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Environmental Impact Assessment Report
Volume 3, Appendix 5.1: Stakeholder Issues Responses
MarramWind Offshore Wind Farm

December 2025

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Contents

1.	Introduction	3
2.	References	71
3.	Glossary of Terms and Abbreviations	72
3.1	Abbreviations	72
3.2	Glossary of terms	72

Table 1.1 Stakeholder issues responses – Introduction	4
Table 1.2 Stakeholder issues responses – Legislative and Policy Context	9
Table 1.3 Stakeholder issues responses – Site Selection and Consideration of Alternatives	20
Table 1.4 Stakeholder issues responses – Project Description	24
Table 1.5 Stakeholder issues responses – Approach to the EIA	39

Appendix A	
Table A1 Project design evolution and Scoping validity	76

1. Introduction

- 1.1.1.1 This Appendix provides responses to the key issues raised during statutory and non-statutory consultation of the MarramWind Offshore Wind Farm (hereafter referred to as ‘the Project’) that are of relevance to the following chapters in **Volume 1** of the Environmental Impact Assessment (EIA) Report:
- **Chapter 1: Introduction** (see **Table 1.1**);
 - **Chapter 2: Legislative and Policy Context** (see **Table 1.2**);
 - **Chapter 3: Site Selection and Consideration of Alternatives** (see **Table 1.3**);
 - **Chapter 4: Project Description** (see **Table 1.4**); and
 - **Chapter 5: Approach to the EIA** (see **Table 1.5**).
- 1.1.1.2 **Table 1.1** to **Table 1.5** details how each comment has been addressed within this EIA Report.
- 1.1.1.3 The tables set out the relevant stakeholder that has provided a comment or otherwise responded to the Project, states a unique stakeholder issue ID number that has allowed the Project to track progress against the issue raised, the date and forum through which the issue or comment was raised.
- 1.1.1.4 Each table includes a statement that sets out how the EIA Report has addressed it. In some cases, this is a sign-post to where further information can be found in the EIA Report. In other cases, this statement describes the approach that has been taken, or simply acknowledges the point raised where no action has been necessary.
- 1.1.1.5 Stakeholder issues relating to technical EIA aspects are reported upon in the appendices of the relevant EIA Report chapters.

Table 1.1 Stakeholder issues responses – Introduction

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this addressed in the EIA Report
Marine Directorate – Licensing Operations Team (MD-LOT)	249	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<p><i>“Introduction</i></p> <p><i>1.1.4 In examining the EIA Report, and any other environmental information, the Scottish Ministers will seek to reach an up-to-date reasoned conclusion on the significant effects on the environment from the Proposed Development. This reasoned conclusion will be considered as up to date if the Scottish Ministers are satisfied that current knowledge and methods of assessment have been taken account of. For the avoidance of doubt, this Scoping Opinion does not preclude the Scottish Ministers from requiring the Developer to submit additional information in connection with any EIA Report submitted with an application for consent under section 36 (“s.36 consent”) of The Electricity Act 1989 (“the 1989 Act”) and marine licences under The Marine (Scotland) Act 2010 (“the 2010 Act”) and The Marine and Coastal Access Act 2009 (“the 2009 Act”).”</i></p>	This EIA Report has been produced in support of Scottish Ministers such that they have adequate information to make an up-to-date reasoned conclusion on the likely significant effects on the environment from the Project within Volume 1, Chapters 6 to 33 .
	250	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<p><i>“Introduction</i></p> <p><i>1.1.5 In the event that the Developer does not submit applications for a s.36 consent under the 1989 Act and marine licences under the 2010 Act and the 2009 Act for the Proposed Development within 12 months of the date of this Scoping Opinion, the Scottish Ministers strongly recommend that the Developer seeks further advice from them regarding the validity of the Scoping Opinion.”</i></p>	In January 2024, the Applicant informed MD-LOT that given uncertainty with the grid connection and project timescales, the application submission date would extend beyond 12 months from the receipt of the Scoping Opinion. MD-LOT noted no immediate concerns with the Section 36 (s.36) being submitted more than 12 months from receipt of the EIA Scoping

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	274	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"2.5.16 It is a matter for the Developer, in preparing the EIA Report, to consider whether it is possible to robustly assess a range of impacts resulting from many undecided parameters. If the Proposed Development or any associated activities materially change prior to the submission of the EIA Report, the Developer may wish to consider requesting a new Scoping Opinion."</i>	Opinion and provided advice stating that the Applicant should ensure: <ul style="list-style-type: none"> the cumulative projects considered in Volume 1, Chapter 33: Cumulative Effects Assessment are current as of the submission date and include within the six months preceding submission; the Applicant should seek to validate their Scoping Opinion and include justification to this at application stage.
	697b	18 May 2022, Meeting.	<i>"MD-LOT queried on the timing of the EIA Report after scoping and the validity of Marine Scotland's Scoping Opinion (valid for a year once issued). If the EIA Report was to come in after that time, there might need to be some validation exercise undertaken. Marine Scotland has taken learning from previous leasing rounds that the Scoping Opinion needs to be accurate, particularly in relation to cumulative effects given the volume of project under ScotWind."</i>	It is noted that MD-LOT have now removed original guidance that set out the advisory requirement to submit s.36 consent within 12 months of receipt of EIA Scoping Opinion.
	727	15 January 2024, Meeting.	<i>"The Scoping Opinion was received in May 2023. However, given the uncertainty with the grid connection and project timescales, the application submission date may extend beyond 12 months from the receipt of the Scoping Opinion.</i> <i>MD-LOT will not validate the Scoping Opinion. The Project should seek to validate their Scoping Opinion and include justification at application stage. There will be formal opinion from MD-LOT on whether the Project should re-scope. Response from MD-LOT acknowledged that MarramWind intends to issue formal letter to MD-LOT confirming anticipated submission date. This letter will also confirm MarramWind view</i>	Notwithstanding this point, the project retains the view that the project being assessed within the EIAR has not materially changed from that considered at EIA Scoping stage. The Applicant has included commentary within Appendix A to explain that there is no material change in the project from EIA Scoping Stage. Whilst flexibility is being retained within the EIA design envelope, the Project area has been significantly

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this addressed in the EIA Report
			<i>with regard to Scoping Opinion validity and will be issued at the start of Q2 2024."</i>	refined from the Scoping stage. The Applicant has also undertaken further surveys to ensure data validity at the point of EIA submission (see Volume 1, Chapter 15: Shipping and Navigation).
	730	21 March 2023, Meeting.	<i>"MarramWind referenced the discussion in January 2024 quarterly update regarding Scoping validity following the decision to the consent submission for MarramWind. MarramWind reaffirmed that they will submit a formal letter regarding Scoping validity to MD-LOT in April 2024. MD-LOT reiterated that MD-LOT will not respond to this letter and ask that the EIA Submission includes a section that explains why the Scoping Opinion remains valid."</i>	
	251	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Introduction 1.1.6 The Scottish Ministers advise that as more than one set of environmental impact assessment regulations apply the most stringent requirements must be adhered to in terms of, for example, consultation timelines and public notice requirements."</i>	Four sets of EIA Regulations are applicable to the Project comprising of: The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017; The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017; the Marine Works (Environmental Impact Assessment) Regulations 2007; and Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017. These have been reviewed with the most stringent requirements adhered to within this EIA Report.
Scottish Fishermen's Federation (SFF)	606	12 May 2025, MD-LOT Scoping Opinion Appendix 1 (Scottish	<i>"Starting with the Introduction, para 1.1 the project must give clarity pre-consent to the decision making process for a 50/50 Joint Venture, to ensure there are no hold ups in the communications lines with stakeholders. Then in para 1.2 we are concerned by the statement that the impacts scoped will be based on "existing evidence", will that be sufficient? Table</i>	The Applicant is a company 100% owned by ScottishPower Renewables Limited. This EIA Report comprises of four volumes: <ul style="list-style-type: none"> Volume 1: EIA Report chapters:

