The seabed will be surveyed and prepared to remove obstacles such as debris and boulders. Wherever feasible, cables will be buried 1–2m beneath the seabed using specialised cable-laying vessels. This approach helps to minimise disruption to marine habitats.

Feedback from the fourth round of consultation (non-statutory)

4.3.3.9 Key feedback in relation to offshore infrastructure:

- Concern that the concentration of multiple developments using the same landfall, its effect on the local area and rendering the beach unusable for beach users.

4.3.3.10 Considering feedback from beach users, alongside technical reports, the decision has been made that landfall export cable infrastructure will be installed below ground using HDD (or similar trenchless technique). The export cable entry point would be located within a temporarily fenced off area within a temporary construction compound, and the export cable exit point would be on the seabed. Consequently, it is not envisaged that onshore / landfall infrastructure, either during construction or for the operational phase, will restrict access or cut off access to the coast.

4.3.4 Pre-consultation engagement

4.3.4.1 In 2023, the Applicant held a pre-consultation engagement Scoping Opinion consultation and Drop-In Day (DID). This non-statutory event included an introductory hour for stakeholders followed by a public drop-in session. The aim was to introduce the Project to the local community and gather initial feedback ahead of Statutory Consultations.

4.4 Summary

4.4.1.1 The Applicant has undertaken a comprehensive programme of consultation and engagement to ensure that communities and stakeholders with an interest in the Project are well-informed about the emerging development proposals and have had meaningful opportunities to share their views.

4.4.1.2 Details of all community engagement activities, along with supporting evidence, is provided in the accompanying **PAC Report**. The Applicant remains committed to ongoing stakeholder engagement throughout the planning application process and across the construction, operational, and decommissioning phases of the Project, to promote open communication and collaborative working.

5. Legislation and Policy Context

5.1 Introduction

5.1.1.1 This section of the Planning Statement provides an overview of the legislative context and relevant planning policy documents, their status and purpose, summarising the framework against which the consenting applications will be determined. A comprehensive review of the legislative and policy context applicable to the Project is provided in **Volume 1, Chapter 2: Legislative and Policy Context** and **Volume 3, Appendix 2.1** of the **EIA Report**.

5.1.1.2 In the case of this s.36 consent application, the national policies that are relevant in the decision making of the proposed offshore infrastructure include:

- NPF4;
- UK Marine Policy Statement;
- Scotland's National Marine Plan;
- Sectoral Marine Plan for Offshore Wind Energy; and
- Draft Updated Sectoral Marine Plan.

5.1.1.3 Scotland's Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) will also be an important consideration when assessing the proposed offshore infrastructure.

5.1.1.4 An assessment of the Project against the relevant policies, tests and criteria contained within these publications and other valid considerations is provided in **paragraph 6.2.1.7** and therefore for brevity these specific details are not repeated here.

5.1.1.5 In addition, the UK Government's National Policy Statements represent relevant considerations.

5.2 Applicable National Policies

5.2.1 Scotland's National Marine Plan

5.2.1.1 Scotland's National Marine Plan was adopted by the Scottish Government on 27 March 2015 and sets out how inshore waters (out to 12nm) and offshore waters (12 to 200 nautical miles) should be managed.

5.2.1.2 Chapter 11 of the National Marine Plan is focused upon the sustainable development of offshore wind and marine renewable energy. This Chapter seeks to ensure that offshore renewable energy development maximises its economic benefit, helps to achieve renewable energy and decarbonisation targets, and ensure such development is as sustainable as possible.

5.2.2 Sectoral Marine Plan for Offshore Wind Energy 2020

5.2.2.1 The Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) was adopted by the Scottish Government on 28 October 2020. It identifies sustainable locations that are potentially able to accommodate offshore wind development, seeking to contain such development within such locations. The plan also seeks to ensure offshore wind plays an important role in meeting Scotland's renewable energy targets, whilst also ensuring

offshore wind development minimises its potential adverse impacts and maximise economic opportunities.

5.2.3 Offshore Wind Energy – Draft Updated Sectoral Marine Plan 2025: Consultation

5.2.3.1 Consultation of an updated Sectoral Marine Plan started in May 2025, with consultation close in August 2025, with the consultation analysis report issued November 2025. The Draft Updated Sectoral Marine Plan (Scottish Government 2025a) seeks to continue the aims of the existing Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) but does provide updated sustainable offshore locations for development. The Draft Updated Sectoral Marine Plan (Scottish Government 2025a) further highlights the need for offshore wind development to manage its potential landscape and seascape effects and minimise potential harm and disturbance to marine and bird species.

5.2.4 National Planning Framework 4

5.2.4.1 NPF4 was adopted by the Scottish Government on 13 February 2023 and sets out the national spatial strategy for Scotland to 2045. NPF4 sets out Scotland's spatial principles, regional priorities, national developments, and national planning policy. NPF4 replaces the previous NPF3, Scottish Planning Policy (SPP) documents, and Strategic Development Plans.

5.2.4.2 The Applicant recognises that NPF4 and the policies therein are applicable to both the onshore and offshore elements of the Project, unless a policy clearly states otherwise. National Development status under NPF4 is an important consideration for both the s.36 consent and the onshore PPiP application being sought under the Town and Country Planning (Scotland) Act 1997. This approach ensures that the Project is assessed against the policy support for renewable energy and grid infrastructure provided by NPF4, and that compliance with all relevant policies is demonstrated. NPF4 brings together the long-term spatial strategy with national planning policies as part of the statutory Development Plan. NPF4 contains six overarching spatial principles that are key in achieving the goal of sustainable, liveable and productive places, including:

- Just Transition;
- Conserving And Recycling Assets;
- Local Living;
- Compact Urban Growth;
- Rebalanced Development; and
- Rural Revitalisation.

5.2.4.3 The policy sets out specific advice for individual policies in NPF4, including renewable energy and climate mitigation. NPF4 prioritises development which addresses the global climate emergency and identifies strategic-scale renewables, such as offshore wind, as national developments under Annex B of NPF4 – National Development Statements of Need (see page 97), under category 3: Strategic Renewable Electricity Generation and Transmission Infrastructure. This designation confirms the national need for the Project and establishes that the principle of the development is accepted at the national level. NPF4 policies considered of greatest relevance to the onshore elements of the Project are detailed in **Volume 3, Appendix 2.1** of the **EIA Report**, and are set out briefly below:

- Policy 1: Tackling the climate and nature crises;
- Policy 2: Climate mitigation and adaptation;
- Policy 3: Biodiversity;
- Policy 4: Natural places;
- Policy 10: Coastal development;
- Policy 11: Energy;
- Policy 12: Zero waste;
- Policy 13: Sustainable transport;
- Policy 14: Design, quality and place;
- Policy 18: Infrastructure first;
- Policy 20: Blue and green infrastructure;
- Policy 22: Flood risk and water management; and
- Policy 23: Health and safety.

5.2.4.4 The national need for the Project is further established through Policy 11 of NPF4, which states that *"development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported*." This policy supports development that contributes to decarbonisation targets and energy security. The identification of strategic-scale renewables, such as offshore wind, as a national development emphasises the significance of the Project in helping achieve energy policy goals. NPF4 sets out a high-level strategy for development in Scotland for the plan period. The Project falls under the Strategic Renewable Electricity Generation and Transmission Infrastructure National Development within the NPF4, confirming its national significance and the importance of aligning with the aforementioned policies. Policies 1 (Tackling the climate and nature crises) and 11 (Energy) are of particular significance as detailed in **Volume 3, Appendix 2.1** of the **EIA Report**.

5.2.4.5 The Scottish Government are currently preparing guidance documents related to specific NPF4 policies, in order to clarify expectations and assist in the policies' interpretation. It is intended that the guidance documents help to standardise the decision-making process and reduce uncertainty for applicants. Whilst the Scottish Government continues their work in preparing these guidance documents, the Policy 2 – climate mitigation and adaptation (Scottish Government, 2025c) publication which was published in June 2025 is of relevance to the Project, as noted below.

5.2.4.6 In line with the Scottish Government's Infrastructure Investment Plan (IIP), NPF4 sets out an infrastructure first approach to planning. This means the NPF4 strategy, policies and national developments are aligned to the strategic themes of the IIP, which aim to enable the transition to net zero emissions and environmental sustainability; driving inclusive economic growth; and building resilient and sustainable places.

5.2.4.7 The NPF4 has a 'plan-led approach', which is central to supporting the delivery of Scotland's national outcomes and broader sustainable development goals.

5.2.5 National Policy Statements

5.2.5.1 Scottish Ministers hold executively devolved powers under s.36 of the Electricity Act 1989 and therefore primarily apply relevant Scottish level policies in the determination of consenting applications. However, energy generally remains a UK reserved matter and therefore the UK Government's policy for the delivery of energy infrastructure, as set out within a suite of Energy NPSs, are also relevant consideration.

5.2.5.2 A summary of the main elements of the Overarching National Policy Statement for Energy (EN-1); National Policy Statement for Renewable Energy Infrastructure (EN-3); and the National Policy Statement for Electricity Networks Infrastructure (EN-5) (Department for Energy Security & Net Zero, 2023a; 2023b; 2023c, respectively), which are relevant to the Project are set out in **Volume 3, Appendix 2.1** of the **EIA Report**.

NPS EN-1 2023 Overarching National Policy Statement for Energy

5.2.5.3 NPS EN-1 2023 Overarching National Policy Statement for Energy identifies that in order for the UK to meet its energy requirements now and in the future, large scale energy infrastructure is needed. Paragraph 2.1.3 states that *"To produce the energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness."* In addition, the UK needs to considerably increase its domestic supply of clean energy from renewable sources, which will necessitate associated energy infrastructure. Paragraph 2.3.6 further notes that to transform the energy system and tackle emissions while continuing to ensure secure and reliable supply and affordable bills, we need to increase our supply of clean energy from renewables. The development of large scale energy infrastructure is identified as helping to increase energy security and can help make energy bills more affordable for the consumer.

5.2.5.4 EN-1 goes further, identifying that in order for the UK to meet its legal requirement to be net zero by 2050, it will need considerably more renewable energy, with this mainly being provided by solar and wind development. Paragraph 3.3.20 states that wind and solar are the lowest cost ways of generating electricity, which help to reduce costs and provide a clean and secure source of electricity supply. It goes on to advise that analysis shows *"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar."* Offshore wind is identified as having a crucial role in meeting domestic UK energy demand and helping to reduce the cost of electricity. Paragraphs 3.3.57 to 3.3.63 set out the urgent need for offshore wind and other generating technologies, given the crucial role of electricity as the UK decarbonises its economy.

5.2.5.5 Section 4.2 of EN-1 affords Critical National Priority (CNP) status to offshore wind, establishing a strong policy presumption in favour of consent for offshore wind farms and associated infrastructure. This policy has been referenced in recent decisions by Scottish Ministers and is particularly relevant to the Project's policy context, especially when assessing residual environmental effects and any required derogation under the Habitats Regulations. While CNP is a UK-wide designation, Scotland's NPF4 and the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) adopt a similar approach, identifying offshore wind as a national development priority. These frameworks reinforce the urgency and strategic importance of offshore wind in addressing the climate crisis and delivering economic benefits. As a National Policy Statement, EN-1 must be given significant weight in decision-making for nationally significant infrastructure projects, unless material considerations indicate otherwise.

NPS EN-3 2023 National Policy Statement for Renewable Energy Infrastructure

5.2.5.6 NPS EN-3 2023 National Policy Statement for Renewable Energy Infrastructure states that applications for renewable energy infrastructure need to clearly demonstrate that such infrastructure is well designed and reduces its potential impacts upon its surroundings, especially local landscapes and visual amenity. Overall, EN-3 seeks to ensure renewable energy development and any of its associated infrastructure (including onshore infrastructure) minimise their adverse impacts whilst maximising their potential benefits to a local area.

NPS EN-5 2023 National Policy Statement for Electricity Networks Infrastructure

5.2.5.7 NPS EN-5 2023 National Policy Statement for Electricity Networks Infrastructure further emphasises the need for the UK to have a secure energy supply now and in the future and identifies that renewable energy development, such as offshore wind, is needed in order to achieve a secure energy supply.

5.3 Other Relevant Policies and Considerations

UK Marine Policy Statement

5.3.1.1 The Marine Strategy Framework Directive (MSFD) was transposed into UK law under the Marine Strategy Regulations 2010. The UK Marine Policy Statement explains the high-level aims of the MSFD. National and regional marine plans then break these down into detailed activities.

5.3.1.2 The Marine Policy Statement (MPS) is the framework for marine planning systems. It provides the high-level policy context within which national and sub-national Marine Plans will be developed, implemented, monitored, amended and will ensure appropriate consistency in marine planning across the UK marine area. The MPS also sets the direction for marine licensing and other relevant authorisation systems.

National Marine Plan

5.3.1.3 In March 2015, the Scottish Government published Scotland's National Marine Plan – a Single Framework for Managing our Seas. The National Marine Plan sets out strategic policies for the sustainable development of Scotland's marine resources out to 200nm.

5.3.1.4 The National Marine Plan recognises that sustainable development and the use of the marine environment can provide economic benefits, including growth opportunities, employment, skills development, investment, and trade. Chapter 11 of the National Marine Plan identifies key objectives of the marine planning policy for offshore wind, including:

- sustainable development of offshore wind in the most suitable locations.
- economic benefits from offshore wind, maximised by securing a competitive local supply chain in Scotland.
- contribute to achieving the renewables target to generate electricity equivalent to 100% of Scotland's gross annual electricity consumption from renewable sources by 2020.
- contribute to achieving the decarbonisation target.

5.3.1.5 It is noted that the target to generate electricity equivalent to 100% of Scotland's gross annual electricity consumption from renewable sources by 2020 was narrowly missed. This highlights the increasing importance and urgency for the successful delivery of renewable energy projects, with the National Marine Plan identifying that Scotland's offshore waters provide an opportunity for the further development of an internationally important renewable energy industry.

5.3.1.6 The National Marine Plan also provides specific policies in relation to renewable energy. Policy RENEWABLES 3, 4 and 5 are considered relevant in terms of providing guidance to marine planners and decision makers on matters relating to ensuring the test of sustainable development is assessed on a case-by-case basis, and that applications for offshore wind farms that require marine licences accord with the Marine Licensing Manual and Marine Scotland's Licensing Policy. The RENEWABLES Policy also requires that marine planners and decision makers ensure that renewables energy projects demonstrate compliance with the EIA legislative requirements. The Project's compliance with these requirements is demonstrated through the assessment provided in **Section 6**.

5.3.1.7 The Scottish Government has begun working on the National Marine Plan 2 (NMP2), which will update and replace the existing National Marine Plan. In November 2024 consultation opened on a Planning Position Statement (PPS) (Scottish Government, 2025f) summarising all the work carried out to date on the development of NMP2. Within the document,

stakeholder feedback was consolidated, and information was set out about the latest in the development of high-level objectives and policy ideas for NMP2. Consultation closed in January 2025. At the time of writing, the programme for NMP2 has extended, and it is anticipated that the draft NMP2 will be published in 2026.

Sectoral Marine Plan

5.3.1.8 Scotland's first Sectoral Marine Plan for Offshore Wind Energy (Blue Seas Green Energy) was adopted by the Scottish Government in 2011. In July 2013, Marine Scotland published the Draft Sectoral Marine Plan for offshore wind, wave and tidal energy in Scotland. This publication identified potential future options for commercial scale (potential to generate greater than 100 MW) offshore wind energy developments. Since then, the Scottish Government published the latest Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) in October 2020, which builds upon the work conducted in the development of the 2011 and 2013 plans.