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		Government, 2023).	<i>1.3.1 highlights the fact that there are 2 (two) separate licences, Onshore and Offshore, being applied for, but still proposes to do 1 (one) EIA to cover both, which may or may not be convenient for the project, but is inconvenient for consultees."</i>	<ul style="list-style-type: none"> ▶ Chapters 1 to 5 – introductory chapters; ▶ Chapters 6 to 18 – offshore chapters; ▶ Chapters 19 to 27 – onshore chapters; ▶ Chapters 29 to 34 – whole-project chapters; • Volume 2: EIA Report figures; • Volume 3: EIA Report appendices; and • Volume 4: Implementation Plans. <p>The Scoping Report and EIA Report are presented for the whole Project to ensure a holistic approach to EIA reporting and environmental management.</p>
Aberdeenshire Council	21	22 March 2023, Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023).	<i>"I refer to your request for a scoping opinion for the above proposal received on 30 January 2023. I would like to thank you again for agreeing to the time extension requested by the Council, it is very much appreciated. Unfortunately I am still waiting for a consultation response from the MOD, however I am now in receipt of all other responses. As such, I can now offer a scoping opinion under Regulation 17 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the Regulations) and will provide an addendum including the MOD comments around 05 April 2023."</i>	This comment is acknowledged.
	22	22 March 2023,	<i>"Schedule 4 of the Regulations states the information which should be included in an Environmental Impact Assessment</i>	The EIA Report has been produced in accordance with the relevant EIA

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		Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023).	<i>Report (EIA Report). These guidelines offer the backbone to the structure of an EIA Report and should be used as the basis for your submission."</i>	Regulations. Further detail on how the EIA Regulations have been adhered to is provided in Volume 1, Chapter 2: Legislative and Policy Context . Volume 1, Chapter 5: Approach to the EIA sets out the overarching EIA methodology, with further details and any necessary variations to the methodology set out in Volume 1, Chapters 6 to 33 .
	28	22 March 2023, Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023)	<i>"Comments on specific chapters, including those made from internal and external consultees are provided below. Please note, that given the extent of the scoping area in some instances consultees have not provided detailed advice. Once the site area has been refined, the Planning Service would recommend engaging with some of the Services to obtain more detailed advice."</i>	This comment is acknowledged and consultation with the respective consultees has been undertaken. Further detail on stakeholder engagement can be found in Volume 1, Chapter 5 Approach to the EIA and also within the respective technical aspect chapters (see Volume, 1, Chapters 6 to 33).

Table 1.2 Stakeholder issues responses – Legislative and Policy Context

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
MD-LOT	391	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“6.1.1 The EIA Report must be in accordance with the EIA Regulations and the Scottish Ministers draw your attention in particular to, regulation 6 of the 2017 MW Regulations, regulation 5 of the 2017 EW Regulations and regulation 12 of the 2007 MW Regulations. In accordance with the EIA Regulations, the Scottish Ministers advise that the EIA Report must be based on this Scoping Opinion.”</i>	<p>The EIA Report has been prepared in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, the Marine Works (Environmental Impact Assessment) Regulations 2007, the Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017, and the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.</p> <p>It is based on the Scoping Opinion issued by MD-LOT (on behalf of Scottish Ministers) and Aberdeenshire Council, following submission of the Scoping Report in January 2023. The scope and structure of the assessment reflect feedback received from statutory consultees and stakeholders during the Scoping process, ensuring that all relevant environmental aspects are appropriately addressed.</p>
	392	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“6.1.2 The Scottish Ministers note the need to carry out an assessment under the Conservation (Natural Habitats, &c.) Regulations 1994 and the Conservation of Offshore Marine Habitats and Species Regulations 2017. This assessment must be coordinated with the EIA in accordance with the EIA Regulations.”</i>	<p>A Habitats Regulations Appraisal (HRA) Screening Report was submitted to MD-LOT on 15 August 2024 (MarramWind Limited, 2024). This HRA Screening Report considered the potential for likely significant effects on European sites and supported early engagement with the competent authority.</p> <p>In accordance with the Conservation (Natural Habitats, &c.) Regulations 1994 and the Conservation of Offshore Marine Habitats and Species Regulations 2017, a Report to Inform Appropriate Assessment (RIAA) has been prepared and is submitted alongside the EIA Report as a separate document. The RIAA has been developed in coordination with the EIA to ensure consistency in the assessment of potential environmental effects and to support the competent authority in undertaking its obligations under the Habitats Regulations.</p>

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				The approach to the RIAA has been informed by the Scoping Report submitted in January 2023 and the Scoping Opinion received from MD-LOT and Aberdeenshire Council. Feedback from statutory consultees and stakeholders has also been incorporated to ensure the assessment is robust and proportionate.
NatureScot	441	12 May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>“Policy context We are currently facing two crises, that of climate change and biodiversity loss and as the Scottish Government’s adviser on nature, our work seeks to inspire, enthuse and influence others to manage our natural resources sustainably. We recognise that this proposal is a lease awarded through the ScotWind process in an area identified in the Sectoral Marine Plan for Offshore Wind.”</i>	The dual climate and nature crises are recognised and addressed in Volume 1, Chapter 2: Legislative and Policy Context and Appendix 2.1: Planning Policy Framework of the EIA Report. The above chapter and appendix consider National Planning Framework 4 (NPF4) Policies 1 and 2, and their principles are embedded throughout the EIA, ensuring that the Project is assessed and delivered in a way that is responsive to both the climate emergency and biodiversity loss.
SFF	611	12 May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>“Table 3.5.2 on P3.14 does give sight of Scotland’s National Marine Plan, but in the appendix 3A misses the opportunity to give clarity on their ambition for co-existence, social benefits, fairness and engagement in the General Policies, and in the fishing specific policies misses out on natural & cultural heritage, tourism and biodiversity.”</i>	Appendix 3A from the Scoping Report (MarramWind Limited, 2023) has been updated to ensure that the points raised are appropriately addressed (see Appendix 2.1: Planning Policy Framework). This includes clearer articulation of Scotland’s National Marine Plan ambitions regarding co-existence, social benefits, fairness, and engagement within the General Policies, as well as the inclusion of natural and cultural heritage, tourism, and biodiversity within the fishing-specific policies.
Aberdeenshire Council	30	22 March 2023, Aberdeenshire Council’s Scoping Opinion	<i>“The Council notes the extensive list of climate legislation and policies and energy policies to be included within an EIAR. You may wish to consider the Draft Energy Strategy and Just Transition Plan</i>	Volume 1, Chapter 2: Legislative and Policy Context (Table 2.3) includes reference to the Draft Energy Strategy and Just Transition Plan and a summary of the publication’s vision and purpose. Table 2.3 in Appendix 2.1: Planning Policy