5.3.1.9 The Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) integrates newer policy, regulatory, technological and market developments to create a new strategic planning process. The Sectoral Marine Plan for Offshore Wind Energy aims to contribute towards achieving the climate change policy objectives and targets established by the Scottish and UK Governments by using spatial strategy to inform the seabed licensing process for commercial offshore wind developments in Scottish waters.

5.3.1.10 The Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) also aims to maximise the benefits for Scotland's communities and people whilst keeping adverse effects on other marine users, economic sectors and the environment to a minimum. The Sectoral Marine Plan for Offshore Wind Energy identified 15 final plan options in four regions in Scotland that have the potential to generate several GW of renewable energy. The Sectoral Marine Plan for Offshore Wind Energy has been developed according to the strategic aims of the National Marine Plan which addresses the potential interactions between renewable energy development and other marine users.

5.3.1.11 The proposed offshore wind turbine array for the Project is located within the NE7 OAA of the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a).

Draft Sectoral Marine Plan

5.3.1.12 The Scottish Government's Draft Updated Sectoral Marine Plan (Scottish Government 2025a) sets out an integrated spatial planning framework for delivering projects from the ScotWind and INTOG leasing rounds, while also considering additional capacity for test and demonstration projects. The consultation opened on 30 May 2025 and closed on 22 August 2025.

5.3.1.13 The Draft Updated Sectoral Marine Plan (Scottish Government 2025a) is accompanied by a package of plan-level assessments that provide a high-level, strategic evaluation of potential effects across the defined OAAs (including NE7) and, where relevant, cumulative or in-combination effects:

- Strategic Environmental Assessment (SEA) – identifies likely significant environmental effects of implementing the Draft Plan and reasonable alternatives;
- Habitats Regulations Appraisal – Appropriate Assessment Information Report – considers potential effects on European/Ramsar sites and features from Plan implementation;

- Social and Economic Impact Assessment – assesses potential economic and social effects site-by-site at Option Agreement (OA) level and at regional/national cumulative scales (including shipping, fisheries, ports/harbours, tourism/recreation, etc.);
- Nature Conservation Marine Protected Area (NCMPA) Assessment – considers effects on NCMPAs as part of the sustainability appraisal package; and
- Islands Communities Impact Assessment and Business and Regulatory Impact Assessment– consider island community implications and business/regulatory impacts, respectively, at plan level.

5.3.1.14 These assessments provide high level evaluations of potential environmental, social, and economic effects for each OAA, including NE7, and inform plan level mitigation and evidence priorities to be carried forward at project level.

Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind ambition

5.3.1.15 Building on the Draft Updated Sectoral Marine Plan (Scottish Government 2025a), in June 2025 the Scottish Government also launched a short consultation on a proposal to update their offshore wind ambition to cover the period after 2030, when the current target of 8-11 GW deployment expires (Scottish Government, 2025g). The consultation sought views on a proposed updated ambition of up to 40GW of new capacity (i.e. from 2025) between 2035 – 2040. SPR responded to the consultation on behalf of the Project, providing broad support for the proposed scale of ambition but raising the need to address some ambiguities and highlighting the urgency of confirming the final ambition.

Environmental Compensation Measures Reforms

5.3.1.16 The UK Government's Consultation on Offshore Wind Environmental Compensatory Measures Reforms (UK Government, 2025b) is designed to make the environmental compensation process more flexible and supportive of offshore wind deployment. The proposed reforms are intended to broaden the range of acceptable measures, allowing strategic or alternative compensatory actions, whilst providing clearer guidance to developers and regulators. Secondary legislation and accompanying guidance are expected to be enacted by Q1 2026, with the aim of streamlining the consenting process, reducing Project risk and balancing marine biodiversity protection with the UK's net zero and clean energy ambitions.

5.3.1.17 The Scottish Government's Strategic Compensation Policy for Offshore Wind (2025h) is intended to complement UK-wide reforms by focusing on unlocking barriers to offshore wind deployment, while ensuring marine biodiversity is safeguarded. This policy aims to provide a more coordinated and flexible framework for compensatory measures, allowing developers to contribute to broader, strategic environmental initiatives rather than being constrained by site-specific requirements.

5.3.1.18 The Applicant engaged in this process, contributing to industry-wide responses to both the UK Government's Consultation on Offshore Wind Environmental Compensatory Measures Reforms and the Scottish Government's Strategic Compensation Policy for Offshore Wind.

6. Planning Assessment

6.1 Introduction

6.1.1.1 The starting point for any policy assessment should be a recognition of the established acceptability of the development in principle. This foundation is supported from multiple perspectives, providing a clear basis for further evaluation.

6.1.1.2 The benefits and need for the Project are discussed in **Section 3**.

6.2 Principle of Development

6.2.1.1 The principle of the Project is well-established from multiple perspectives. Notably, the demand for offshore electricity generation is identified in Annex B of NPF4 – National Development Statements of Need (Scottish Government 2023a), under category 3: Strategic Renewable Electricity Generation and Transmission Infrastructure, identifies the following:

"*a) On and off shore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;*

b) New and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132kv or more…"

6.2.1.2 NPF4 confirms that designated National Developments are significant developments of national importance that are needed, and will help to deliver, Scotland's spatial strategy. As a National Development under NPF4, the principle of the Project is established at the national level and does not require further consideration. It is understood that the assessment of the consenting applications for the Project will focus on detailed consideration of predicted impacts and proposed mitigation, as well as the potential need for conditions, rather than the acceptability of the development in principle.

6.2.1.3 The principle of the development gains further strong support from Policy 1 Tackling Climate and Nature Crises within NPF4, which confirms that "significant weight will be given to the global climate and nature crises" when considering all development proposals. Alongside the Project's National Development status, this should be the starting point for the determination of the consenting applications.

6.2.1.4 As detailed in **Section 3 – The Need for and Benefits of the Project**, as a proposed strategic-scale floating offshore wind farm (and associated grid connection) the Project responds directly to relevant climate and energy policy drivers and targets.

6.2.1.5 This Project will deliver up to 3GW of renewable electricity from Scotland's deep waters to the UK's power grid, enough to power millions of homes. By doing so, it will help meet legally binding climate targets, improve energy security, and reduce reliance on imported fuels. It will also support jobs, investment in local communities, which would include local and community socio-economic benefits and the growth of a sustainable energy industry in Scotland. The Project would also support local supply chains, ensure it creates fair employment, provide skill and training opportunities alongside apprenticeship / work experience opportunities and ensure the local benefits provided by the Project are community led.

6.2.1.6 **Section 3** of this Planning Statement identifies the important benefits which would be provided by the Project and the needs case for it. The Project directly aligns with six defined project objectives and is needed to help address the global climate crisis through the provision of 3GW of renewable electricity into the Scottish and wider UK electricity grid. This

also means that the Project is predicted to 'pay back' its GHG emissions contributions within just 7.5 years and then would proceed to provide a net carbon saving.

6.2.1.7 The Project also benefits from broad support in principle under Policy 11 (Energy) of NPF4 and Scotland's National Marine Plan (Scottish Government, 2015), Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) and Draft Updated Sectoral Marine Plan (Scottish Government, 2025a) for offshore wind energy, provided that it does not result in any unacceptable significant effects. The OAA for the Project is located within Plan Option NE7 as designated within the Sectoral Marine Plan for Offshore Wind Energy and retained in the Draft Updated Sectoral Marine Plan. The alignment of the Project with NPF4, the National Marine Plan, and both the adopted and draft updated Sectoral Marine Plan underscores its policy support, provided that environmental effects are appropriately managed and compensated, thereby maintaining its positive contribution towards achieving net zero.

6.2.1.8 On this basis, the principle of development for the project is clearly established in policy terms.

6.3 Environmental effects of the Project

6.3.1.1 This Section provides the planning assessment of the Project's offshore elements and demonstrates how the Project is in accordance with relevant key planning and National Marine Plan policy. The section comprises a series of tabular assessments which summarise and consider the key predicted effects from the Project against relevant policy requirements. For ease and to avoid repetition, environmental aspects have been grouped thematically with the impact assessments and embedded environmental measures for the corresponding chapters noted in the relevant table.

6.3.1.2 Where likely significant adverse effects are anticipated as a result of the Project, these results are identified in the context of supporting embedded environment measures. This section balances these effects against the overall need for the Project.

6.3.1.3 A summary of the key policy and legislation against which the Project has been assessed is outlined in **Volume 1, Chapter 2: Legislative and Policy Context** and **Volume 3, Appendix 2.1** of the **EIA Report**.

6.3.1.4 This section is structured as follows:

- **Section 6.4: The Marine Environment**
  - Marine Geology, Oceanography and Physical Processes
  - Underwater Noise
  - Electromagnetic Fields (EMF)
  - Marine Water and Sediment Quality
- **Section 6.5: Marine Ecology, Biodiversity and Ornithology**
  - Benthic, Epibenthic and Intertidal Ecology
  - Marine Mammals
  - Fish Ecology
  - Offshore and Intertidal Ornithology
- **Section 6.6: Marine Human Activities and Use**
  - Commercial Fisheries

- Shipping and Navigation
- Infrastructure and Other Marine Users
- Civil and Military Aviation

- **Section 6.7: Cultural and Visual Environment**
  - Marine Archaeology and Cultural Heritage
  - Seascape, Landscape and Visual
- **Section 6.8: Climate Context**
  - Climate Resilience
  - Greenhouse Gases
- **Section 6.9: Socio-Economic Considerations**

6.4 The marine environment

6.4.1 Marine environment combined assessment - marine geology oceanography, physical processes, water and sediment quality

Table 6.1 Marine environment combined assessment - marine geology oceanography, physical processes, water and sediment quality

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 4 Co-existence • GEN 8 Coastal Process and Flooding • GEN 9 Natural Heritage • GEN 10 Invasive non-native species • GEN 12 Water Quality and Resources • GEN 13 Noise • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • WILD FISH 1 • CABLES 1 • CABLES 2 • REC & TOURISM 5 Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) • Draft Updated Sectoral Marine Plan (2025) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 10 Coastal Development

	Policy assessment
Impact assessment	**Marine geology, oceanography and physical process** **Volume 1, Chapter 6: Marine Geology, Oceanography and Physical Processes** has identified **no significant** effects resulting from the Project, including no transboundary effects. In the construction and decommissioning stages of the Project, Minor Adverse (**Not Significant**) effects were only identified on the coast from the potential impacts of the landfall(s). During the operational stage, Minor Adverse (**Not Significant**) effects are identified on the coast due to potential changes to coastal morphology and on designated frontal systems due to the potential changes the Project could cause to these. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects respectively for marine geology, oceanography and physical processes. **Underwater noise** **Volume 1, Chapter 8 Underwater Noise** of the **EIA Report** informs the assessments of the following chapters: • **Volume 1, Chapter 10: Benthic, Epibenthic and Intertidal Ecology:** Minor Adverse (**Not Significant**) effects identified from underwater noise for all stages of the Project. • **Volume 1, Chapter 11: Marine Mammals**: Effects from underwater noise identified as ranging between Negligible (**Not Significant**) to Minor Adverse (**Not Significant**) effects, with the former being the majority of effects identified, across all stages of the Project. • **Volume 1, Chapter 13: Fish Ecology**: Effects from underwater noise identified as ranging between Negligible (**Not Significant**) to Minor Adverse (**Not Significant**) effects, with the latter being the majority of effects identified, across all stages of the Project. • **Volume 1, Chapter 14: Commercial Fisheries:** Minor Adverse (**Not Significant**) effects identified for all stages of the Project due to disrupting commercially important fish stocks through disturbance effects. **Electromagnetic fields (EMF)** The implications of the EMF described in **Volume 1, Chapter 9: Electromagnetic Fields** of the **EIA Report**, where these may be perceptible to ecological receptors are described and assessed as relevant in the following chapters and only during the O&M stage of the Project: • **Volume 1, Chapter 10: Benthic, Epibenthic and Intertidal Ecology:** Negligible to Minor Adverse (**Not Significant**) effects on shellfish; • **Volume 1, Chapter 11: Marine Mammals:** Negligible (**Not Significant**) effects on marine mammal receptors; • **Volume 1, Chapter 12: Offshore and Intertidal Ornithology:** Direct effects not identified and EMF effects are combined with other O&M stage impacts; • **Volume 1, Chapter 13: Fish Ecology:** Minor (**Not Significant**) effects on all fish receptors; • **Volume 1, Chapter 14: Commercial Fisheries:** Relies on the findings of **Volume 1, Chapter 10: Benthic, Epibenthic and Intertidal Ecology** and **Volume 1, Chapter 13: Fish Ecology**. There would therefore be only Negligible to Minor Adverse (Not Significant) effects on commercial fisheries from EMF, in terms of how generated EMF would disrupt local fish species; and

	Policy assessment
	• **Volume 1, Chapter 23 Terrestrial Ecology and Ornithology:** Negligible (**Not Significant**) effects on freshwater fish. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects respectively for EMF. **Marine water and sediment quality** **Volume 1, Chapter 7: Marine Water and Sediment Quality** concludes that effects resulting from the Project would be **Not Significant**, including no transboundary effects. Potential effects resulting from all stages of the Project are confined to being Minor (**Not Significant**) effects. Examples of receptors that would potentially experience Minor (**Not Significant**) effects include, but are not limited to, marine coastal and offshore water quality and marine sediment quality. The Project would result in no residual significant effects on marine water and sediment quality receptors. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects respectively on marine water and sediment quality.
Embedded environmental measures	A range of environmental measures within **Volume 3, Appendix 5.2** of the **EIA Report** that relate to the marine environment are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. The following embedded environmental measures are relevant to the Marine Environment as informed by: • **Volume 1, Chapter 6: Marine Geology, Oceanography and Physical Processes:** M-028, M-054, M-106, M-120 and M-121. • **Volume 1, Chapter 8 Underwater Noise:** M-032, M-114 and M-120. • **Volume 1, Chapter 9: Electromagnetic Fields:** M-001, M-021, M-028, M-054, M-057 and M-058. • **Volume 1, Chapter 7: Marine Water and Sediment Quality**: M-033, M-049, M-054, M-059, M-060, M-061, M-062, M-064, M-106, M-121 and M-122.
Planning assessment	**Marine geology, oceanography and physical process** Relevant policies set out criteria for the Project to protect geological assets and the water environment from adverse impacts, alongside requiring suitable enhancement measures as required to address potential impacts. The Project has been well sited and designed to ensure it would not compromise important geodiversity and marine geology sites, with its landfall(s) carefully chosen to not compromise any sites designated for their nature conservation value (which may include geodiversity). The Project includes for a number of environmental measures, which are designed to minimise its potential effects on marine geology and oceanography, especially during the construction and decommissioning stage of the Project. The construction stage especially has a significant number of environmental measures. Examples such as the **Volume 4: Outline Construction Method Statement (CMS)** would ensure the correct implementation of the other environmental measures and ensuring construction is undertaken in accordance with good