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		(Aberdeenshire Council, 2023).	<i>which was published in January 2023 for consultation as in time, this will supersede the Scottish Energy Strategy (2017)."</i>	Framework , also references the Draft Energy Strategy and Just Transition Plan.
	31	22 March 2023, Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023).	<i>"It is understood that this scoping report was written and submitted prior to the adoption of National Planning Framework 4 (NPF4) on 13 February, 2023. This has the effect that all strategic development plans and any supplementary guidance issued in connection with them cease to have effect on that date. As such the Aberdeen City and Shire Strategic Development Plan 2020 now does not form part of the development plan. The NPF4 along with the Aberdeenshire Local Development Plan 2023 now form the development plan and is therefore a significant material consideration in the decision making process."</i>	Volume 1, Chapter 2: Legislative and Policy Context provides an overview of the relevant legislative and policy context. The relevant national planning policies and guidance are discussed in Section 2.5.2, with the relevant local planning policies and guidance set out in Section 2.5.4 of Volume 1, Chapter 2: Legislative and Policy Context . Reference to the Aberdeen City and Shire Strategic Development Plan 2020 is not included, with this having been superseded by the NPF4 and Aberdeenshire Local Development Plan (LDP) 2023.
	32	22 March 2023, Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023).	<i>"The most relevant policies of NPF4 you may wish to consider within an EIA include: Policy 1: Tackling the climate and nature crises Policy 3: Biodiversity Policy 4: Natural Places Policy 5: Soils Policy 6: Forestry, woodland and trees Policy 7: Historic assets and places Policy 10: Coastal development Policy 11: Energy Policy 20: Blue and green infrastructure"</i>	The relevant policies from NPF4 are outlined in Table 2.2 of Appendix 2.1: Planning Policy Framework of the EIA Report. We confirm that all relevant NPF4 policies have been reviewed and considered as part of the planning policy assessment, including those listed in your response such as climate and nature crises, biodiversity, natural places, energy, flooding, and rural development.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>Policy 22: Flood risk and water management</i> <i>Policy 23: Health and safety</i> <i>Policy 29: Rural development”</i>	
	33	22 March 2023, Aberdeenshire Council’s Scoping Opinion (Aberdeenshire Council, 2023).	<p>“You have correctly noted the Aberdeenshire Local Development Plan 2023 was adopted on 13 January 2023. You may wish to consider the below LDP 2023 policies within a future EIAR.</p> <p><i>Policy R1 Special Rural Areas</i> <i>Policy R2 Development Proposals Elsewhere in the Countryside</i> <i>Policy P1 Layout, Siting and Design</i> <i>Policy E1 Natural Heritage</i> <i>Policy E2 Landscape</i> <i>Policy E3 Forestry and Woodland</i> <i>Policy HE1 Protecting Listed Buildings, Scheduled Monuments and Archaeological Sites</i> <i>Policy PR1 Protecting Important Resources</i> <i>Policy PR2 Reserving and Protecting Important Development Sites</i> <i>Policy PR3 Reuse, Recycling and Waste</i> <i>Policy C2 Renewable Energy</i> <i>Policy C3 Carbon Sinks and Stores</i> <i>Policy C4 Flooding</i> <i>Policy RD1 Providing Suitable Services.”</i></p>	The relevant policies from the Aberdeenshire LDP 2023 are outlined in Table 2.4 of Appendix 2.1: Planning Policy Framework . We confirm that all relevant LDP 2023 policies have been reviewed and considered as part of the planning policy assessment, including those listed in your response relating to natural heritage, landscape, renewable energy, flooding, and suitable services, among others.
Scottish Environment Protection	143	12 March 2023, Aberdeenshire Council’s Scoping Opinion	<p><u>“Advice for the planning authority</u></p> <p><i>In line with the advice in the Transitional Arrangements for National Planning</i></p>	This is acknowledged. Volume 1, Chapter 2: Legislative and Policy Context provides an overview of the relevant legislative and policy framework, including the NPF4, which forms part of the statutory development plan following its adoption on 13

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Agency (SEPA)		Representation, (Aberdeenshire Council, 2023).	<i>Framework 4 letter, issued by the Chief Planner, Fiona Simpson, on 8 February 2023, that "From 13 February, on adoption and publication by Scottish Ministers, NPF4 will form part of the statutory development plan, along with the LDP applicable to the area at that time and its supplementary guidance. NPF4 will supersede National Planning Framework 3 and Scottish Planning Policy (SPP) (2014). NPF3 and SPP will no longer represent Scottish Ministers' planning policy and should not therefore form the basis for, or be a consideration to be taken into account, when determining planning applications on or after 13 February", our position and advice given below is based on the NPF4 policy."</i>	February 2023, in line with the Chief Planner's transitional arrangements letter dated 8 February 2023. The EIA Report does not rely on superseded policy documents such as NPF3 or Scottish Planning Policy (2014).
	150	12 March 2023, Aberdeenshire Council's Scoping Opinion Representation, (Aberdeenshire Council, 2023).	<i>"Policy 5 of National Planning Framework 4 (NPF4) states that "Development proposals will only be supported if they are designed and constructed: In accordance with the mitigation hierarchy ...".</i>	The requirement under NPF4 Policy 5 regarding the mitigation hierarchy is addressed in Volume 1, Chapter 3: Site Selection and Consideration of Alternatives . This chapter sets out how the site selection process embedded the mitigation hierarchy principles from the outset, ensuring that avoidance and minimisation of environmental effects were integral to the design evolution.
	168	12 March 2023, Aberdeenshire Council's Scoping Opinion Representation (Aberdeenshire Council 2023).	<i>"Advice for the applicant Regulatory advice Details of regulatory requirements and good practice advice, for example in relation to private drainage, can be found on the regulations section of our website. If you are unable to find the advice you</i>	Thank you for your advice. We will refer to the regulations section of the SEPA website for guidance on private drainage and other regulatory matters. Should we require further clarification, we will contact the local compliance team directly

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			<i>need for a specific regulatory matter, please contact a member of the local compliance team at: gs@sepa.org.uk.</i>	
Aberdeenshire Council	193	12 March 2023, Aberdeenshire Council's Scoping Opinion Representation (Aberdeenshire Council 2023).	<i>"Policies: ALDP 2023 - E1 Natural Heritage ALDP 2023 - E3 Forestry and Woodland ALDP 2023 - P1 Layout, siting and design ALDP 2023 - PR1 Protecting Resources."</i>	The policies noted have been included in Table 2.4 of Appendix 2.1: Planning Policy Framework .
MD-LOT	695b	Meeting, 20 July 2022.	MD-LOT highlighted the next stage is to integrate the Innovation and Targeted Oil and Gas (INTOG) plan and the Sectoral Marine Plan assessment in Q2 2023. The goal by the end of 2023 will be a full plan for all offshore wind.	<p>The Sectoral Marine Plan for Offshore Wind (2020) is considered in Volume 1, Chapter 2: Legislative and Policy Context and Appendix 2.1: Planning Policy Framework.</p> <p>We note that the Draft Updated Sectoral Marine Plan for Offshore Wind Energy was published for consultation by the Scottish Government on 30 May 2025. This updated plan, which integrates the ScotWind and INTOG leasing rounds, has been reviewed and relevant content incorporated into Volume 1, Chapter 2: Legislative and Policy Context and Appendix 2.1 prior to submission of the EIA Report, where appropriate. It has also been responded to specifically within Volume 1, Chapter 11: Marine Mammals; Volume 1, Chapter 14: Commercial Fisheries; and Volume 1, Chapter 15: Shipping and Navigation.</p>
Aberdeenshire Council	700	1 August 2023, Meeting.	<i>"Aberdeenshire Council confirmed they are comfortable with the Project's strategy to seek planning application in principle, noting the Hybrid PPiP. Aberdeenshire Council to be kept in the loop regarding timings of the planning application and</i>	On 21 November 2024, MarramWind held a formal pre-application meeting with Aberdeenshire Council officers, including the assigned case officer and relevant technical specialists. The meeting provided an overview of the project's consenting strategy and reaffirmed the intention to submit an application for Planning Permission in Principle (PPiP) for the

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			<i>subsequent AMSCs, noting that the assigned Aberdeenshire Council case officer will be available to provide advice as required."</i>	<p>onshore grid connection infrastructure. Key infrastructure components and associated parameters underpinning the PPiP application were discussed.</p> <p>A Pre-Application Advice Report was subsequently received from Aberdeenshire Council on 19 December 2024, advising that the PPiP application and associated assessments should consider the maximum extent of predicted development to ensure that the likely significant effects are appropriately assessed.</p> <p>The Applicant holds regular meetings with the assigned case officer, and is committed to keeping Aberdeenshire Council informed of the planning application progress and subsequent Approval of Matters Specified in Conditions (AMSC). We also welcome continued collaboration to define project conditions in advance, ensuring a transparent and coordinated approach to the application process."</p>
Aberdeenshire Council	902	19 December 2024, Aberdeenshire Council Pre-Application Advice Report (Aberdeenshire Council, 2024).	<p><u>"Planning Service</u> <i>At the time of writing it is noted that the intention is to submit an initial application for Planning Permission in Principle. The Planning Service would therefore expect that the Environmental Impact Assessment consider and assess the maximum extent of predicted development, in order to ensure that the maximum likely significant effects have been identified.</i></p> <p><i>Should the project lack sufficient detail at Planning Permission in Principle stage, it may become necessary to utilise the EIA</i></p>	<p>The findings presented in this EIA Report reflect the current stage of design development and baseline understanding. A precautionary approach has been applied throughout to ensure that the assessment captures a maximum design scenario, representing the reasonable worst-case for each environmental aspect. This ensures that the maximum likely significant effects are identified, in line with the expectations for PPiP.</p> <p>Each technical chapter (Volume 1, Chapters 6 to 33) outlines the specific worst-case scenario adopted for its assessment, acknowledging that some effects may be overstated at this stage and refined as the design progresses.</p> <p>The PPiP application seeks to establish the acceptability of the proposed land use and high-level development parameters</p>

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			<i>regulation provisions in respect of multi-stage consents."</i>	within a defined site boundary. Detailed design and implementation matters will be addressed through subsequent applications for AMSC, as permitted under the multi-stage consenting provisions of the EIA Regulations."
	903	19 December 2024, Aberdeenshire Council Pre-Application Advice Report (Aberdeenshire Council, 2024).	<p><i>"The application would be a national application. For applications falling within this category, there is a requirement on the applicant to carry out pre-application consultation with the community.</i></p> <p><i>Proposal of Application Notice</i> <i>The Town and Country Planning (Development Management Procedures) (Scotland) Regulations 2008 require that for any major or national development pre-application consultation must be undertaken. This requires a formal Proposal of Application Notice to be submitted to the Planning Authority at least 12 weeks prior to any formal planning application being lodged. Further information is available on the Council website.</i></p> <p><i>Public Consultation</i> <i>Public consultation should be undertaken as the proposals develop to help both gauging the opinion of the local community and also scoping potential areas of conflict which could be addressed prior to submission of the application. Pre-application consultation is required with the public and local community council(s). At least two public</i></p>	<p>Pre-application consultation has been undertaken in accordance with the Town and Country Planning Regulations 2008, as outlined in the Pre-application Consultation Report (PAC Report).</p> <p>PoAN notices were submitted to Aberdeenshire Council in accordance with required timelines as outlined in the PAC Report.</p> <p>Public consultation was undertaken to gauge opinion and scope areas of conflict and how they could be addressed. The consultation strategy met, and sought to exceed, the minimum statutory requirements for consultation. The four consultation periods incorporating six in-person events and four online events in total are outlined in the PAC Report.</p> <p>Events were publicised at least seven days in advance of the event. Publicity is outlined in the PAC Report. The PAC Report outlines the way in which the minimum statutory requirements for publicising the events were met and exceeded. The PAC Report details the dates of newspaper advertisements.</p> <p>A PAC Report has been produced to detail consultation undertaken, feedback received and how this has been incorporated into the Project. Consultation has been delivered in line with best practice guidelines including Planning Aid Scotland's SP=EED guidelines.</p> <p>Community Councils</p>

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			<p><i>consultation events must be held and publicised in the local press at least 7 days in advance of the event. Any subsequent planning application must be accompanied by a Pre-application Consultation Report detailing the consultation undertaken, feedback received and how this has been incorporated into the scheme.</i></p> <p><i>It is advisable to take into consideration all of the comments made by members of the public before a planning application is submitted to ensure that the public feel they have had an influence over the proposals. You need to conduct the pre-application consultation in line with our SP=EED (Successful Planning = Effective Engagement and Delivery) guidelines.</i></p> <p><i>Environmental Impact Assessment The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 requires that certain developments must be screened to determine whether an Environmental Impact Assessment (EIA) is required to support a planning application. A formal request for a screening should be made in writing to the Planning Authority.</i></p> <p><i>Community Councils In terms of the appropriate Community Councils to consult, the proposal is</i></p>	<p>Letters were issued to all relevant community councils during each round of statutory consultation as outlined in the PAC Report, which also outlines all stakeholders including all community councils contacted.</p>

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<p><i>located within the following Community Council areas:-</i> <i>Buchan East</i> <i>Longside & District</i> <i>Boddam & District</i> <i>Peterhead</i></p> <p><i>A development of the nature proposed may affect a number of adjacent Community Councils, as such it is recommended that the adjacent Community Councils are also consulted."</i></p>	
	904	19 December 2024, Aberdeenshire Council Pre-Application Advice Report (Aberdeenshire Council, 2024).	<p><i>"Processing Agreements</i></p> <p><i>A processing agreement is a way of helping developers, the Council and relevant stakeholders work together through the planning process. It involves setting out the key stages involved in deciding a planning application, identifying what information is required from whom and setting timescales for various stages of the process.</i></p> <p><i>The Council actively encourages the use of processing agreements for energy, transmission, and infrastructure applications. You are advised to contact the Council's Strategic Delivery Development Team with a view to agreeing a Processing Agreement at the earliest possible opportunity. There is a charge for putting in place and managing</i></p>	<p>The Applicant recognises the value of entering into a Planning Processing Agreement (PPA) with Aberdeenshire Council, particularly in supporting collaborative working and providing clarity around planning stages, responsibilities, and timescales. We sought to initiate a PPA early in the planning process, understanding the benefits this approach offers to both developers and stakeholders.</p> <p>However, following discussions with the Council and in light of their availability at the time, it was mutually agreed that a formal PPA would not be pursued. Instead, we established a framework of regular meetings with the Case Officer, with Strategic Delivery Development Team attending as required, to ensure consistent engagement and progress tracking throughout the planning process. This approach has enabled constructive dialogue and alignment, while maintaining the collaborative spirit of a PPA. We remain committed to working closely with the Council and stakeholders.</p>