	Policy assessment
	practice construction methods. The **Volume 4: Outline Environmental Management Plan (EMP)** would ensure the potential for environmental effects resulting from the Project would be appropriately managed, including the careful management and mitigation of effects upon marine geology, oceanography and physical processes. The acceptability of the Project's location and its resulting design, which includes for the environmental measures results in a lack of significant effects upon the marine geology, oceanography and physical process receptors. **Underwater noise** Relevant policies set out criteria for the Project to ensure it would not generate unacceptable adverse impacts due to the noise created by the Project on the marine environment. As has been identified by the relevant supporting EIA Chapters, the potential effects of the Project resulting from underwater noise is minimal, resulting in primarily Negligible (**Not Significant**) effects, with few Minor Adverse (**Not Significant**) effects across all stages of the Project. This demonstrates the well designed nature of the Project and the efficacy of the environmental measures that have been considered and would be applied to ensure such minimal effects are achieved. The Project is also committed to ensuring its potential effects on identified receptors is monitored and addressed as needed through the supporting **Volume 4: Outline Marine Mammal Mitigation Protocol** and **Volume 4: Outline Construction Method Statement** of the **EIA Report**. **EMF** Relevant policies set out criteria for the Project to ensure it would not generate unacceptable adverse impacts from any EMF generated by the Project on the marine environment. The Project has been carefully designed and sited to ensure the potential effects from EMF are minimal. This can be seen with the greatest effect identified within the relevant chapters being a Minor (**Not Significant**) effect on all fish receptors, which has been achieved through the use of supporting environmental measures. The environmental measures for a Cable Burial Risk Assessment and adopting an approach of burying as much of the cabling as possible (where feasible), would aid in keeping potential EMF effects low. Where cabling cannot be buried, it would be supported by cabling protection, such as through the use of rock placement and/or concrete mattressing and/or nature-inclusive solutions (where feasible). By ensuring the Project would keep its potential effects low, including cumulative effects, the Project ensures it would not harm ecological receptors on the seabed or in the water column. **Marine water and sediment quality** Relevant policies set out criteria for the Project to protect the marine environment from unacceptable adverse impacts as well as to deliver proportionate marine enhancement. No significant effects would result from the Project on marine water and sediment quality. This is in part due to the Project location, the consideration given to its design and to the embedded environmental measures. Combined, these ensure the Project would not result in effect greater than Minor Adverse and **Not Significant**. A number of the environmental measures, such as **Volume 4, Marine Pollution Contingency Plan (MPCP)**, are currently outline documents, which would be

	Policy assessment
	further updated into complete, final version prior to the commencement of development. This would aid in ensuring potential effects are kept to a minimum and ensure such environmental measures better reflect the nature of the marine environment once development would commence and throughout the Project. Related to this topic are a significant number of environmental measures that would seek to monitor the Project to ensure it does not cause unforeseen or greater effects to marine waters, especially regarding mitigating the potential for pollution to occur and quickly addressing it should unforeseen pollution events occur. The Project is also keen to ensure it monitors its potential effects throughout its lifetime to ensure it does not compromise marine water and sediment quality, and unforeseen events or effects would be carefully managed and rectified, should they occur. **Conclusion** It is therefore considered that the Project would be in accordance with all policies relevant to the Marine Environment associated chapters, which are policies GEN 1, GEN 4, GEN 8, GEN 9, GEN 10, GEN 12, GEN 13, GEN 17, GEN 18, GEN 21, WILD FISH 1, CABLES 1, CABLES 2 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and be in accordance with Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a), Policy 1 Tackling Climate and Nature Crises and Policy 10 Coastal Development of the NPF4. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.5 Marine ecology and biodiversity

6.5.1 Marine ecology and biodiversity combined assessment - benthic, epibenthic and intertidal ecology, marine mammals and fish ecology

Table 6.2 Marine ecology and biodiversity combined assessment - benthic, epibenthic and intertidal ecology, marine mammals and fish ecology

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 8 Coastal Process and Flooding • GEN 9 Natural Heritage • GEN 10 Invasive Non-native Species • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • WILD FISH 1

	Policy assessment
	• CABLES 1 • CABLES 2 • FISHERIES 1 • FISHERIES 2 • FISHERIES 3 • REC & TOURISM Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 3 Biodiversity • Policy 4 Natural Places
Impact assessment	**<u>Benthic, epibenthic and intertidal ecology</u>** **Volume 1, Chapter 10: Benthic, Epibenthic and Intertidal Ecology** of the **EIA Report** has assessed the effects resulting from the Project, including transboundary effects. No Significant effects are identified. However, the temporary disturbance of the seabed as a result of the construction and O&M stages would potentially cause Minor (**Not Significant**) to Moderate (**Potentially Significant**) effects, though the magnitude of such effects would be low, and low to negligible respectively. The temporary disturbance of the seabed by various means and the potential loss of habitat and creation of areas of hard substrate means that there is a potential for residual Moderate (**Potentially Significant**) effects upon subtidal habitats and species, habitats of conservation importance and species of conservation importance during the Project's O&M stage. Remaining effects identified across all stages of the Project are concluded as either Minor (**Not Significant**) or Negligible (**Not Significant**) in nature. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** states that no inter-related effects of greater significance compared to the effects considered within **Volume 1, Chapter 10: Benthic, Epibenthic and Intertidal Ecology** of the **EIA Report** were identified for land use receptors during the construction, O&M, and decommissioning stages of the Project with **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identifying no significant potential cumulative effects with regard to benthic, epibenthic and intertidal ecology. **<u>Marine mammals</u>** **Volume 1, Chapter 11: Marine Mammals** of the **EIA Report** has identified **no significant** effects as a result of the Project, including no transboundary effects. The majority of effects identified across all of the stages of the Project were identified as Negligible (**Not Significant**). Minor (**Not Significant**) effects are identified from activities within the construction and O&M stages of the Project. This is primarily due to activities associated with UXO during the construction stage and displacement and entanglement in lines/cables during the O&M stage, though all marine mammals could potentially be affected by the later. The magnitude of the majority of potential effects is identified as low or negligible. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** states that no inter-related effects of greater significance compared to the effects considered within

	Policy assessment
	Volume 1, Chapter 11: Marine Mammals of the **EIA Report** were identified for marine mammal receptors during the construction, O&M, and decommissioning stages of the Project. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identifies no significant potential cumulative effects. **<u>Fish ecology</u>** **Volume 1, Chapter 13: Fish Ecology** of the **EIA Report** has identified **no significant** effects resulting from the Project, including no transboundary effects. During the construction stage of the Project, Minor (**Not Significant**) effects are identified on all or selective fish receptors as a result of activities which include pre-construction seabed preparation works; temporary habitat loss and / or disturbance; temporary localised increases in suspended sediment concentrations and smothering; effects as a result of underwater noise, vibration and particle motion, UXO clearance; the release of sediment contaminants; changes in water quality; and potential impacts on designated sites. During the O&M stage of the Project, Minor (**Not Significant**) effects are identified on all or selective fish receptors as a result of activities which include: temporary to long-term habitat loss and disturbance; the introduction / colonisation of hard substrate; temporary localised increases in suspended sediment concentrations and smothering; effects arising from underwater noise, vibration and particle motion; EMF effects arising from cables and heat effects arising from cables. In addition, the assessment concludes that there will be no significant effects as a result of direct and indirect seabed disturbances leading to the release of sediment contaminants; secondary entanglement risk; and potential impacts on designated sites. During the decommissioning stage of the Project, Minor (**Not Significant**) effects are identified on all or selective fish receptors due to temporary habitat loss and / or disturbance; temporary localised increases in SSC and smothering; direct and indirect seabed disturbances leading to the release of sediment contaminants; changes in water quality; and potential impacts on designated sites. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects respectively with regard to fish ecology.
Embedded environmental measures	A range of environmental measures within **Volume 3, Appendix 5.2** that relate to Marine Ecology and Biodiversity are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. The following embedded environmental measures are relevant to Marine Ecology and Biodiversity as informed by: • **Volume 1, Chapter 10: Benthic, Epibenthic and Intertidal Ecology:** M-028, M-033, M-049, M-054, M-055, M-056, M-102, M-105, M-106, M-114, M-120, M-121 and M-122. • **Volume 1, Chapter 11: Marine Mammals:** M-028, M-032, M-033, M-039, M-054, M-057, M-105, M-106, M-114, M-115, M-120, M-121, M-122, M-186 and M-187. • **Volume 1, Chapter 13: Fish Ecology:** M-028, M-029, M-032, M-033, M-049, M-054, M-055, M-056, M-057, M-059, M-060, M-061, M-062, M-064, M-102, M-105, M-106, M-114, M-120, M-121 and M-122.
Planning assessment	**<u>Benthic, epibenthic and intertidal ecology</u>** Relevant policies set out criteria for the Project to protect benthic, epibenthic and intertidal ecology from unacceptable adverse impacts as well as to deliver proportionate biodiversity/marine enhancement.

	Policy assessment
	The Project would be designed and sited carefully to ensure it would result in as few potential effects as possible on identified benthic, epibenthic and intertidal ecology receptors. The avoidance of key sensitive habitats (where known) underpinned the design of the Project. The Project would further refine the siting of its elements through pre-construction surveys to ensure it would avoid areas containing any important benthic, epibenthic and intertidal ecology receptors that may have been previously unidentified. It is acknowledged that the Project has the potential to cause residual Moderate (**Potentially Significant**) effects during the O&M stage due to causing a disturbance in the seabed. The extensive range of environmental measures associated with the Project ensure that it would be highlight unlikely to result in the creation of significant residual effects on benthic, epibenthic and intertidal ecology receptors, with each stage of the Project being overseen by various environmental measures that ensure it would minimise its potential effects. The **Volume 4: Outline Project Environmental Monitoring Programme** and Cable Burial Risk Assessment (CBRA) would both aid in ensuring the effects identified do not become significant, with these ensuring seabed sediment is disturbed only when necessary and in a controlled manner. The Project would also be supported by the implementation of **Volume 4: Outline Offshore INNS Management Plan**, which would aid in ensuring the Project would avoid or minimise the introduction and spread of Invasive Non-Native Species (INNS) to the local marine environment. Such environmental measures also aid in ensuring the Project provides enhancement to local benthic, epibenthic and intertidal ecology receptors. It is considered that the Project has demonstrated it has accurately assessed what its potential effects would be and identified mitigation that works to minimise such effects. The Project is supported by a **Nature Positive Plan (NPP)**, which outlines the strategic framework through which further biodiversity enhancement will be identified, developed, implemented, monitored, and reported across both the onshore and offshore components of the Project. The offshore biodiversity enhancement measures proposed for the Project by the NPP relate to the emerging status of floating offshore wind technology and the relatively novel ecological interventions available in the marine environment. Many of the technologies currently under consideration are innovative and still in the early stages of development or testing. The Project could potentially utilise ecofriendly cable protection mattresses, in areas where cable burial is found to not be feasible. The NPP also identifies the potential use of scour protection reef-type concrete blocks. These eco-engineered concrete blocks are designed to stabilise the seabed around structures connected to the seabed while simultaneously enhancing marine biodiversity, especially when compared with conventional rock armour designs. The third offshore biodiversity enhancement concept that could be applied to the Project post-consent would be the development and installation of standalone reef structures designed to create artificial habitats and promote marine biodiversity. Finally, the Project could also potentially utilise seaweed farming to aid in the growth of nature seaweed species and create underwater habitats and the Project could also provide offsite nature enhancement. **Marine mammals** Relevant policies set out criteria for the Project to protect marine mammals from unacceptable adverse impacts, including the enhancement of the marine environment and its habitats. The Project has been sited and designed to reduce its potential effects on marine mammals. The location of cabling associated with the Project would be constructed in carefully considered areas to ensure they would cause little disturbance to marine mammals and would be of a sufficient depth to avoid re-emergence. Furthermore,

	Policy assessment
	associated vessel travel trips associated with the Project across all of its stages would be managed to ensure vessels carried out required works in a careful manner that reduced the risks to marine mammals. The adoption of these environmental measures means that the majority of potential effects identified from the Project across its stages, are Negligible (**Not Significant**) and that no significant effects are identified. The breadth and scale of the environmental measures, alongside the detailed design and assessment work associated with the Project, is considered to demonstrate that the Project has considered its potential effects and maximised its opportunities to mitigate them. For example, the **Volume 4: Outline Marine Mammal Mitigation Protocol** would ensure the risk of injury to marine mammals from piling, UXO clearance, and pre-construction surveys is minimised. **Fish ecology** Relevant policies set out criteria for the Project to protect fish species and habitats from unacceptable adverse impacts as well as to deliver proportionate relevant enhancement to offset adverse impacts. The construction, O&M and decommissioning of the Project would have potentially Minor (**Not Significant**) effects on a wide range of fish receptors. The level of effects identified reflects the carefully sited and well-designed nature of the Project. The WTGs and array cables would be sited to minimise potential seabed disturbance and impacts upon local and migrating fish species. Disturbances caused during the construction and decommissioning stages of the Project would be temporary in nature, though it is acknowledged that each of these stages would run for a number of years. Identified environmental measures would help to ensure that the potential effects from all stages of the Project are mitigated to be Minor (**Not Significant**) or better in reality. Mitigation documentation such as the **Volume 4: Outline Offshore Invasive Non-Native Species Management Plan**, **Volume 4: Outline Piling Strategy**, **Volume 4: Outline Construction Method Statement** and **Volume 4: Outline Environmental Management Plan** would all be designed to ensure the potential effects to fish species are minimised, especially during the construction of the Project, with management and oversight processes in place to address unforeseen effects. This would also include the minimising of the likelihood of the Project resulting in increasing the levels of invasive species within the local marine environment. Such environmental measures also ensure the Project would not compromise the quality of the local marine environment, ensuring it is still a place for fish species to thrive within. The Project has therefore demonstrated through its accurate assessment of potential effects and use of supporting environmental measures that it has endeavoured to keep its potential effects low on fish receptors. **Conclusion** It is therefore considered that, in respect of marine ecology interests, the Project would be in accordance with policies GEN 1, GEN 3, GEN 4, GEN 9, GEN 10, GEN 17, GEN 18, GEN 21, WILD FISH 1, CABLES 1, CABLES 2, FISHERIES 1, FISHERIES 2, FISHERIES 3 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and in accordance with the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1 Tackling Climate and Nature Crises, 3 Biodiversity and 4 Natural Places of the NPF4 (2023). Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.5.2 Ornithology

Table 6.3 Offshore and intertidal ornithology

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • CABLES 1 • CABLES 2 • CABLES 4 • REC & TOURISM 5 Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 3 Biodiversity • Policy 4 Natural Places • Policy 11 Energy
Impact assessment	**Volume 1, Chapter 12: Offshore and Intertidal Ornithology** of the **EIA Report** has identified Moderate Adverse **(Significant) residual** effects resulting from the Project on Guillemot species during the O&M stage, though no transboundary effects would occur. The majority of potential effects that would result from the Project are identified as being Negligible Adverse (**Not Significant**) or Minor Adverse (**Not Significant**). The **Report to Inform Appropriate Assessment (RIAA)** has concluded that Adverse Effects on Site Integrity (AEoSI) cannot be ruled out on a number of designated sites, species and features (Special Protection Areas (SPA)) as identified within the supporting **Derogation Case**. **Section 6.10** of this Planning Statement considers the implications of the Habitat Regulations and the submitted Derogation Case in greater detail, including consideration of the proposed minimum rotor blade tip air gap. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** states that no inter-related effects of greater significance compared to the effects considered within **Volume 1, Chapter 12: Offshore and Intertidal Ornithology** of the **EIA Report** were identified for land use receptors during the construction, O&M, and decommissioning stages of the Project. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identifies a number of potentially significant cumulative effects from: • distributional response effects during the O&M stage in relation to guillemot, razorbill and puffin; • collision risk during the O&M stage in relation to kittiwake and great black-backed gull; and • combined effects during the O&M stage in relation to kittiwake and gannet.

	Policy assessment
Embedded environmental measures	A range of environmental measures within **Volume 3, Appendix 5.2** of the **EIA Report**, which relate to offshore and intertidal ornithology are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these embedded environmental measures include, but are not limited to, reducing environmental impacts of the landfall(s) through the use of a trenchless solution to install ducts at landfall(s). The following environmental measures are relevant to this topic: M-032, M-033, M-038, M-046, M-049, M-056, M-106, M-120, M-121 and M-122.
Planning assessment	Relevant policies set out criteria for the Project to protect ornithological species and habitats from unacceptable adverse impacts as well as to deliver proportionate enhancement. The Project would be design and siting to ensure its potential effects on birds, and their habitats are minimised. No significant effects would arise from the Project alone. This planning assessment doesn't address the consideration of the Project under the relevant habitat regulation because it's dealt with in **Section 6.10** below, which goes into detail on how the supporting Derogation Case addresses the requirements of the habitat regulations. Potential significant cumulative effects have been identified that would result from the O&M stage of the Project. The reason for the significant effects conclusions is primarily due to the pre-existing scale of predicted impact from other developments, rather than due to the Project's contribution to the Cumulative Effects Assessment (CEA). The Project has provided potential options for compensation with respect to kittiwake, guillemot, razorbill, puffin and gannet as presented within the Derogation Report should ministers be minded consenting the Project. For great black-backed gull, the Project has proposed further monitoring at this stage to better understand the actual impacts that would result from the Project alone, due to concerns that compensating for great black-backed gull may pose in relation to their impacts on other seabirds. It is therefore considered that whilst potential significant cumulative effects could occur, the Project would be committed to better understanding such effects and offers mitigation to help reduce these potential cumulative effects, which would also aid in ensuring other potential effects on guillemot would be acceptable. Broadly, the potential effects identified resulting from the Project alone, besides its potential cumulative effects, are already minimised, with the majority of effects ranging between Negligible Adverse (**Not Significant**) or Minor Adverse (**Not Significant**), though it is noted that there would be potentially Moderate Adverse (**Significant**) residual effects on Guillemot species. This highlights the efficacy of the design, siting and supporting environmental measures associated with the Project. Potential effects from construction and O&M activities would be continued to be assessed and monitored through ongoing environmental monitoring as required by the supporting **Volume 4: Outline Project Environmental Monitoring Programme**. The **Volume 4: Outline Environmental Management Plan**, when progressed to a final version, would include a Chemical Risk Assessment to identify, evaluate and mitigate potential environmental and health risks associated with the use, storage and disposal of hazardous substances during O&M and decommissioning stages of the Project. When combined, this would all work to ensure the Project accurately identifies its potential effects on bird species and appropriately mitigates them to acceptable levels as much as is feasible. The Project would also not result in compromising the coast through the development of its landfalls, ensuring it continues to act as an important habitat for bird species. The planning assessment concludes that the Project would be in accordance with policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 17, GEN 18, GEN 21, CABLES 1,

	Policy assessment
	CABLES 2, CABLES 4 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and be in accordance with the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1 Tackling Climate and Nature Crises, 3 Biodiversity, 4 Natural Places and 11 Energy of NPF4. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.6 Marine human activities and use

6.6.1 Commercial fisheries

Table 6.4 Commercial fisheries

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 9 Natural Heritage • GEN 10 Invasive Non-native Species • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • WILD FISH 1 • CABLES 1 • CABLES 2 • FISHERIES 1 • FISHERIES 2 • FISHERIES 3 • DEFENCE 1 • DEFENCE 3 • REC & TOURISM 5 Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises
Impact assessment	**Volume 1, Chapter 14: Commercial Fisheries** of the **EIA Report** has identified **Significant** effects resulting from the Project, though no significant transboundary effects are identified. Whilst many of the effects identified on commercial fisheries are identified as being Minor Adverse (**Not Significant**), the Project would result in a number of Moderate

	Policy assessment
	Adverse (**Significant**) effects during all of the Project's stages. These effects include: a reduction in accessing established fishing grounds within the OAA and export cable corridor in terms of UK demersal otter trawl and UK demersal seine receptors; the resultant displacement of fishing activities leading to gear conflict; and increased fishing pressure on adjacent grounds. No significant inter-related effects of greater significance compared to the effects considered alone were identified for commercial fisheries receptors from the construction, O&M and decommissioning of the Project. Significant cumulative effects have been identified in relation to potential effects of the Project on commercial fisheries from construction, O&M, and decommissioning of the Project due to multiple floating offshore wind farm developments leading to an incremental reduction in availability of fishing grounds, coupled with implementation of management measures within **NCMPA**.
Embedded environmental measures	A range of environmental measures within **Volume 3, Appendix 5.2** of the **EIA Report** that relate to commercial fisheries are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these environmental measures include, but are not limited to, establishing statutory Safety Zones and issuing clear Notices to Mariners and Kingfisher Bulletins so fishers have timely and accurate information, preparing a **Volume 4: Outline Vessel Management and Navigational Safety Plan** to coordinate the Project's vessel traffic and installing a dedicated Company Fisheries Liaison Officer (FLO). The application is accompanied by an FMMCP as referenced below (M-048), the following additional embedded measures are also relevant to this aspect: M-029, M-030, M-031, M-038, M-039, M-049, M-050, M-051, M-052, M-053, M-054, M-106, M-120, and M-122.
Planning assessment	NE7 was identified as a suitable area for offshore wind development through an iterative spatial selection and refinement process which included strategic-level assessments, including on fisheries interests, and stakeholder engagement, including with fisheries groups. As a direct result of consultation feedback, the spatial extent of NE7 was reduced in the final Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), which was subsequently adopted by the Scottish Ministers, specifically to reduce otherwise potential impacts on important fishing grounds. On this basis, NE7 was included in Crown Estate Scotland's ScotWind leasing round (2020) and NE7 was retained within the Scottish Government's Draft Updated Sectoral Marine Plan (Scottish Government 2025a). The strategic decision to undertake offshore wind leasing in Plan Option NE7, which forms the Project's OAA, was taken at an earlier stage by the Scottish Ministers prior to NE7 being awarded to the Applicant. This should be recognised within the determination of the offshore consenting applications for the Project. In turn, the Project needs to work within the spatial constraints of NE7 and consider whether potential significant impacts can be further mitigated at project level whilst ensuring that the Project remains viable and continues to achieve all of its project objectives as detailed in **Section 3.4**. Relevant policies set out criteria for the Project to protect commercial fisheries and associated farmed habitats from unacceptable adverse impacts as well as to demonstrate how the Project has minimised any adverse effects.

	Policy assessment
	It is acknowledged that the Project would cause disruption to local commercial fisheries that rely on the being able to fish within the OAA and export cabling corridors, especially with regard to UK demersal otter trawl and UK demersal seine fishing associated activities. It is also identified that this would cause a cascading effect, where commercial fisheries seek to fish in other areas in order to address the loss of access to established fishing grounds. However, the Project would seek to ensure as little established fishing grounds are lost as possible. In support of this, the construction stage of the project would utilise a detailed phasing strategy over the 12 years of construction, which would outline how the construction of the Project would be phased in order to further reduce potential effects upon commercial fishery activities. Advance warning and accurate location details of construction, maintenance and decommissioning operations, associated Safety Zones and advisory passing distances, will be given via Notices to Mariners and Kingfisher Bulletins to ensure the Project does not pose a threat to commercial fishery associated vessels at any stage. This would be further supported by a Safety Zone Statement and **Volume 4: Outline Vessel Management and Navigational Safety Plan**, which would further aid in ensuring the Project does not compromise commercial fishery associated vessels. The **Volume 4: Outline Fisheries Mitigation, Monitoring and Communication Plan** would continue to be developed in accordance with consultation with affected commercial fisheries operators. The final version of this document would identify mitigation measures to further limit the potential effects of the Project. These endeavours would be supported by fisheries working/liaison groups to ensure affected fishing communities can communicate with the Applicant and inform the Project. Further additional mitigation measures (M-218, M-219, M-220, M-221 and M-222) have been proposed which include: • establishing a fisheries fund; • exploring the coexistence of fishing activities and the operation of the Project within the OAA; • establishing a buffer between the Project and the Golden Eagle to Claymore Oil Export pipeline; and • ongoing monitoring of the Project's effects upon commercial fisheries with opportunities for intervention/further mitigation. The planning assessment concludes that the Project would be in accordance with policies GEN 1,GEN 2, GEN 3, GEN 4, GEN 9, GEN 10, GEN 17, GEN 18, GEN 21, WILD FISH 1, CABLES 1, CABLES 2, FISHERIES 1, FISHERIES 2, FISHERIES 3, DEFENCE 1, DEFENCE 3 and REC & TOURISM 5 of Scotland's National Marine Plan (2015), as well as the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and Policy 1 Tackling Climate and Nature Crises of NPF4. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.6.2 Shipping and navigation

Table 6.5 Shipping and navigation

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle, • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 9 Natural Heritage • GEN 10 Invasive Non-native Species • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • WILD FISH 1 • CABLES 1 • CABLES 2 • FISHERIES 1 • FISHERIES 2 • FISHERIES 3 • DEFENCE 1 • DEFENCE 3 • REC & TOURISM 5 Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises
Impact assessment	**Volume 1, Chapter 15: Shipping and Navigation** of the **EIA Report** which includes a **Volume 3, Appendix 15.1: Navigational Risk Assessment** has identified **No Significant** effects resulting from the Project, including no transboundary effects. The assessment has considered the potential for the Project to increase the potential for vessel collision; reduce the access to local ports and harbours by other users and loss of station as a result of all stages of the Project, with further consideration given to the effects arising from the creation of new structures during the O&M stage; a reduction in keel clearance and anchor interaction due to mooring lines and cabling. Impacts upon emergency response capability is also assessed. In all of the above cases, the assessment concludes that the effects identified would be either **Tolerable with Mitigation** or **Broadly Acceptable**. **Volume 1, Chapter 32: Inter-Related Effects** and **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** also conclude no significant inter-related or cumulative effects respectively.
Embedded environmental measures	A range of environmental measures within **Volume 3, Appendix 5.2** of the **EIA Report** that relate to shipping and navigation are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these embedded environmental measures include but are not limited to, ensuring advanced warning is given regarding the construction, maintenance and decommissioning operations to ensure other vessels know about the Project and its

	Policy assessment
	activities, the appropriate marking of the Project on Admiralty and aeronautical charts and compliance with regulatory expectations on moorings for floating wind and marine devices. The following embedded environmental measures are relevant to this aspect: M-029, M-030, M-031, M-033, M-038, M-039, M-040, M-043, M-044, M-045, M-046, M-047, M-048, M-049, M-054, M-106, M-118, M-120 and M-122.
Planning assessment	Relevant policies set out criteria for the Project to protect shipping and navigation receptors from unacceptable adverse impacts as well as to demonstrate how the Project has minimised any adverse effects. The Project in terms of its design and siting would be carefully considered to ensure it would not require the rerouting of commercial shipping routes in a manner that would cause harm to the viability of such commercial shipping routes. The associated environmental measures would work to ensure the potential effects from the Project on shipping and navigation receptors are Tolerable with Mitigation or Broadly Acceptable, with the majority of potential effects identified being Broadly Acceptable. The Project would ensure its construction, O&M and decommissioning activities are well known in advance by vessels operating within the North East sea region of Scotland. The **Volume 4: Outline Construction Method Statement** would ensure construction activities are carried out in a manner that ensures they do not disrupt other vessels, including the careful management of vessels associated with the Project. The Project would be sufficiently lit during its construction and O&M stages through the use of a **Volume 4: Outline Lighting and Marking Plan** to ensure third party vessels can accurately identify the Project. A Decommissioning Programme would be used during the decommissioning stage of the Project to ensure it is decommissioned appropriately and in a manner that is safe and not disruptive to marine vessels navigating and operating within the local area. Given the embedded environmental measures proposed as part of the Project and informed by the lack of significant (unacceptable) effects it can be concluded that the Project would be in accordance with policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 9, GEN 10, GEN 17, GEN 18, GEN 21, WILD FISH 1, CABLES 1, CABLES 2, FISHERIES 1, FISHERIES 2, FISHERIES 3, DEFENCE 1, DEFENCE 3 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and be in accordance with the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and Policy 1 Tackling Climate and Nature Crises of the NPF4. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.6.3 Infrastructure and other marine users

Table 6.6 Infrastructure and other marine users

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 6 Historic Environment • GEN 7 Landscape/ Seascape • GEN 9 Natural Heritage • GEN 10 Invasive Non-native Species • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • WILD FISH 1 • CABLES 1 • CABLES 2 • FISHERIES 1 • FISHERIES 2 • FISHERIES 3 • DEFENCE 1 • DEFENCE 3 • TRANSPORT 1 • TRANSPORT 2 • TRANSPORT 4 • TRANSPORT 6 • REC & TOURISM 5 Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 11 Energy • Policy 14 Design, Quality and Place • Policy 18 Infrastructure First
Impact assessment	**Volume 1, Chapter 18: Infrastructure and Other Marine Uses** of the **EIA Report** has identified **no significant** effects, including no transboundary effects. The majority of effects upon potential receptors across all of the stages of the Project are confined to being Minor (**Not Significant**). However, during the construction and O&M stages of the Project, Moderate (**Potentially Significant**) effects could occur on the Hywind Scotland Pilot Park due to the Project having the potential to cause temporary obstruction to offshore export cables and other existing cable related infrastructure. Residual Minor (**Not Significant**) effects have been identified on Hywind Scotland Pilot Park during the construction and O&M stages of the Project.

	Policy assessment
	Volume 1, Chapter 32: Inter-Related Effects of the **EIA Report** concluded no significant inter-related effects would occur. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identifies the potential for a number of Minor Adverse (**Not Significant**) cumulative effects as a result of the Projects and other Projects combined need to access/maintain subsea cables and utilities. Any potential cumulative effects would not be significant.
Embedded environmental measures	A range of environmental measures within **Volume 3, Appendix 5.2** of the **EIA Report** that relate to infrastructure and other marine users are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these embedded environmental measures include but are not limited to, **Volume 4: Outline Scour Protection Plan**, **Volume 4: Outline Cable Plan** and advance warning and accurate location details of construction, maintenance and decommissioning operations, associated Safety Zones and advisory passing distances will be given via Notices to Mariners and Kingfisher Bulletins. The following embedded environmental measures are relevant to this aspect: M-028, M-029, M-030, M-031, M-038, M-039, M-040, M-044, M-050, M-054, M-106, M-115, M-120, M-186 and M-187.
Planning assessment	Relevant policies set out criteria for the Project to protect existing infrastructure and other marine users from unacceptable adverse impacts as well as to demonstrate how the Project has minimised any adverse effects. The Project would be developed within the North East sea region of Scotland and in the NE7 OAA. These areas have been identified by Scottish Government as generally appropriate for offshore wind development subject to detailed siting and consideration. The siting of the Project within such an area would be carefully considered to keep potential effects identified low and the Project would further refine its siting to reduce potential effects on existing infrastructure and surrounding marine uses as Outline supporting plans become refined and progressed ahead of construction. The assessment reported within **Volume 1, Chapter 18: Infrastructure and Other Marine Uses** of the **EIA Report** considers potential effects upon other offshore wind farms, subsea cables and utilities and licenced disposal sites during O&M and includes also for disturbance of UXO at construction and decommissioning. All identified effects at each stage of the Project will be **Not Significant** with the exception of a Moderate (**Potentially Significant**) effect could occur on the Hywind Scotland Pilot Park subsea cables from the development of the Project during its construction and O&M stages as a result of the increased presence of vessels and major component replacement for the offshore export cable corridor. In order to ensure significant effects upon Hywind Scotland Pilot Park did not occur in the first instance, the Applicant has identified a range of environmental measures that would manage its potential effects. Environmental measures for the liaison with Hywind Scotland Pilot Park to agree further safety measures and timings of work would be sought, alongside the programme for the Project's decommissioning be maintained in-line with a Decommissioning Programme. With such environmental measures in place, residual effects identified are **Not Significant**. The Project has therefore demonstrated that it has considered its potential effects on infrastructure and other marine users and has identified measures to reduce its potential effects to acceptable levels. Given that no significant effects have been identified it is considered that the Project would be in accordance with policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 6, GEN 7, GEN 9, GEN 10, GEN 17, GEN 18, GEN 21, WILD FISH 1, CABLES 1, CABLES 2,