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>a processing agreement which is part of the Priority Determination Service offered by the Council."</i>	

Table 1.3 Stakeholder issues responses – Site Selection and Consideration of Alternatives

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
MD-LOT	275	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“The EIA Regulations require that the EIA Report include ‘a description of the reasonable alternatives (for example in terms of project design, technology, location, size, and scale) studied by the Developer, which are relevant to the proposed works and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects’. The Scottish Ministers acknowledge section 2.4 of the Developer’s Scoping Report confirming the EIA Report will set out the options considered for the Project and the main reasons for selecting particular options with the aim being to identify the best end-to-end solution from the connection point. The Scottish Ministers acknowledge that at this stage, the optioneering work in the offshore environment is more progressed than in the onshore environment due to the uncertainties presented regarding grid connection in this region. The Scottish Ministers advise that further consideration on other aspects, not just regarding the Project’s connection point, must be included in the EIA Report.</i>	Volume 1, Chapter 3: Site Selection and Consideration of Alternatives provides details of the design refinements following submission of the Scoping Report in January 2023. Volume 1, Chapter 4: Project Description describes the Project assessed in the EIA Report.
	276	12 May 2023, MD-LOT Scoping Opinion	<i>“For the avoidance of doubt, the Scottish Ministers advise that the EIA Report must include an up-to-date consideration of the</i>	Volume 1, Chapter 3: Site Selection and Consideration of Alternatives outlines the design evolution of the Project, detailing the site selection process, alternatives considered, and

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		(Scottish Government, 2023).	<i>reasonable alternatives studied as the parameters of the Proposed Development have been refined. The Scottish Ministers expect this to comprise a discrete section in the EIA Report that provides details of the reasonable alternatives studied across all aspects of the Proposed Development and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects."</i>	the rationale for the chosen option. It also highlights how consultation and environmental considerations have informed the refinement of the Project.
Aberdeenshire Council	23	22 March 2023, Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023).	<i>"In order to make an assessment of the above information there are specific criteria and guidance set out in Schedule 4 of the Regulations. In particular these include characteristics of the development, an outline of any alternative options/sites and the main reasons for the options/sites chosen."</i>	This EIA Report has been produced in accordance with the relevant EIA Regulations. Further detail on how the EIA Regulations have been adhered to is provided in Volume 1, Chapter 2: Legislative and Policy Context . Volume 1, Chapter 3: Site Selection and Consideration of Alternatives outlines any alternative options and sites that have been considered and the reasoning for why the options / sites were chosen and described in Volume 1, Chapter 4: Project Description .
	25	22 March 2023, Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023).	<i>"Detailed surveys would be required to inform the EIA Report."</i>	Details of the surveys conducted to inform the EIA Report are provided in Volume 1, Chapter 3: Site Selection and Consideration of Alternatives , and the technical aspect chapters (Volume 1, Chapters 6 to 33).
NatureScot	121	22 March 2023, Aberdeenshire Council's Scoping Opinion Representation	<i>"We note that the landfall search area covered by this scoping report extends from Sandhaven to Sandford Bay, south of Peterhead. There are currently 2 options for connection to the grid: A full</i>	Volume 1, Chapter 4: Project Description sets out the Project for which consent is sought. Volume 2, Figure 4.1: Onshore Red Line Boundary and indicative onshore infrastructure sets out the proposed landfall(s) and onshore export cable corridor.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		(Aberdeenshire Council, 2023).	<i>3GW connection in the vicinity of Peterhead; or a 1.5GW connection at Peterhead with the residual assumption of a 1.5GW connection to New Deer. The final landfall and cable connection route(s) will be selected prior to the EIA submission."</i>	
Ministry of Defence (MOD)	203	22 March 2023, Aberdeenshire Council's Scoping Opinion Representation (Aberdeenshire Council, 2023).	<i>"The applicant is seeking a scoping opinion on the proposed onshore infrastructure for Marram Wind Offshore Windfarm and has provided a scoping boundary for the infrastructure within the vicinity of Peterhead and New Deer. The applicant has provided an Environmental Impact Assessment- scoping report dated January 2023 which states that the details provided at this stage are indicative and are subject to further ongoing design refinements."</i>	Volume 1, Chapter 3: Site Selection and Consideration of Alternatives provides details of the design refinements following submission of the Scoping Report in January 2023. Volume 1, Chapter 4: Project Description describes the Project assessed in the EIA Report.
MD-LOT	222	22 September 2022, Meeting.	<i>"Lots of pipelines and cables come ashore in study area, looking to gain collaboration for data gathering with wider projects in ScotWind and wider industries. NatureScot would support."</i>	This comment is acknowledged.
Aberdeenshire Council	714	29 November 2023, Meeting.	<i>"Aberdeenshire Council mentioned the Fraserburgh Harbour masterplan, developed through SOWEC, and requested MarramWind to visit Fraserburgh Harbour to learn more about it."</i>	Ports are central to the development of offshore wind. We continue to engage with a range of key stakeholders – including ports operators, local authorities, the Scottish Government and its agencies – to explore options for port utilisation and stay abreast of plans for port expansion. Representatives from the Project met with Fraserburgh Harbour in November 2023 to discuss their master plan and the Project's needs. Further

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
				<p>subsequent engagement took place with Fraserburgh Harbour's Harbour Development Manager in October 2024 at a Project statutory consultation event in Peterhead.</p> <p>A range of facilities are being considered for the installation and operation of the Project, and the Applicant will continue to engage as and when appropriate to ensure a joined-up approach between Scottish ports and the requirements of offshore wind developers.</p>

Table 1.4 Stakeholder issues responses – Project Description

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
MD-LOT	257	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“Description of the Proposed Development 2.2.5 The Proposed Development will adopt a phased approach during construction. Commencement of onshore construction is currently anticipated to begin in 2027 with a duration of 2 to 3 years and commencement of offshore construction is anticipated to begin in 2030 and is anticipated to be up to 0 year (for 1GW) and 3 years (for remaining 2GW) (subject to final grid connection date, supply chain discussions and further pre-consent surveys). The overall duration of construction is anticipated to be up to 8 years. The Developer aims to have the first generating power (for 1GW) in 2031.”</i>	<p>The Applicant has advised MD-LOT of changes to the anticipated construction programme during Quarterly stakeholder engagement calls throughout 2024 and 2025. Volume 1, Chapter 4: Project Description sets out the construction programme as being 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).</p> <p>A shorter period within the 12 years is expected for construction of the onshore infrastructure; in the range of up to nine years. Volume 1, Chapter 4: Project Description also includes commentary of the requirement for phasing and retained flexibility within EIA Design Envelope.</p>
	259	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“2.4.1 The Scottish Ministers note that the project design of the proposed works lacks detail at this stage but acknowledge that the project design will be refined as further information is gained from surveys and responses from stakeholders and public engagement. The advice provided in this Scoping Opinion is proportionate to the level of detail provided in the Scoping Report. Section 2.2.1 of the Scoping Report states that the project description should be considered indicative to allow the identification of key parameters. The EIA Report must include a full and</i>	<p>Volume 1, Chapter 4: Project Description details the infrastructure, technology, and methodological options being considered by the Project that form the design envelope for EIA.</p>