	Policy assessment
	FISHERIES 1, FISHERIES 2, FISHERIES 3 DEFENCE 1, DEFENCE 3, TRANSPORT 1, TRANSPORT 2, TRANSPORT 4, TRANSPORT 6 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and in accordance with the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1 Tackling Climate and Nature Crises, 14 Design, Quality and Place and 18 Infrastructure First of NPF4. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.6.4 Civil and military aviation

Table 6.7 Civil and military aviation

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle, • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • DEFENCE 1 • DEFENCE 3 Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 11 Energy
Impact assessment	**Volume 1, Chapter 31: Civil and Military Aviation** of the **EIA Report** has identified **no significant** adverse effects resulting from the Project, including no transboundary effects. However, Major Adverse (**Significant**) effects are identified from the WTGs having an effect on the operation of the Primary Surveillance Radar receptors during the O&M stage of the Project. Remaining effects identified are all Minor (**Not Significant**) in nature. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** concluded no significant inter-related effects would occur. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identifies the potential for a number of Minor Adverse (**Not Significant**) cumulative effects as a

	Policy assessment
	result of the Projects and other Projects combined effects on Primary Surveillance Radar receptors. Any potential cumulative effects would not be significant.
Embedded environmental measures	A range of environmental measures within **Volume 3, Appendix 5.2** of the **EIA Report** that relate to civil and military aviation are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these embedded environmental measures include but are not limited to, the use of a **Volume 4: Lighting Management Plan**, appropriate marking of the Project on Admiralty and aeronautical charts and any temporary obstacles associated with offshore infrastructure (such as WTGs and platforms) that are of more than 91.4m in height (e.g. construction infrastructure such as cranes and / or meteorological masts) are to be identified to military and civil aviation aircrews by notifying the Notice to Airmen system. The following embedded environmental measures are relevant to this aspect: M-045, M-047, M-063, M-100, M-101, M-106, M-116 and M-120.
Planning assessment	Relevant policies set out a need for the Project to ensure it does not unacceptably compromise affected civil and military aviation receptors. The Project would be designed to ensure it would minimise its potentially effects upon civil and military aviation receptors and would be developed within the NE7 OAA, which is identified as suitable for offshore wind farm development. The Project would use environmental measures that would aid in achieving the level of effects identified and demonstrate the Project's attempts to mitigate its potential effects on civil and military aviation receptors. Whilst the majority of potential effects identified are confined to being minor (**Not Significant**) in nature, it is acknowledged that there would potentially be major (**Significant**) effects on Primary Surveillance Radar receptors during the O&M stage of the Project. **Volume 1, Chapter 31: Civil and Military Aviation** of the **EIA Report** provides examples of additional mitigation that the applicant could pursue to reduce potential effects at the Allanshill Primary Surveillance Radar and the Perwinnes Primary Surveillance Radar, with the later requiring less mitigation. Such mitigation could take the form of further refinement of the siting of the WTG to reduce their potential effects on the Perwinnes Primary Surveillance Radar and blanking and airspace changes being applied to help ensure the Allanshill Primary Surveillance Radar would also be less affected by the Project. With regard to the potential effects on the Buchan Primary Surveillance Radar, consultation with the MOD would continue to ensure such effects are mitigated before the O&M stage of the Project begins. Consultation with NATS is ongoing with the aim of delivering a suitable mitigation solution for Allanshill and Perwinnes PSRs prior to the O&M stage of the Project. Should the further mitigation identified be applied following further consultation and refinement by the MOD, it is likely that the potential significant effects identified on Primary Surveillance Radar receptors would be reduced and become acceptable. The Project therefore demonstrates that it would actively seek to minimise its effects on civil and military aviation receptors, including offering the option for further bespoke mitigation on certain receptors. Even though there is the potential for significant effects upon civil and military aviation receptors, such effects have been accurately quantified and potential mitigation proposed, meaning the Project would be in accordance with policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 17, GEN 18, GEN 21, DEFENCE 1 and DEFENCE 3 of Scotland's National Marine Plan (2015) and in accordance with the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1 Tackling Climate and Nature Crises and 11 Energy of the NPF4.

	Policy assessment
	Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.7 Cultural and visual environment

6.7.1 Marine archaeology and cultural heritage

Table 6.8 Marine archaeology and cultural heritage

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 6 Historic Environment • GEN 9 Natural Heritage • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • CABLES 1 • CABLES 2 • REC & TOURISM 5 Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 7 Historic Assets and Places
Impact assessment	**Volume 1, Chapter 16: Marine Archaeology and Cultural Heritage** of the **EIA Report** has identified **potential Very Large Adverse (Significant)** and **Large Adverse (Significant)** of medium magnitude in relation to potential effects of the Project on currently unknown potential archaeological remains during the construction and O&M stages of the Project respectively. Remaining effects identified are limited to being **not significant** and of low to no change in magnitude. No transboundary effects have been identified. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** identifies no significant inter-related effects have been identified on marine archaeology and cultural heritage receptors. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identified no significant cumulative effects.

	Policy assessment
Embedded environmental measures	A range of environmental measures within **Volume 3, Appendix 5.2** of the **EIA Report** that relate to marine archaeology and cultural heritage are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these embedded environmental measures include but are not limited to the use of Archaeological Exclusion Zones and Temporary Exclusion Zones to ensure high and medium potential archaeological receptors are avoided, **Volume 4: Outline Written Scheme of Investigation (Offshore)** and a Protocol for Archaeological Discoveries (see **Volume 3, Appendix 16.5: Protocol for Archaeological Discoveries** of the **EIA Report**) will be in place during the Project to minimise the risk to marine archaeological receptors and ensure that an appropriate and informed mitigation strategy is developed and implemented and receptors of lesser importance will be avoided where practical through micrositing. The following embedded environmental measures are relevant to this aspect: M-034, M-035, M-036, M-037, M-115, M-120, M-122 and M-199.
Planning assessment	Relevant policies set out criteria for the Project to protect archaeological and heritage assets from being disturbed, alongside protecting their character and setting if appropriate. The Project has been carefully sited and designed to ensure it avoids areas of known archaeological remains and heritage assets, with marine archaeological remains of lesser significance being avoided by the temporary and permanent offshore footprint, where it would be practical. However, it is acknowledged that the construction and O&M stages of the Project have the potential to generate significant effects of medium magnitude on currently unknown archaeological remains. The Project would attempt to ensure such effects are managed through ensuring the loss or disturbance of possible submerged historic elements arising from altered seabed conditions (e.g. scour) will be mitigated in the first instance and as far as possible, through sensitive design including utilising the mechanisms of Areas of Archaeological Interest (AAI) and archaeological exclusion zones environmental measures where necessary. Whilst it might not be possible to full mitigate these significant effects, the Project has demonstrated its commitment to reducing its overall potential effects on all other heritage receptors through its applied environmental measures, of which few effects are identified, and has sought to propose the best and most suitable embedded mitigation for the identified potential significant effects in the design of the Project. Even though there is the potential for significant effects upon marine archaeology and cultural heritage related to the disturbance of unknown archaeological remains, such effects have been accurately quantified and potential mitigation proposed, meaning the Project would be in accordance with policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 6, GEN 9, GEN 17, GEN 18, GEN 21, CABLES 1, CABLES 2 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and in accordance with Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1 Tackling Climate and Nature Crises and 7 Historic Assets and Places of NPF4. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.7.2 Seascape, landscape and visual

Table 6.9 Seascape, landscape and visual

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 7 Landscape/seascape • GEN 9 Natural Heritage • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • CABLES 1 • REC & TOURISM 5 Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 4 Natural Places • Policy 6 Forestry, Woodland and Trees • Policy 10 Coastal Development • Policy 11 Energy • Policy 14 Design, Quality and Place • Policy 20 Blue and Green Infrastructure
Impact assessment	As identified within **Volume 1, Chapter 17: Seascape, Landscape and Visual** of the **EIA Report**, the offshore components of the Project have been scoped out due to having no identifiable significant effects and therefore also would not result in any transboundary, inter-related or cumulative effects. The scoping out of effects was confirmed by the Scoping Opinion (informed by MD-LOT and NatureScot) with the following statement: "*given the distance from shore, the Scottish Ministers support NatureScot's representation and are content that the Seascape, Landscape and Visual Impact Assessment for the offshore elements located within the Developments OAA [Option Agreement Area] can be scoped out of the EIA Report*." (Paragraph 5.13.1). It is important to note that the assessment contained within **Volume 1, Chapter 17: Seascape, Landscape and Visual** of the **EIA Report** only considers the landscape and visual effects from the offshore infrastructure. **Volume 1, Chapter 27: Landscape and Visual** of the **EIA Report** contains the assessment of the potential effects resulting from the onshore grid connection infrastructure associated with the Project and its accordance with relevant planning policy is identified within Table 6.6 of the **Onshore Planning Statement**.
Embedded environmental measures	No embedded environmental measures associated with the offshore elements of the Project are relevant to the scoping out of the Seascape Landscape and Visual Impact Assessment.

	Policy assessment
Planning assessment	Relevant policies set out detailed criteria for the Project to protect the seascape, landscape and visual amenity, character and setting of its surroundings from unacceptable adverse impacts, alongside creating an expectation for mitigation and/or landscape improvements to be demonstrated as required. Due to the design and siting of the Project, a proportionate Seascape Landscape and Visual Impact Assessment was able to be carried out and found there would be no significant effects resulting from the Project's offshore infrastructure. Due to this, it is therefore considered that the Project is in accordance with policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 7, GEN 9 Natural Heritage, GEN 17, GEN 18, GEN 21, CABLES 1, and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and be in accordance with the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1 Tackling Climate and Nature Crises, 4 Natural Places, 6 Forestry, Woodland and Trees, 10 Coastal Development, 11 Energy, 14 Design and Quality and Place and 20 Blue and Green Infrastructure of the NPF4.

6.8 Climate context

6.8.1 Climate resilience

Table 6.10 Climate resilience

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 5 Climate Change • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 2 Climate Mitigation and Adaptation • Policy 10 Coastal Development • Policy 11 Energy • Policy 14 Design, Quality and Place • Policy 22 Flood Risk and Water Management
Impact assessment	**Volume 1, Chapter 28: Climate Resilience** of the **EIA Report** has identified **no significant** effects resulting from the Project, including no transboundary effects.

	Policy assessment
	Volume 1, Chapter 32: Inter-Related Effects of the **EIA Report** identifies that the climate resilience assessment is different to other technical aspects reported upon in the EIA as the receptor assessed is the Project, and not receptors within the environment. As such, there are no receptor-led inter-related effects. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identifies that the resilience of the Project assets is unaffected by the 'other developments', as such the climate change resilience assessment provided no additional consideration of cumulative effects. Due to the nature of potential effects relating to the climate resilience of the Project, the majority of potential effects are 'very unlikely' or 'unlikely' to occur and would have either a Negligible (**Not Significant**) or Minor (**Not Significant**) effect. Identified 'possible' Minor (**Not Significant**) are confined to the increase in frequency and severity of storms as a result of climate change. Such storms have the potential to affect every stage of the Project through delaying work, causing damage to plant / machinery and human health. Similarly, the increased risk of higher temperatures associated with climate change would have similar effects, as higher temperatures could cause problems on human health in the form of heat stress or exhaustion.
Embedded environmental measures	A range of embedded environmental measures within the **Volume 3, Appendix 5.1** of the **EIA Report** that relate to climate change are embedded as part of the Project design to remove or reduce significant effects as far as possible. Examples of these embedded environmental measures include, but are not limited to, using a WTG design that allows for 50-year return period values for short term gust, peak wind speed and wave conditions, and using well maintained and serviced equipment that will have greater ability to withstand adverse weather. The following embedded environmental measures are relevant to this aspect and only the offshore relevant or Whole Project relevant measures are identified: M-028, M-054, M-097, M-106, M-119, M-158, M-159, M-160, M-166, M-170, M-177, M-179, M-181. M-182, M-188, M-189, M-190, M-191, M-192, M-193, M-198 and M-211.
Planning assessment	Relevant policies set out a need for the Project to ensure it would be resilient to the ongoing and emerging effects of climate change. The Project seeks to ensure it would maximise its ability to weather the ongoing and emerging effects of climate change. This is demonstrated by **Volume 1, Chapter 28: Climate Resilience** of the **EIA Report** identifying **no significant** effects from this topic, with potential effects identified primarily being 'very unlikely' or 'unlikely'. Where there is the potential for effects, these would only manifest in terms of having a Minor (**Not Significant**) effect. The environmental measures associate with climate resilience, and the **Volume 4: Outline Construction Environment Management Plan (CEMP)** especially, would ensure the Project maximises its climate resilience. Potential effects resulting from the ongoing and emerging effects of climate change in the construction and decommissioning stages is primarily confined to disruption in construction / decommissioning activities. Such effects would continue to be managed in a safe fashion for workers and visitors to site, such as through the careful monitoring of weather forecasts, ensuring health and safety is prioritised during the construction and decommissioning stages and allowing for the pausing of work, if needed, should severe flooding or storm events occur. Plant machinery and resources would be secured sensibly to ensure they do not become problematic or damaged during the events of severe flooding or storms. It is important to note that high temperatures that

	Policy assessment
	could cause an increase in the occurrence of heat related human health issues would also be managed, with it understood that overheating is an important and recognised potential health issue. Across all stages of the Project, it would be managed in accordance with strategies (such as the O&M Strategy and the construction programme) to ensure emergency procedures and access arrangements are in place, and known by workers and visitors, in the case of severe weather or flooding events or what to do if experience the effects of temperature related issues (such as heat stress). Works required across the stages would also be broadly programmed to avoid forecast extreme weather to reduce the Project's potential exposure to such events. Elements of the Project have been designed to minimise their vulnerability to the ongoing and emerging effects of climate change, with the cabling associated with the Project being buried in accordance with a Cable Burial Risk Assessment to better ensure cabling is not disturbed by extreme weather events. It has also been designed to be safe during the O&M stage of the Project, such as through the WTG being designed to ensure they could withstand predicted temperature rises and fluctuations. This would all aid in ensuring that workers attending the Project during the O&M stage are safe. Similarly, environmental measures such as a Decommissioning Programme would ensure the decommissioning stage of the Project is carried out in a manner that is safe for workers and reduce the adverse effects from weather events. It is therefore considered that the Project would be in accordance with policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 5, GEN 17, GEN 18, GEN 21 of Scotland's National Marine Plan and in accordance with policies 1 Tackling the Climate and Nature Crises, 2 Climate Mitigation and Adaptation, 10 Coastal Development, 11 Energy, 14 Design, Quality and Place, 22 Flood Risk and Water Management of NPF4. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.8.2 Greenhouse gases

Table 6.11 Greenhouse gases

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a)

	Policy assessment
	NPF4 (2023): • Policy 1 Tackling Climate and Nature Crises • Policy 2 Climate Mitigation and Adaptation • Policy 11 Energy
Impact assessment	**Volume 1, Chapter 29: Greenhouse Gases** of the **EIA Report** of the accompanying EIA Report has identified no likely significant adverse effects resulting from the Project, including no transboundary, inter-related or cumulative effects (the latter two being covered inherently within **Chapter 29: Greenhouse Gases** of the **EIA Report** due to the nature of GHG effects and not within separate chapters on inter-related or cumulative effects). The construction, O&M and decommissioning of infrastructure will inevitably generate GHG emissions. These have been quantified for each of the lifecycle stages (construction, O&M and decommissioning). The combined GHG emissions attributed to development of the Project are assessed to have a negligible contribution to the UK Carbon Budgets and therefore are unlikely to affect the UK's ability to meet its future net zero carbon targets. On this basis the significance of effect is assessed as Minor Adverse (**Not Significant**). Overall, the assessment reported in the Chapter identifies that the Project would have a **Beneficial (Significant)** effect due to the Project aiding in the decarbonisation of the UK's national electricity network. The beneficial effect of renewable energy generation substantially exceeds the Minor Adverse effects arising from construction, O&M and decommissioning.
Embedded environmental measures	A range of supporting environmental measures within the **Volume 3, Appendix 5.2** of the **EIA Report** that relate to GHG are embedded as part of the Project's design to remove or reduce significant effects as far as possible. Measures to minimise the lifecycle of GHG emissions will be implemented, especially during the Project's construction stage, including in relation to managing offshore vessel movements to ensure they maximise operational efficiencies. The following supporting environmental measures are relevant to this aspect: M-079, M-098 and M-099.
Planning assessment	Relevant policies set out criteria to ensure the Project would minimise its contribution to the generation of GHGs and are supportive of renewable energy development. The Project would deliver up to 3GW of renewable energy generation capacity that would directly contribute to decarbonisation of the UK national electricity network and wider UK net zero targets. Overall, therefore the Project would deliver significant benefits to the UK, whilst ensuring it minimises the levels of GHG generated over the Project's lifetime. Through its supporting environmental measures, the Project would commit itself to maximising the potential to reduce lifecycle GHG emissions, including those at construction stage, as managed by the supporting **Volume 4: Outline Construction Environmental Management Plan**. Given the significant contribution of its electricity generation over the Project lifetime, it is expected to offset its lifecycle emissions after 7.5 years of its operational life, with a net carbon savings of 1,614,670 tCO_2e/year. This further demonstrates the Project's contribution to GHG reduction. When constructing, operating and decommissioning energy infrastructure it is inevitable that there would be a release of GHG into the atmosphere. However, the Project has been designed to minimise emissions, such as choosing a location where peat is absent (for onshore assets), and embedding environmental measures within the Project that

	Policy assessment
	limit emissions. As such, the GHG emissions are assessed to be Minor Adverse (**Not Significant**). It is therefore considered that the Project is in accordance with policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 17, GEN 18, GEN 21 of Scotland's National Marine Plan (2015), Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1 Tackling Climate and Nature Crises, 2 Climate Mitigation and Adaptation and Policy 11 Energy of NPF4. It is also considered that the Project would help to meet the renewable energy targets of the UK and Scotland, which are sought to help decarbonise the electricity grid. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.9 Socio-economic context

6.9.1 Socio-economics

Table 6.12 Socio-economics

	Policy assessment
Summary of key policy requirements	Scotland's National Marine Plan (2015): • GEN 1 General Planning Principle • GEN 2 Economic Benefit • GEN 3 Social Benefit • GEN 4 Co-existence • GEN 17 Fairness • GEN 18 Engagement • GEN 21 Cumulative Impacts • FISHERIES 1 • FISHERIES 2 • FISHERIES 3 • REC & TOURISM 5 • TRANSPORT 1 • TRANSPORT 2 • TRANSPORT 4 • TRANSPORT 6 Scottish Government: • Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) • Draft Updated Sectoral Marine Plan (Scottish Government 2025a) NPF4 (2023): • Policy 1 - Tackling Climate and Nature Crises • Policy 9 Brownfield, vacant and derelict land and empty buildings • Policy 11 Energy • Policy 23 Health and Safety • Policy 25 Community Wealth Building

	Policy assessment
	• Policy 26 Business and Industry • Policy 29 Rural Development
Impact assessment	**Volume 1, Chapter 30: Socio-economics** of the **EIA Report** has identified significant beneficial effects resulting from the Project, however no transboundary effects. It is expected that Major Beneficial (**Significant**) effects would result from the construction and O&M stages of the Project, as well as the delivery of a wide range of Minor Beneficial (**Not Significant**) and Moderate Beneficial (**Significant**) effects. It is noted that Minor Adverse (Not Significant) and Moderate Adverse (Not Significant) effects would accompany the many beneficial effects, though important no adverse effect would be significant. Beneficial effects are expected to be experienced by: • the local and wider Scottish economy; • the local area having the necessary workers to accommodate the Projects need; • the Project generating a demand for goods and services which would stimulate the economy; • the number of jobs created; and • how the Project would act as a core employer that can aid in the strengthening of local communities and their identity. Only Beneficial (**Significant**) residual effects are expected to result from the Project, though it is acknowledged that some of the direct beneficial effects identified would be minor or moderate in nature. The socio-economic consequences of decommissioning are complex to foresee as they will depend on a supply chain which could have dedicated services for each stage of WTG disassembly provided from local or international hubs with effects for Scapa or other ports dependent on where they are positioned in the supply chain. For these reasons, the socio-economic consequences of decommissioning are not assessed in more detail than to suggest that they are likely to be positive for the decommissioning Scapa port and possibly other ports due to the intrinsic commercial opportunity. **Volume 1, Chapter 32: Inter-Related Effects** of the **EIA Report** identifies that there are no inter-related effects identified in which there are secondary environmental effects as a result of socio-economic effects. **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report** identified the Project would deliver significant beneficial socio-economic effects in terms of providing economic opportunities and employment. These are accompanied by adverse cumulative effects that are not significant for socio-economics and arise from potential changes in economic returns from loss of agricultural production, residential amenity, and changes to visitor experience.
Embedded environmental measures	A range of environmental measures within the **Volume 3, Appendix 5.2** of the **EIA Report** that relate to socio-economics are embedded as part of the Project design to remove or reduce significant environmental effects as far as possible. Examples of these environmental measures include, but are not limited to, the use of a local workforce and supply chains, communication of working schedules to avoid and minimise disruption to local communities and the use of a Fisheries Mitigation, Monitoring and Communication Plan to ensure local communities are engaged with and supported. The following environmental measures are relevant to this aspect:M-219, M-222, M-224, M-225, M-226, M-227 and M-288.

	Policy assessment
Planning assessment	Relevant policies set out a need for the Project to demonstrate it would provide socio-economic benefits and how such benefits have been maximised as much as possible. The Project would create significant socio-economic beneficial effects through job creation from demand for labour and activity in supply chains locally and in the wider region over the 12 year construction and 35 year operational stages. A subsequent decommissioning stage is also expected to generate further employment opportunities in Scotland that could, to some degree, be filled by local people. No significant adverse effects on socio-economic receptors were identified. 1,250 full-time equivalents (FTEs) jobs would be created over the construction and O&M stages of the Project. It is identified that, of the overall total of 1,250 jobs representing Project employment, approximately 805 (65%) jobs would be in manufacturing, fabrication and installation with 510 (41%) at or near a port and 295 (24%) in the wider supply chain across Scotland. The remaining 445 (35%) is the average level of operational jobs that arise during the 12 year construction stage. The Project will generate additional economic activity from expenditure along with increased employment, known as GVA. The level of GVA in Scotland generated by the Project is an average of £121.2m annually over the construction period and continues at £99.0m annually during the operational period. Beneficial employment effects are anticipated to be concentrated and sustained, bringing employment stability in a context of uncertainty in relation to jobs in the oil and gas sector. The construction stage includes appreciable employment at a range of ports in Scotland and work elsewhere in the associated supply chains. The O&M stage is anticipated to deliver a higher level of employment with enduring socio-economic benefits, improving workforce resilience and support. During the O&M stage, long-term jobs at ports may provide structural benefits and economic stability for communities, particularly where there are areas of deprivation such as within Peterhead and Fraserburgh. The use of land and marine areas experiences some disruption with minor impacts expected in the agriculture, shipping and commercial fishing sectors. Embedded measures are included that reduce adverse effects and enhance positive socio-economic outcomes, including the long term benefits to communities experiencing transition with growth in the offshore wind sector offsetting the decline in oil and gas industries. The Project has developed and will implement a Socio-Economic Action Plan (SEAP) for the Project, which outlines the steps the Project would take to maximise net economic benefits and contribute to community wealth building as per policy requirements. Within NPF4, Policy 11 - Energy places the onus on projects, and thereby applicants, to “maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities”. This means it is for the Applicant themselves to identify and propose ways in which their development proposals can maximise net economic benefits and contribute to community wealth building, as set out in the SEAP which is submitted in support of the consenting applications (onshore and offshore) for the Project. The SEAP also responds to relevant requirements and expectations outlined in Aberdeenshire Council’s Energy Developments Community Wealth Building Charter, which itself seeks to address relevant NPF4 policies. The SEAP therefore outlines a suite of evidence-based actions and commitments which the Project will adopt to maximise net economic benefits and contribute to community wealth building.

	Policy assessment
	This **SEAP** would be able to be kept up to date and evolve with the changing socio-economic situation, demonstrating the Project's commitment to providing positive socio-economic benefits that are felt at a local level. The socio-economic benefits that would be generated over the lifetime of the Project could help to reduce inequalities in the local area. Overall, the Project would result in a wide range of Beneficial (**Significant**) residual effects. The Project would be in accordance with policies GEN 1, GEN 2 Economic Benefit, GEN 3, GEN 4, GEN 17, GEN 18, GEN 21, FISHERIES 1, FISHERIES 2, FISHERIES 3, REC & TOURISM 5, TRANSPORT 1, TRANSPORT 2, TRANSPORT 4 and TRANSPORT 6 of Scotland's National Marine Plan (2015) and in accordance with the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1 Tackling Climate and Nature Crises, 9 Brownfield, vacant and derelict land and empty buildings, 11 Energy, 23 Health and Safety, 25 Community Wealth Building, 26 Business and Industry and 29 Rural Development of the NPF4, due to the significant benefits the Project would bring in terms of positive socio-economic effects. Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in **Section 3**, and the planning balance detailed in **Section 7** of this Planning Statement.

6.10 Habitat Regulations and the Derogation Case

6.10.1.1 Following the UK's departure from the European Union in January 2020, the government committed to maintaining international environmental obligations and retaining key legislative frameworks through the European Union (Withdrawal) Act 2018. Whilst the UK is no longer subject to future EU policy changes, many existing environmental and energy regulations have been incorporated into UK law and remain in force. In Scotland, these are implemented through the Habitat Regulations, which include:

- The Conservation (Natural Habitats, &c,) (as amended) Regulations 1994;
- The Conservation of Habitats and Species Regulations 2017 (HM Government, 2017b); and
- The Conservation of Offshore Marine Habitats and Species Regulations 2017 (HM Government, 2017c).

6.10.1.2 The provisions of the Habitat Regulations require that a project not directly connected with, or necessary to, the management of a European site, and 'likely to have a significant effect' on a European site (whether alone or in-combination with another plan or project) must be subject to an appropriate assessment of the implications for that site in view of the site's conservation objectives. The legal obligations to undertake an appropriate assessment lie with the relevant Competent Authority which, for s.36 consent and marine licence applications, is the Scottish Ministers. However, the Applicant has an obligation to provide information to the Scottish Ministers so that they are able to effectively carry out the appropriate assessment.

6.10.1.3 The **RIAA** concludes that Adverse Effect on Site Integrity (AEoSI) cannot be ruled out on a limited number of designated sites and features as listed below. In addition, a number of further sites and features have been included on a 'without prejudice' basis. This means

that the Applicant has concluded that AEoSI can be excluded for the sites and species. However, it recognised that there is a risk that, based on historic conclusions of NatureScot and MD-LOT in the determination of other offshore wind consenting applications, that the Scottish Ministers may be unable to rule-out an AEoSI arising from the in-combination impacts of all planned projects to these SPAs.

6.10.1.4 The **RIAA** concluded AEoSI cannot be ruled out for the following sites and species:

- guillemot:
  - Buchan Ness to Collieston Coast SPA;
  - Troup, Pennan and Lion's Head SPA; and
  - Copinsay SPA.

6.10.1.5 The following sites and species are included on a 'without prejudice' basis:

- kittiwake:
  - Buchan Ness to Collieston Coast SPA;
  - Troup, Pennan and Lion's Head SPA;
  - Fowlsheugh SPA;
  - East Caithness Cliffs SPA;
  - North Caithness Cliffs SPA;
  - Forth Islands SPA;
  - St Abb's Head to Fast Castle SPA; and
  - West Westray SPA.
- razorbill:
  - Troup, Pennan and Lion's Head SPA; and
  - East Caithness Cliffs SPA.
- puffin:
  - Forth Islands SPA.
- gannet:
  - Forth Islands SPA;
  - Fair Isle SPA; and
  - Hermaness, Saxa Vord and Valla Field SPA.

6.10.1.6 In light of these conclusions and in line with the expectations of the Habitats Regulations, the Project is supported by a **Derogation Case**. Offshore wind developments such as MarramWind must comply with strict environmental protection requirements, particularly where projects may affect designated European sites protected for their conservation value. In circumstances where a project cannot fully avoid adverse effects on site integrity, even after applying all feasible mitigation, UK and Scottish legislation provides a legal pathway known as a "derogation case". This process allows decision-makers to consider whether the public interest and benefits of the Project are sufficient to justify proceeding, provided that no viable alternatives exist and appropriate compensation measures are secured.

6.10.1.7 This section introduces the supporting **Derogation Case**, which clearly demonstrates that there are no alternative solutions to the Project, that there are imperative reasons of overriding public interest (IROPI) to authorise and proceed with the Project and that any necessary compensation measures can be secured to protect and benefit the UK's National Site Network.

6.10.1.8 The supporting **Derogation Case** document sets out a clear and overriding justification for the Project, balancing the considerable public benefits against any residual adverse effects on protected sites. It demonstrates that:

- the Project delivers significant public benefits, including climate change mitigation, energy security, affordability, supply chain development, and socio-economic growth;
- all reasonable alternative solutions have been considered and found to be unfeasible; and
- compensation measures are proposed to ensure the overall coherence of the UK's Nature Sensitive Network (NSN) is protected.

6.10.1.9 The urgent need for the Project is justified as follows:

- UK and Scottish decarbonisation targets:
  - The low-carbon electricity generated by the Project will substantially support efforts to reduce carbon emissions in support of the Scottish Government's 2045 Net Zero statutory target (Climate Change (emissions reductions target) (Scotland) Act 2024) and UK Government statutory commitment to Net Zero by 2050 (Climate Change Act (2050 Target Amendment) Order 2019).
  - Urgent progress on decarbonisation is required to meet national targets. In 2019, both the Scottish First Minister and UK Parliament declared a climate emergency, setting legally binding targets and acknowledging that delivery at scale is needed to meet these targets.
  - Urgent action is required to deliver decarbonisation and limit global warming to less than 1.5 degrees Celsius.
  - The Project will deliver 3GW of renewable energy, providing a substantial contribution to decarbonisation and Net Zero targets and further countering climate change.
- Energy security for Scotland and the UK:
  - Energy security is very important to public safety, and with recent events including the COVID-19 pandemic and Russian invasion of Ukraine, the UK's reliance on imported fossil fuels has been made clear. The anticipated fluctuating nature of oil and gas prices due to the unpredictable global political climate and the National Grid demand and supply variability, is likely to continue throughout the lifetime of the Project. This reinforces the increased need for Scottish and UK energy supply security. The Project will provide an important contribution to energy security.
  - Increasing the renewable capacity within the UK will reduce the reliance on imported sources and therefore increase the UK's security with respect to both quantity and cost of energy.
- Affordability for the UK consumer:
  - New low carbon energy generation capacity, with the aim of lowering the cost to the consumer in the long term, is needed to deliver a just and fair energy transition away from fossil fuels.

- Economies of scale arising from large-scale projects will drive efficiencies through the different stages of the Project and thereby supports the supply of low carbon electricity at lower cost to the consumer.
- Increasing UK energy sources will reduce the reliance on foreign energy sources and reduce the impact of external price fluctuations, ultimately acting to reduce the end cost for the consumer.