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>detailed description of all options considered within the design envelope.”</i>	
	260	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<p>“2.4.2 Section 2.3.7 of the Scoping Report states that both the offshore and onshore elements of the scoping boundary will be further refined as ongoing engineering and environmental information is gathered and incorporated into the project design. The Scoping Report covers the whole Option Agreement Area (“OAA”) and multiple cable corridors and landfall sites for which further assessment is required. If the project design envelope is not refined further, consideration cannot be given to a worst-case scenario and the list of data sources, impact pathways, and mitigation that may require assessment could become unmanageable. In addition, throughout the Scoping Report reference is made to further refinement being undertaken after ongoing consultation. Although several consultees have welcomed this opportunity, ongoing consultation has the potential to be resource-intensive and the capacity of external agencies required for consultation cannot be guaranteed.”</p>	As anticipated, the Scoping boundary has been refined to create the Red Line Boundary for EIA (see Volume 2, Figure 4.2: Offshore Red Line Boundary). This has occurred in response to Statutory Consultation and wider engagement. Resource constraints within external agencies are acknowledged and the inputs received to external agencies is valued and appreciated by the Applicant.
	261	12 May 2023, MD-LOT Scoping Opinion (Scottish	<p>“2.4.3 Indicative [wind turbine generator] WTG parameters are provided in Table 2.3.3 of the Scoping Report. The Scottish Ministers acknowledge that the maximum parameters</p>	Volume 1, Chapter 4: Project Description sets out the design parameters of the Project, including for various options where flexibility is required within the design envelope. It also sets out the need for a phased approach to construction and energisation of the Project. The technical aspect chapters set

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		Government, 2023).	<i>are subject to further design review and the final layout of the wind farm components is to be determined. The Scottish Ministers advise that it must be clear in the EIA Report which parameters are being assessed. If the parameters have not yet been decided, the EIA Report must include a full and detailed description of all layout options considered within the design envelope."</i>	out the maximum design scenario relevant to each assessment, taking account of the options presented in the Volume 1, Chapter 4: Project Description .
	262	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"2.4.4 Regarding design options for the floating unit on which each WTG will be mounted, section 2.3.23 of the Scoping Report states that several options are being considered for the Proposed Development. It must be clear in the EIA Report which design option is being assessed. If the design option has not been decided, the EIA Report must include a full and detailed description of all layout options considered."</i>	Volume 1, Chapter 4: Project Description sets out the design parameters of the Project, including for various options where flexibility is required within the design envelope. The technical aspect chapters set out the maximum design scenario relevant to each assessment, taking account of the options presented in Volume 1, Chapter 4: Project Description .
	263	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"2.4.5 Section 2.3.27 of the Scoping Report lists the wide spectrum of anchoring and mooring solutions currently being considered for the Proposed Development. The EIA Report must provide details of the anchor and mooring design options being considered within the design envelope. The Scottish Ministers acknowledge the Developer's consideration of scour protection in section 2.3.37 of the Scoping</i>	Volume 1, Chapter 4: Project Description sets out the design parameters of the Project, including for various options where flexibility is required within the design envelope. This includes parameters relating to anchoring and mooring solutions, scour protection, and the export cable corridor. The technical aspect chapters set out the maximum design scenario relevant to each assessment, taking account of the options presented in Volume 1, Chapter 4: Project Description .

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>Report and highlight that any potential for scour protection to be used must be assessed in the EIA Report including details on materials, quantities, and locations. The EIA Report must also clearly describe the export cable area including the width, length, and location of both export cable corridors.”</i>	
	264	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“2.4.6 Burial techniques for the offshore export cable corridor are noted in section 2.3.52 of the Scoping Report, including ploughing, jetting, or trenching. If optimal burial depths are not achievable with these methods, and cable protection is required, such as rock placement or installation of concrete mattresses, this must be assessed in the EIA Report including details on materials, quantities, and location. The EIA Report must be clear on the range of burial depths that have been considered as part of the assessment. Additionally, the EIA Report must clearly detail the number and size of export cables to be installed. Where reliance is placed on a subsequent cable plan or cable burial risk assessment as mitigation, the EIA Report must explain how this measure will mitigate the effects, what measures are proposed for inclusion, and the effectiveness and degree of confidence that can be placed on such measure. It is recommended that such plans are included alongside the EIA Report. In addition, any</i>	Volume 1, Chapter 4: Project Description sets out the design parameters of the Project, including for various options where flexibility is required within the design envelope. This includes parameters relating to cable burial techniques, the export cables, and seabed preparation techniques. The technical aspect chapters set out the maximum design scenario relevant to each assessment, taking account of the options presented in Volume 1, Chapter 4: Project Description .

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>seabed levelling or removal of substance or objects from on or under the seabed, required for installation of both the inter-array cables and export cables, will require consideration in the EIA Report and may require a marine licence. Should seabed preparation involve dredging, the EIA Report must identify the quantities of dredged material and identify the likely location for deposit."</i>	
	265	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"2.4.7 Section 2.3.56 of the Scoping Report states that the final landfall location(s) for the offshore cable corridor has/have not yet been determined but several indicative options have been identified along the Aberdeenshire coastline to allow for the contingency scenario of a New Deer connection. Table 2.3.2 within the Scoping Report states that depending on the characteristics of the site, the burial technique of the offshore export cables can be an open cut and fill construction, horizontal directional drilling, or a cofferdam construction technique. Due to the uncertainty of the landfall location(s) and the techniques used to bury the cables, the range of impact pathways could vary greatly. The EIA Report must clearly detail each landfall location and state the site-specific considerations for each option. The EIA Report must also outline the steps</i>	The Project boundary (including areas relating to landfall) has been refined since Scoping. Open cut and fill and cofferdam construction techniques have also been excluded from the design envelope since Scoping. This is reported upon in Volume 1, Chapter 3: Site Selection and Consideration of Alternatives , where the landfall locations taken forward for EIA are also described. The relevant EIA technical aspect chapters assess and mitigate impacts to receptors at the landfalls.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>taken to mitigate any environmental impacts resulting from the cable landfall."</i>	
	267	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"2.4.9 Table 2.3.4 within the Scoping Report states that several OSP platforms may be required for the Proposed Development and that the OSP(s) will be installed on either 'fixed' foundations or floating platforms. The EIA Report must include a full and detailed description of all OSP options being considered including the design and size of the OSP(s) in the design envelope."</i>	Volume 1, Chapter 4: Project Description sets out the design parameters of the Project, including for offshore platforms. Floating platforms offshore substations have been excluded from the design envelope since Scoping. This is reported upon in Volume 1, Chapter 3: Site Selection and Consideration of Alternatives . The technical aspect chapters set out the maximum design scenario relevant to each assessment, taking account of the options presented in Volume 1, Chapter 4: Project Description .
	268	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"2.4.10 The Scottish Ministers acknowledge section 2.4.29 of the Scoping Report which mentions ongoing and upcoming pre-construction surveys, including geophysical, geotechnical, and benthic surveys. The Scottish Ministers advise that the EIA Report must describe and assess the environmental effects, including in-combination effects, of the range of additional surveys which may be required. The EIA Report must also include consideration of the options which will be assessed regarding potential unexploded ordnance ("UXO") clearance, the differences amongst them, and an assessment of the environmental effects of these options. In this regard, the Scottish Ministers advise that the EIA Report must include a worst-case scenario of high-order</i>	Surveys that have already been undertaken for the Project have been consented in line with relevant legislation in force. Application for consent to undertake future surveys such as those required at the pre-construction stage will be submitted at such future time that the details of these surveys are known. This will be undertaken as appropriate, outwith the EIA process for the construction, operation and decommissioning of the Project. Activities relating to any necessary UXO clearance are described in Volume 1, Chapter 4: Project Description . Impacts relating to these activities have been addressed where relevant in Volume 1, Chapter 10: Benthic, Epibenthic and Intertidal Ecology ; Volume 1, Chapter 11: Marine Mammals ; Volume 1, Chapter 13: Fish Ecology .