- Supply Chain for Scotland:
  - For floating offshore wind to be delivered at scale, a significant investment is required to develop the technology and supply chain, through procurement, construction, and O&M activities.
  - The Project will use floating units for the WTGs, therefore driving the development of a local Scottish supply chain and allows for the optimisation of the available resource within the ScotWind lease area.
  - Legally, technically and commercially viable large-scale projects are needed in the planning system, which will encourage investment in the supply chain.
  - With the first phase fully commissioned by 2037, the Project will be one of the first large-scale developments to provide confidence to the market and enable supply chain development.
- Socio-economic benefit:
  - Facilitation of socio-economic development is a key aim in the Draft Energy Security and Just Transition Plan through creating employment opportunities in the low carbon energy sector. Floating offshore wind is a key area that will support the transition of Scottish resource from the oil and gas industry to offshore wind.
  - The Project will contribute to the Just Transition away from non-renewable energy sources, which is particularly relevant to those people who rely on the fossil fuel industry within the north-east of Scotland.
  - The Project's first phase is anticipated to complete commissioning by 2037 and will provide significant transition opportunity within the sector. It will bring investment to the local areas around the site resulting in increased jobs, investment and other socio-economic benefits to local communities.

6.10.1.10 The **Derogation Case** and supporting documentation provide all necessary information to demonstrate that, in line with the requirements of the Habitats Regulations, there is a clear and overriding case for proceeding with the Project, there are no alternative solutions which satisfy the Project's objectives and that any necessary environmental compensation can be secured. The Scottish Ministers can therefore be confident that the Project should be authorised and proceed under a Derogation Case for Imperative Reasons of Overriding. As such, the **Derogation Case** aids in ensuring the Project would be in accordance with Scotland's National Marine Plan, Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and NPF4.

7. Planning Balance and Conclusions

7.1 Introduction

7.1.1.1 This Section balances the technical assessment, policy compliance and the environmental, social and economic considerations associated with the offshore elements of the Project. It draws together the evidence presented across the relevant offshore chapters and the whole Project chapters of the **EIA Report**, the embedded mitigation measures secured through **Volume 3, Appendix 5.2** of the **EIA Report**, and evaluates the Project against the policies of Scotland's National Marine Plan (2015), the requirements of the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a), as well as the policies set out in NPF4. The Section concludes the Planning Statement by balancing the acceptability of impacts, the benefits of and need for the Project, and the accordance of the Project with relevant policies and other considerations in order to reach a final view as to whether consent should be granted.

7.2 Planning considerations

7.2.1.1 Across all environmental aspects, the Project been shown to be sensitively designed and supported by a suite of embedded environmental measures, where necessary. The planning assessment of the various environmental topics, as set out in **Section 6** above, confirms that many effects are Negligible or Minor Adverse (**Not Significant**). Where significant effects are expected, these are considered in greater detail above, alongside the proposed mitigation and identified embedded environmental measures that have been incorporated in the first instance to reduce potential effects as far as possible.

7.2.1.2 Beneficial effects have been concluded within **Volume 1, Chapter 29: Greenhouse Gases** of the **EIA Report**, with these often being assessed as **Significant**. This is due to the significant contribution of renewable electricity generation by the Project over its lifetime, and it being expected to offset its lifecycle emissions after 7.5 years of its operational life, with a carbon saving of 1,614,670 tCO_2e/year. Therefore, for the majority (27.5 years) of the Project's O&M stage, carbon savings would be provided.

7.2.1.3 Additionally, **Volume 1, Chapter 30: Socio-Economics** of the **EIA Report** identified an overall Beneficial (**Significant**) residual effect of the Project, due to the many and multi-faceted nature of the benefits generated, through helping to grow the local economy and providing employment opportunities. Whilst a detailed assessment of the Project's decommissioning stage is not provided within **Volume 1, Chapter 30: Socio-economics** of the **EIA Report**, it is expected that any Decommissioning Programme prepared would provide beneficial socio-economic associated effects.

7.2.1.4 Furthermore, the well-designed nature of the Project is further demonstrated by the findings of **Volume 1, Chapter 17: Seascape, Landscape and Visual** of the **EIA Report**, which identifies that potential effects from the Project on the seascape and surrounding landscape would be Negligible (**Not Significant**) and therefore were scoped out.

7.2.1.5 In relation to planning considerations, the EIA Report has predominantly concluded that, with the exception of certain residual effects noted in **Volume 1, Chapter 14: Commercial Fisheries, Volume 1**, **Chapter 31: Civil and Military Aviation**, **Volume 1, Chapter 16: Marine Archaeology and Cultural Heritage,** and the cumulative effects identified within **Volume 1, Chapter 10: Benthic, Epibenthic and Intertidal Ecology** of the **EIA Report**, the Project is not expected to have any additional residual significant adverse effects. Moreover, as outlined below, the residual adverse effects identified are not sufficient to outweigh the wider benefits of the Project.

7.3 The Electricity Act 1989 and policy considerations

7.3.1.1 The Project demonstrates full alignment with the duties set out under s.36 and Schedule 9 of the Electricity Act 1989. In its design and consenting approach, the Project has had regard to preserving natural beauty and conserving ecological and geological features, as well as safeguarding sites of architectural, historic and archaeological interest. Comprehensive mitigation measures have been embedded to minimise potential adverse effects on these receptors. The embedded environmental measures of using the Areas of Archaeological Interest and archaeological exclusion zones would ensure the Project is able to safely manage undiscovered archaeological remains should they be discovered during any stage of the Project. **Volume 4: Outline Written Scheme of Investigation (Offshore)** and **Volume 3, Appendix 16.5: Protocol for Archaeological Discoveries** of the **EIA Report** would ensure the Project manages and monitors its potential effects on known and unknown archaeological receptors, and receptors of lesser importance will be avoided where practicable through micrositing.

7.3.1.2 To maintain safe navigation and protect legitimate sea users, the Project incorporates spatial planning, lighting and marking protocols in accordance with marine safety standards. This is demonstrated through the environmental measures for Safety Zones and **Safety Zone Statement**, which would aid in ensuring other marine vessels are appropriately informed of the Project's activities and associated vessels. Furthermore, safety would be further prioritised through the implementation of environmental measures such as an **Volume 4: Outline Vessel Management and Navigational Safety Plan**, which would seek to co-ordinate the Project's vessels in a manner that does not disrupt other vessels and their required activities to a significant degree. The use of a **Fisheries Mitigation, Monitoring and Communication Plan** would also further seek to target the Project's potential effects on local fishing industries to ensure the Project does not compromise local fishing. The extensive use of embedded environmental measures aids in demonstrating the extent to which the Project aims to reduce its potential effects on other marine users and commercial fisheries.

7.3.1.3 Statutory consultees and stakeholders have been actively engaged throughout the design and operational planning stages to address amenity and navigational concerns, as outlined in **Section 4** of this Planning Statement. In light of the 18-month timeframe from Proposal of Application Notice to onshore planning application submission, four rounds of statutory consultation were held. **Table 4.1** of this Planning Statement highlights the statutory consultation that has been carried out to support the Project, with **Table 4.2** providing a summary of offshore focused feedback received.

7.3.1.4 Furthermore, the Project commits to protecting landscape, seascape, and cultural heritage, reducing visual and environmental impacts through careful siting and design, and implementing robust monitoring and adaptive management during construction, operation, and decommissioning stages. Together, this ensures compliance with Schedule 9 obligations on navigation and amenity. This is further demonstrated by **Volume 1, Chapter 17: Seascape, Landscape and Visual** of the **EIA Report** identifying that due to the design and siting of the Project, its offshore elements were able to be scoped out due to identified potential effects being minimal to non-existent, with no requirement for environmental measures to manage effects.

7.4 Planning balance

7.4.1.1 The lengths to which the Project has sought to minimise its potential adverse effects can be observed through the majority of identified potential adverse effects being Negligible Adverse or Minor Adverse and **Not Significant**. These adverse effects are easily outweighed by the national benefits the Project would provide. The EIA Report aspect chapters that identify such effects include:

- **Volume 1, Chapter 6: Marine Geology, Oceanography and Physical Processes**;
- **Volume 1, Chapter 7: Marine Water and Sediment Quality**;
- **Volume 1, Chapter 8 Underwater Noise**;
- **Volume 1, Chapter 9: Electromagnetic Fields**;
- **Volume 1, Chapter 11: Marine Mammals**;
- **Volume 1, Chapter 13: Fish Ecology**;
- **Volume 1, Chapter 17: Seascape, Landscape and Visual**; and
- **Volume 1, Chapter 28: Climate Resilience**.

7.4.1.2 Similarly, **Volume 1, Chapter 15: Shipping and Navigation** of the **EIA Report** identifies the Project would only result in Tolerable with Mitigation and Broadly Acceptable effects, with the chapter identifying suitable mitigation. Under the MCA methodology (Annex 1 to Marine Guidance Note (MGN) 654) (MCA, 2021), and in line with international marine risk assessment standards, the International Maritime Organisation Formal Safety Assessment (IMO FSA) (IMO, 2018) approach has been taken for the impact assessment. The FSA methodology is centred on risk control and assesses each impact in terms of its frequency of occurrence, severity of consequence in order that its significance can be determined as 'broadly acceptable', 'tolerable with mitigation' or 'unacceptable'. This explains the difference in the assessment conclusion terminology used between **Volume 1, Chapter 15: Shipping and Navigation** of the **EIA Report**.

7.4.1.3 As demonstrated by the findings of these chapters, the Project would be in accordance with the relevant aspects of policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 5, GEN 8, GEN 9, GEN 12, GEN 13, GEN 17, GEN 18, GEN 21, WILD FISH 1, CABLES 1, CABLES 2, FISHERIES 1, FISHERIES 2, FISHERIES 3, DEFENCE 1, DEFENCE 3 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and be in accordance with Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a), Planning Advice Note (PAN) 1/2011: Planning and Noise (2011) and policies 1, 2, 3, 4, 10, 14, 22 and 23 of the NPF4.

7.4.1.4 Whilst potentially significant effects are identified as a result of the Project's WTG within **Volume 1, Chapter 31: Civil and Military Aviation** of the **EIA Report**, additional mitigation measures have been proposed to reduce the Project's potential effects upon the identified Primary Surveillance Radar receptors. Additional refinements of the WTG's siting would help further reduce the potential effects upon the Perwinnes Primary Surveillance Radar, blanking and airspace changes being applied, thus minimising the Project's potential impact upon Allanshill Primary Surveillance Radar. It should be noted that ongoing and additional discussions with the Primary Surveillance Radar receptor owners are anticipated to identify further solutions/mitigation measures as applicable. This approach demonstrates the Project's commitment to addressing any adverse effects caused during construction and O&M and confirms the Project to be in keeping with policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 17, GEN 18, GEN 21, DEFENCE 1 and DEFENCE 3 of Scotland's National Marine Plan (2015) and in accordance with the Sectoral Marine Plan for Offshore Wind Energy

(Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1 and 11 of the NPF4.

7.4.1.5 **Volume 1, Chapter 16: Marine Archaeology and Cultural Heritage** of the **EIA Report** identifies potential significant effects upon undiscovered archaeological remains due to construction and O&M activities. However, such effects will be carefully managed, ensuring the loss or disturbance of possible submerged historic elements arising from altered seabed conditions (e.g. scour) will be reduced as part of the Project's environmental measures. Such measures include sensitive development design and the employment of AAI and archaeological exclusion zone mechanisms where necessary. This ensures that despite the identified effect, the Project would be supported by policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 6, GEN 9, GEN 17, GEN 18, GEN 21, CABLES 1, CABLES 2 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and in accordance with policies 1 and 7 of NPF4.

7.4.1.6 **Volume 1, Chapter 14: Commercial Fisheries** of the **EIA Report** identifies that the Project may result in a Moderate Adverse (**Significant**) effect upon commercial fisheries during all stages of the development. These effects include: a reduction in accessing established fishing grounds within the OAA and export cable corridor in terms of UK demersal otter trawl and UK demersal seine receptors; the resultant displacement of fishing activities leading to gear conflict; and increased fishing pressure on adjacent grounds. However, it should be noted that the Project is supported by a range of outline documentation which would be finalised prior to construction and help to reduce the Project's potential effects upon commercial fishery receptors. Moreover, a range of additional mitigation measures would be implemented which provide financial support to the fishing industry and explore the coexistence of fishing activities and the Project's operation. The Project is therefore compliant with the relevant requirements of policies GEN 1,GEN 2, GEN 3, GEN 4, GEN 9, GEN 10, GEN 17, GEN 18, GEN 21, WILD FISH 1, CABLES 1, CABLES 2, FISHERIES 1, FISHERIES 2, FISHERIES 3, DEFENCE 1, DEFENCE 3 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and in accordance with the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and Policy 1 of NPF4.

7.4.1.7 The potential for significant cumulative effects upon gannet, guillemot, razorbill, puffin, kittiwake and great black-backed gull species during the O&M stage of the Project is identified within **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report**. It is also acknowledged that Moderate Adverse (**Significant**) residual effects were identified upon guillemot within **Volume 1, Chapter 12: Offshore and Intertidal Ornithology** of the **EIA Report**. The Project proposes to consult with other developers to prevent the significant cumulative adverse effects identified from occurring. Additionally, the Project is committed to a significant number of environmental measures to help manage the potential effects upon ornithological receptors in the first instance. The Project is therefore be in keeping with the relevant requirements of policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 17, GEN 18, GEN 21, CABLES 1, CABLES 2, CABLES 4 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and in accordance with, the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 3, 4 and 11 of NPF4.

7.4.1.8 No further significant effects are associated with the offshore elements of the Project. The limited number of residual significant effects anticipated demonstrates the Project's sustainably designed nature and accordance with the relevant policies of Scotland's National Marine Plan, requirements of the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a), and accordance with policies 1, 3, 4, 7, 11, 14, 18 of NPF4.

7.4.1.9 Whilst not significant, **Volume 1, Chapter 18: Infrastructure and Other Marine Uses** of the **EIA Report** identifies Moderate Adverse (**Potentially Significant**) effects in terms of the Project's disturbance of the seabed resulting in a disruption to Hywind Scotland Pilot Park's ability to access their undersea cables. The Project is supported by a wide range of environmental measures that aim to minimise the Project's potential disturbance upon the seabed as far as reasonably practicable. Moreover, the Applicant will agree further safety measures with Hywind Scotland Pilot Park's developers to ensure all parties can access their respective cabling safely. As such, the Project will mitigate against the potential effects identified, thus demonstrating compliance with the marine and general planning policy aspects of policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 6, GEN 7, GEN 9, GEN 10, GEN 17, GEN 18, GEN 21, WILD FISH 1, CABLES 1, CABLES 2, FISHERIES 1, FISHERIES 2, FISHERIES 3 DEFENCE 1, DEFENCE 3, TRANSPORT 1, TRANSPORT 2, TRANSPORT 4, TRANSPORT 6 and REC & TOURISM 5 of Scotland's National Marine Plan (2015) and accordance with the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1, 14 and 18 of NPF4.

7.4.1.10 A wide range of socio-economic benefits are identified within **Volume 1, Chapter 30: Socio-Economics** of the **EIA Report**. The demand for local goods and services, provision of employment and business for private local suppliers and businesses, associated with the Project's construction, is expected to improve economic activity within the local area. The Project is therefore expected to give rise to **Significant** socio-economic benefits with any adverse effects identified as Negligible or Minor in nature and **Not Significant**. Furthermore, as identified within **Volume 1, Chapter 33: Cumulative Effects Assessment** of the **EIA Report**, significant beneficial cumulative effects would occur from the Project and other development providing significant employment opportunities and economic benefits.

7.4.1.11 In addition to the Project's provision of up to 3GW of clean, renewable energy, **Significant** beneficial effects are anticipated in relation to GHG and the decarbonisation of Scotland and the UK's electricity network (as identified within **Volume 1, Chapter 29: Greenhouse Gases** of the **EIA Report**). The Project is expected to offset its lifecycle emissions within 7.5 years of its operational life, with a carbon saving of 1,614,670 tCO2e/year, thus demonstrating the Project's significant contribution to renewable electricity generation and GHG reduction over its lifetime. The GHG and socio-economic effects that would be generated by the Project are therefore in accordance with the relevant aspects of policies GEN 1, GEN 2, GEN 3, GEN 4, GEN 17, GEN 18, GEN 21, FISHERIES 1, FISHERIES 2, FISHERIES 3, REC & TOURISM 5, TRANSPORT 1, TRANSPORT 2, TRANSPORT 4, TRANSPORT 6 of Scotland's National Marine Plan (2015), Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), Draft Updated Sectoral Marine Plan (Scottish Government 2025a) and policies 1, 9, 11, 23, 25, 26 and 29 of NPF4.

7.4.1.12 The Project is also supported by a NPP which provides a framework for enhancement would minimise potential effects upon the natural environment and meets the requirements of Policy 3 of the NPF4. In addition to the mitigation measures set out within the **Commitments Register** (see **Volume 3, Appendix 5.2** of the **EIA Report**), the NPP also helps to ensure the Project meets the requirements of the other NPF4 policies.

7.4.1.13 The Project would deliver a range of significant benefits. Fundamentally, the Project would aid in the meeting of the following national aims by providing up to 3GW of offshore renewable energy:

- UK Government's Clean Power 2030 - aim for 43-50GW of offshore wind capacity by 2030, with a further target of 72-89GW of offshore wind capacity by 2035;
- Draft Energy Strategy and Just Transition Plan 2023 - aim for Scotland to hit at least 20GW of renewable electricity generation capacity by 2030; and

- Offshore Wind Policy Statement 2020 and Consultation and 2025 Update - aim of 40 GW of new offshore wind capacity by 2035-2040, highlighting a continued and future demand for offshore wind development.

7.4.1.14 The Project would also aid in strengthening the Floating Offshore Wind (FLOW) supply chain and industry within Scotland, helping to ensure this industry can continue to grow and help play its part in meeting the energy demands of Scotland and wider UK. The Project would deliver significant benefits in terms of injecting money and investment into the local area and in a wider view, the Project could aid in the reduction of electricity prices as the electricity market becomes less reliant on expensive forms of energy generation. Furthermore, the Project would fundamentally support Scotland and the UK's electricity network transition away from GHG producing electricity generating methods. This helps to reduce the UK's contribution to climate change and overall helps to combat the ongoing climate crisis.

7.4.1.15 The offshore consenting applications for the Project are supported by a **Derogation Case**, which confirms there are IROPI for authorising consent and proceeding with the Project and no alternative solutions which satisfy the Project's objectives. The Derogation Case also identifies relevant compensation mechanisms and measures to address any necessary compensation to protect and benefit the UK National Site Network. This means that the offshore consenting applications for the Project can be approved under the Habitats Regulations through the Scottish Ministers granting their own Derogation Case for the project at the time of issuing the requisite consents and licences.

7.5 Overall conclusions

7.5.1.1 This Planning Statement demonstrates that national and local planning policy strongly supports the Project. It has assessed the Project against the relevant policies of Scotland's National Marine Plan (2015) and NPF4 and has been informed by the contents of the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) and Draft Updated Sectoral Marine Plan (Scottish Government 2025a). The Planning Statement has also been informed by the assessments within the accompanying EIA Report. This approach ensures that due regard has also been given to the duties set out under s.36 and Schedule 9 of the Electricity Act 1989.

7.5.1.2 **Section 3** establishes the clear need for, and benefits of, the Project, highlighting its contribution to national and local climate and energy objectives, socio-economic growth, and the delivery of strategic renewable energy infrastructure. The Project will support Scotland's transition to net zero emissions and deliver significant economic and community benefits.

7.5.1.3 The Planning Statement's planning assessment is set out in **Section 6**. The relevant policies and various offshore EIA aspect chapters' findings are outlined, alongside an assessment of each theme against the requirements of national policy. The section concludes that the Project is supported by, and in accordance with, the relevant policies of Scotland's National Marine Plan (2015) and NPF4 and has been informed by the contents of the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a) and Draft Updated Sectoral Marine Plan (Scottish Government 2025a). In the Scottish Ministers' consideration of these effects, when determining the application, it should first be recognised that the Project is a National Development. As such, the Project benefits from strong in principle support with a presumption in favour of development. Significant weight should also be given to the renewable energy and GHG reduction benefits of the scheme, as required by NPF4 Policies 1 and 11 and other relevant policies.

7.5.1.4 **Section 7** balances the planning assessment findings, concluding that whilst a limited number of **Significant** adverse effects are anticipated, given the nature of these effects, alongside the mitigation, compensation and environmental measures proposed, the Project is not considered to give rise to any policy non-compliance issues. Moreover, the Project's significant beneficial effects, related to GHG emissions reduction and socio-economics, confirm the value of the Project. Therefore, on balance, this section concludes that, despite the potential residual significant adverse effects, the Project's overall social, environmental and economic benefits, as well as wider compliance with policy requirements, confirms the benefit of the Project.

7.5.1.5 Overall, the Project receives strong support from national policy and relevant considerations and is therefore considered to be acceptable in planning terms. Accordingly, a decision to grant consent under s.36 of the Electricity Act for the Project and approval of the requested marine licences would be in accordance with national policy.

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9. Glossary of Terms and Abbreviations

9.1 Abbreviations

Acronym	Definition
AAI	Areas of Archaeological Interest
AEoSI	Adverse Effects on Site Integrity
CBRA	Cable Burial Risk Assessment
CEA	Cumulative Effects Assessment
CEF	Cumulative Effects Framework
CEMP	Outline Construction Environment Management Plan
CES	Crown Estate Scotland
CMS	Outline Construction Method Statement
CNP	Critical National Priority
CPO	Compulsory Purchase Order
DESNZ	Department for Energy Security and Net Zero
DID	Drop-In Day
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
EIA Report	Environmental Impact Assessment Report
EMF	Electromagnetic Field
EMP	Environmental Management Plan
FLO	Fisheries Liaison Officer
FLOW	Floating Offshore Wind
FMMCP	Fisheries Mitigation, Monitoring and Communication Plan
FTE	Full-time equivalents
FUE	Follow-up Exercise
GHG	Greenhouse Gas
GVA	Gross Value Added
GW	Gigawatts

Acronym	Definition
HDD	Horizontal Directional Drilling
HND	Holistic Network Design
HRA	Habitat Regulations Assessment
HVAC	Heating, Ventilation, and Air Conditioning
HVDC	High-Voltage Direct Current
IIP	Infrastructure Investment Plan
IMO FSA	international Maritime Organisation Formal Safety Assessment
INNS	Invasive Non-Native Species
INTOG	Innovation and Targeted Oil and Gas
IROPI	Imperative Reasons of Overriding Public Interest
km	Kilometre
KPI	Key Performance Indicators
m	metre
MD-LOT	Marine Directorate – Licensing Operations Team
MHWS	Mean High Water Springs
ML	Marine Licence
ML1	Marine Licence 1 for full 3GW generation assets, Phases 1 - 3
ML2	Marine Licence 2 for transmission assets, Phase 1
ML3	Marine Licence 3 for transmission assets, Phase 2
ML4	Marine Licence 4 for transmission assets, Phase 3
MLWS	Mean Low Water Springs
MOD	Ministry of Defence
MPCP	Marine Pollution Contingency Plan
MPS	Marine Policy Statement
MSFD	Marine Strategy Framework Directive
MW	megawatt
NESO	National Electricity System Operator
NCMPA	Nature Conservation Marine Protected Area
nm	Nautical miles

Acronym	Definition
NMP2	National Marine Plan 2
NPF4	National Planning Framework 4
NPP	Nature Positive Plan
NPS	National Policy Statement
NSN	Nature Sensitive Network
OA	Option Agreement
OAA	Option Agreement Area
OFTO	Offshore Transmission Operator
O&M	Operation & Maintenance
PAC	Pre-Application Consultation
PAN	Planning Advice Note
PETF	Peterhead Energy Transition Forum
PPiP	Planning Permission in Principle
PPS	Planning Position Statement
RIAA	Report to Inform Appropriate Assessment
s.36	Section 36
SCDS	Supply Chain Development Statement
SDC	Subsea distribution centres
SEA	Strategic Environmental Assessment
SEAP	Socio-Economic Action Plan
SPA	Special Protection Areas
SPP	Scottish Planning Policy
SSEN	Southern Electricity Networks
SPR	Scottish Power Renewables
UK	United Kingdom
UXO	Unexploded Ordnance
WTGs	Wind Turbine Generators

9.2 Glossary of terms

Term	Description / commentary (if applicable)
Aberdeenshire Council	One of 32 divisions of Scotland, designated as a Council area for the purposes of local government, covering Aberdeenshire.
Climate change	A long-term trend in the variation of the climate resulting from changes in the global atmospheric and ocean temperatures and affecting mean sea level, wave height, period and direction, wind speed and storm occurrence.
Climate Change Act	Legislation enacted in 2008 by the UK Parliament to establish a framework for the reduction of GHG, which includes a target for the year 2050 emissions, a system of carbon budgeting, establishing the Committee on Climate Change, carbon trading schemes and other provisions.
EIA Regulations	Terminology used in this EIA Report to refer to four sets of regulations: • The Electricity Works (EIA) (Scotland) Regulations 2017; • The Marine Works (EIA) (Scotland) Regulations 2017; • The Marine Works (EIA) Regulations 2007; and • The Town and Country Planning (EIA) (Scotland) Regulations 2017.
Environmental Impact Assessment	The process of evaluating the likely significant environmental effects of a proposed project or development over and above the existing circumstances (or 'baseline').
Environmental Impact Assessment Report	The outcome of the EIA process is reported within a document called an EIA Report.
Impact	The changes resulting from an action.
Likely Significant Effects	It is a requirement of EIA Regulations to determine the likely significant effects of the Project on the environment which should relate to the level of an effect and the type of effect.
Marine Directorate Licensing Operation Team	The regulator for determining marine licence applications on behalf of the Scottish Ministers in the Scottish inshore region (between 0 and 12 nautical miles) under the Marine (Scotland) Act 2010, and in the Scottish offshore region (between 12 and 200 nautical miles) under the Marine and Coastal Access Act 2009.
Marine licence	Licence required for certain activities in the marine environment and granted under either the Marine and Coastal Access Act 2009 or the Marine (Scotland) Act 2010.
Marine Policy Statement	The framework for preparing Marine Plans and taking decisions affecting the marine environment in the UK.
Marine Directorate	Civil service directorate for Scotland, which is responsible for the integrated management of Scotland's seas.
MarramWind Limited ('the Applicant')	MarramWind Limited is a subsidiary of ScottishPower Renewables UK Limited.

Term	Description / commentary (if applicable)
Mean High Water Springs	The average throughout a year of the heights of two successive high waters during those periods of 24 hours (approximately once a fortnight) when the tidal range is greatest.
Mean Low Water Springs	The average throughout a year of the heights of two successive low waters during those periods of 24-hours (approximately once a fortnight) when the tidal range is greatest.
National Planning Framework 4	The fourth National Planning Framework (NPF4) is a long term plan for Scotland looking to 2045. It guides spatial development, sets out national planning policies, designates national developments and highlights regional spatial priorities. It forms part of the statutory Development Plan.
National Policy Statements	National Policy Statements are statutory documents published in accordance with the Planning Act 2008. They set out the UK government's policy on, and the national need for specific types of nationally significant infrastructure projects. NPSs relevant to energy generation include: • Overarching National Policy Statement for Energy (EN-1) (Department for Energy Security & Net Zero, 2023a); • National Policy Statement for Renewable Energy (EN-3) (Department for Energy Security & Net Zero, 2023b); and • National Policy Statement for Electricity Networks Infrastructure (EN-5) (Department for Energy Security & Net Zero, 2023c).
NatureScot	Formerly known as Scottish Natural Heritage, NatureScot is a public body and government advisor responsible for Scotland's natural heritage, in particular for its natural, genetic and scenic diversity.
Offshore	Pertaining to the seaward side of MLWS, and typically in reference to locations some distance from the coast.
Offshore Wind Farm	An offshore wind farm is a group of wind turbines in the same location (offshore) in the sea which are used to produce electricity.
Onshore	Pertaining to the landward side of MLWS.
Plan Option	Term used for the seabed areas identified in the Sectoral Marine Plan for offshore wind development in the ScotWind leasing round.
Planning permission in Principle	Planning permission granted under the Town and Country Planning (Scotland) Act 1997 for all Project infrastructure located landward of the Mean Low Water Spring (MLWS).
Scoping Opinion	A Scoping Opinion is adopted by the Planning Authority and Scottish Ministers for a proposed project.
Scoping Report	A report that presents the findings of an initial stage in the EIA process.
Scottish Ministers	The devolved government of Scotland.
ScottishPower Renewables UK Limited	Part of the Iberdrola group and 100% owner of MarramWind Limited.

Term	Description / commentary (if applicable)
Section 36 Consent	Consent that can be granted under s.36 of the Electricity Act 1989 for the construction or extension, and operation, of an electricity station.
Special Protection Area	Sites designated under EU Directive (79/409/EEC) to protect habitats of migratory birds and certain threatened birds under the Birds Directive.
Sustainability	The principle that the environment should be protected in such a condition and to such a degree that ensures new development meets the needs of the present without compromising the ability of future generations to meet their own needs.
The Applicant	MarramWind Limited.
The Project	The MarramWind Offshore Wind Farm is a proposed floating offshore wind farm located in the North Sea, with a grid connection capacity of up to 3 gigawatts (GW).

Appendix A Key Considerations for Conditions

Condition theme	Phasing of generation infrastructure
Phasing Plan	Plan to outline the phasing of all construction works which the discharge of all other conditions should link to. Should the phasing of development require to be amended or updated then a revised phasing plan would be submitted for the written approval of the MD-Lot. Proposed condition phrasing: *A Phasing Plan outlining details of the phasing of all construction works and operational arrangements should be submitted to MD-Lot for approval. Thereafter, the development shall be undertaken in accordance with the approved Phasing Plan. The commencement of development of works related to any phase of development shall not begin until such time as all of the relevant conditions pertaining to that phase of the development have been discharged as referred to within the s.36 consent.*
Layout and Specification Plan	Details of the layout, siting and design of the extent of development proposed and corresponding to a defined phase or phases as set out in the Phasing Plan. It should be noted that at the time of submitting a Layout and Specification Plan for Phase 1 Generation Infrastructure, the detailed design of future phases will not be known. Once the detailed design is approved for the first phase, the Layout and Specification Plan will be updated and resubmitted for approval in respect of future phases at the appropriate time.
Detailed Surveys & Assessments	Detailed surveys and assessments undertaken for the extent of development proposed and corresponding to a defined phase or phases to be set out in the Phasing Plan.
Implementation and Environmental Plans	The current suite of outline implementation plans which support the consenting applications will, post-consent, be converted into detailed plans and it is expected that some of these will be secured under condition. The detailed plans will be project-wide or phase specific, or a combination of both, depending on the subject matter and this must be reflected in corresponding conditions. EIA mitigation measures will be delivered through a series of plans, as outlined in the accompanying Commitments Register (see **Volume 3, Appendix 5.2** of the EIA Report).

MarramWind