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>denotation in terms of impact and mitigation unless there is robust supporting evidence that can be presented to show the consistent performance of the preferred low-order or deflagration method."</i>	
	269	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"2.4.11 Section 2.3.101 of the Scoping Report confirms a decommissioning programme will be prepared and submitted to Scottish Ministers in line with sections 105 and 114 of the Energy Act 2004. The EIA Report must include an assessment of potentially significant effects during the decommissioning phase of the Proposed Development. Any uncertainty on the impacts upon receptors from activities during decommissioning should be clearly explained, along with the implications for the assessment of significant effects."</i>	A decommissioning programme will be prepared and submitted to Scottish Ministers in line with sections 105 and 114 of the Energy Act 2004 during the post-consent period. This has been discussed and agreed with MD-LOT during stakeholder engagement meetings in 2025. Each technical aspect EIA chapter (see Volume 1, Chapters 6 to 33) assesses potential impacts from the decommissioning stage on the identified receptors.
	271	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"2.4.13 The Scottish Ministers note the Developer's intention to apply a 'Design Envelope' approach. Where the details of the Proposed Development cannot be defined precisely, the Developer will apply a worst-case scenario, as set out in section 4.2.21 of the Scoping Report."</i>	Volume 1, Chapter 4: Project Description sets out the design parameters of the Project, including for various options where flexibility is required within the design envelope. The technical aspect chapters set out the maximum design scenario relevant to each assessment, taking account of the options presented in Volume 1, Chapter 4: Project Description .
	272	12 May 2023, MD-LOT Scoping Opinion (Scottish	<i>"2.4.14 The Scottish Ministers advise that the Developer must make every attempt to narrow the range of options. Where</i>	Volume 1, Chapter 4: Project Description sets out the design parameters of the Project, including for various options where flexibility is required within the design envelope. The technical aspect chapters set out the maximum design

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		Government, 2023).	<i>flexibility in the design envelope is required, this must be defined within the EIA Report, and the reasons for requiring such flexibility clearly stated. At the time of application, the parameters of the Proposed Development should not be so wide-ranging as to represent effectively different projects. To address any uncertainty, the EIA Report must consider the potential impacts associated with each of the different scenarios. The criteria for selecting the worst case and the most likely scenario, together with the potential impacts arising from these, must also be described. The parameters of the Proposed Development must be clearly and consistently defined in the applications for the marine licences and the accompanying EIA Report."</i>	scenario relevant to each assessment, taking account of the options presented in Volume 1, Chapter 4: Project Description .
	273	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"2.4.15 The Scottish Ministers will determine the applications based on the worst-case scenario. The EIA Report will reduce the degree of design flexibility required and the detail may be further refined in a Construction Method Statement ("CMS") to be submitted to the Scottish Ministers, for their approval, before works commence. Please note, however, the information provided in section 7 below regarding multi-stage regulatory approval. The CMS will 'freeze' the design of the project and will be reviewed by the Scottish Ministers to ensure</i>	The Project has provided Volume 4: Outline Construction Method Statement . This will be updated after detailed design post-submission.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>that the worst-case scenario described in the EIA Report is not exceeded."</i>	
BT	402	12 May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"For info see the active radio links (blue and purple lines) we have below within the onshore boundary. As there is no mention of structures of height onshore we could see within the documentation this should not affect our network. If these have been missed and there are any structures at height please advise and we will happily reassess."</i>	Volume 1, Chapter 4: Project Description provides information on the heights of onshore structures including building heights for electrical infrastructure and lightning protection masts.
Maritime and Coastguard Agency (MCA)	431	12 May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase, such as at the horizontal directional drilling location."</i>	The export cables will be buried 1m to 2m below the seabed for most of their length to the landfall(s), depending on the outcome of the cable burial risk assessment. The MCA's advice regarding 5% depth reduction is acknowledged.
NatureScot	446	MD-LOT Scoping Opinion Appendix 1 (Scottish	<i>Wet storage Wet storage could represent a very significant impact pathway with respect to floating wind. It is unclear from the scoping report if there are any plans for wet storage</i>	The use of wet storage is likely to be required for the storage of floating units (pre and post turbine integration) for the Project. This is considered to be outside the scope of this EIA and the marine licence applications for the offshore infrastructure.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		Government, 2023).	<i>of assembled and/ or component parts of floating turbines in the construction, and operation and maintenance phases, and what this would entail or potential locations identified. Consideration of wet storage, including potential impacts on receptors, needs to be addressed with the EIA and forthcoming HRA.</i>	<p>The port facilities to be used for MarramWind are still unconfirmed at this stage, although possible ports that may be suitable are referred to in Volume 1, Chapter 4: Project Description. The intent is that MarramWind will utilise port facilities, which will have appropriate consents for wet storage of floating units, fabrication and assembly with the Wind Turbine Generators (WTGs).</p> <p>Separate marine licences and associated impact assessments for wet storage areas outwith the Offshore Red Line Boundary will be applied for and undertaken as appropriate.</p>
SFF	607	12 May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>“Moving on to Ch2, para 2.2 and P4.8 para 4.2.19, whilst the fishing industry has come to terms with the “Rochdale envelope” approach giving projects much flexibility, the same should be given to the export cable corridor. This leads on to the fact that SFF can not accept that ongoing variations of the envelope are anything to do with benefitting the fishing industry (as in 4.2.21) Unless the project can quantify this benefit, it should be ignored.”</i>	This comment is acknowledged.
	608	12 May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>“Reference at 2.3.5 to Fig 1 in appendix A, is appreciated that the length of coastline in focus is ample, and now is the time to engage with fishers on the export cable route to utilise their knowledge of the seabed. Similarly, in 2.3.7, “optioneering” would be improved by incorporating fishers knowledge of seabed composition.”</i>	Regular engagement including Quarterly meetings have been held with the SFF and Scottish White Fish Producers Association, as well as wider periodic meetings with the Scottish Pelagic Fishermen’s Association. Input from fisheries representatives has directly informed the optioneering process reported upon in Volume 1, Chapter 3: Site Selection and Consideration of Alternatives .

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
	609	12 May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>“Regarding the infrastructure, P2.9, if there is no confirmation of design to be used, all must be scoped in. Furthermore on P2.13 (and more) this should include scoping of the seabed footprint of moorings and any levelling or scour protection, and where they will come into the decommissioning plans. In open waters the SFF, from a safety perspective would strongly oppose the use of concrete mattresses.”</i>	See Volume 1, Chapter 4: Project Description for detail on all parameters that have been included in the design envelope for the EIA, including the approach to decommissioning of marine cables.
	610	12 May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>“Table 2.3.6 on P2.15 needs to give more clarity to the export cable parameters, the number of cables is not as important as the width of the corridor they are in is the important detail, especially if not safely buried. Then on P2.21 there is nothing to say how the project will ensure the safety of fishers by checking and clearing the export cable corridor. In my considered view, on P2.22, the many projects across the North Sea that think they are going to leave buried cables in situ is totally irresponsible. The project would need to prove that the seabed involved will not be needed again to bury cables. If not we run the risk of multiple generations of cable piling on top of each other, and along with all the protective measures turning the seabed into a dystopian nightmare ecosystem which no one can use.”</i>	See Volume 1, Chapter 4: Project Description for detail on all parameters that have been included in the design envelope for the EIA, including the approach to decommissioning of marine cables.
Scottish Hydro Electric	627	12 May 2023, MD-LOT	<i>“We note that final decisions on export cable routes and landfall locations for the</i>	This comment is acknowledged.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
Transmission Plc (SHE Transmission)		Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>MarramWind project have not yet been made. As part of our responsibilities to deliver and maintain critical national transmission infrastructure within and connecting the North of Scotland, which is required to support Net Zero targets, SHE Transmission is currently developing additional transmission subsea cable projects that interact with the identified scoping boundary and survey areas for the MarramWind Offshore Wind Farm, associated export cables, and potential landfall locations. These projects include future HVDC connections between England and Scotland (including the Eastern Green Link 3 project) and a subsea HVDC connection between Spittal, in Northern Scotland, and the Peterhead area."</i>	
Salamander Offshore Wind Farm	641	12 May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"We note the Marram Wind Offshore Wind Farm project description, including the design envelope, is still in development but will be fully detailed in the Environmental Impact Assessment (EIA) Report, and will include indicative maximum project parameters, taking into account consultee feedback provided within the Scoping Opinion."</i>	Volume 1, Chapter 4: Project Description sets out the design parameters of the Project, including for various options where flexibility is required within the design envelope. The technical aspect chapters set out the maximum design scenario relevant to each assessment, taking account of the options presented in Volume 1, Chapter 4: Project Description .
MOD	678	12 September 2023, MD-LOT Scoping Opinion Addendum (Scottish	<i>"It is acknowledged that the final design of this project has not yet been determined and that an indicative design envelope has been provided. Chapter 2 of the scoping report provides a description of the project,</i>	Volume 1, Chapter 4: Project Description presents the wind turbine parameters including any infrastructure and technology optionality included within the design envelope for EIA.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		Government, 2023).	<i>stating that the project could be made of up to 225 turbines, 350m to tip height above Mean High Water Springs (MHWS)."</i>	
Salamander Offshore Wind Farm	199	3 April 2023, Aberdeenshire Council's Scoping Opinion Representation (Aberdeenshire Council, 2023).	<i>"We note the Marram Wind Offshore Wind Farm project description, including the design envelope, is still in development but will be fully detailed in the Environmental Impact Assessment (EIA) Report, and will include indicative maximum project parameters, taking into account consultee feedback provided within the Scoping Opinion."</i>	This EIA Report addresses this within Volume 1, Chapter 4: Project Description .
NatureScot	670	29 September 2022, Meeting.	<i>"NatureScot asked what the methodology is for choosing the most suitable cable connection for the windfarm array to landfall?"</i>	The optioneering process applied to the offshore export cable routing is described in Volume 1, Chapter 3: Site Selection and Consideration of Alternatives .
MD-LOT	729	21 March 2024, Meeting.	The Project stated that MarramWind will be a phased project, due to the scale of the project, and external factors such as supply chain. The intention is to submit a single 3GW EIA submission, but for the Project to be constructed in three phases. It is proposed that the EIA will have a phasing plan limit and assess the impact of developing the project in phases. MarramWind aims to refine the intended approach through further engagement with MD-LOT in the coming months. MD-LOT said if we have any specific questions on phasing to pass onto MD-LOT.	Strategic level stakeholder engagement meetings have been held with MD-LOT in October 2024 and July 2025. These meetings have set out the Applicant's intended approach to offshore consenting and sought MD-LOT's advice and guidance on these matters. Minutes from all meetings have been shared with MD-LOT.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<p>MarramWind proposes a follow-up discussion with MD-LOT and NatureScot to present the plan. MarramWind will circulate any specific questions they may have for MD-LOT and / or NatureScot in advance of this meeting.</p> <p>MD-LOT asked <i>“if the Project will assess the impacts of the whole development. MarramWind confirmed that the intention is to assess the whole project but as a phased project.”</i></p>	
MD-LOT	733	20 June 2024, Meeting.	<p>MarramWind outlined that the Project will be developed via a phased build-out, with construction likely in three phases. The size of each phase is currently under consideration, and the construction plan will be refined and presented as part of the EIA submission. MarramWind would like to involve MD-LOT and NatureScot in meetings to discuss the approach to phasing and to obtain feedback. MD-LOT requested that the Project provides some detailed information on the phasing approach first, and to outline any specific questions for MD-LOT relating to consenting for the phasing (via email).</p>	<p>Volume 1, Chapter 4: Project Description sets out the need for a phased approach and the construction scenarios for each major infrastructure component. The construction programme presented in Volume 1, Chapter 4: Project Description and provides an early indicative plan for how a phased build-out would be achieved. Information on the approach to phasing has been shared with MD-LOT at Quarterly stakeholder engagement meetings and other consultation and engagement forums throughout 2024 and 2025.</p>
Joint Radio Company (JRC)	872	1 November 2024, Email.	<p><i>“Information provided in relation to stat con 2 / maximum approximate building height of the substation. JCR to review the information and if able, provide feedback if</i></p>	<p>The Applicant shared indicative search areas for the onshore substation site with the JRC ahead of Statutory Consultation 2 in order to provide full visibility of our proposals and understand any issues from the JRC’s perspective. As well as requesting further information on the size and location of the</p>

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>the current proposals are likely to present any issues."</i>	onshore substation sites within the search areas, the JRC also asked the project to provide maximum elevation heights of substation structures to help with their assessments. At the time, maximum elevation heights of the onshore substation structures was not known to the Project, and therefore the JRC issued a holding objection until that information could be provided. After the assessment of maximum elevation heights of substation structures had been concluded, the Project issued this information to the JRC, who confirmed on 10 September 2025 that the proposal has now been cleared.

Table 1.5 Stakeholder issues responses – Approach to the EIA

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
MD-LOT	270	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“2.4.12 The Scottish Ministers acknowledge that the Developer is currently undertaking a Habitats Regulations Appraisal (“HRA”) Report in accordance with HRA Regulations. The Scottish Ministers recommend that the Developer submits an HRA screening report at the earliest opportunity and before the submission of the EIA Report. The Scottish Ministers also advise that the Developer must identify how habitats of conservation value can be avoided through micro-siting of wind farm components, inclusive of all cabling, in the EIA Report as the effects on European site integrity cannot be ruled out.”</i>	The Project’s HRA Screening Report was submitted on 15th August 2024 (MarramWind Limited, 2024). The HRA Screening responses pertaining to the EIA approach are presented in this Appendix or within the RIAA . A workshop was held on 24th June 2025 to discuss the approach to HRA with NatureScot. The HRA and EIA demonstrates the mitigation hierarchy as set out in Volume 1, Chapter 5: Approach to EIA .
	277	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“Contents of the EIA Report 3.1.1 This section provides the Scottish Ministers’ general comments on the approach and content of information to be provided in the Developer’s EIA Report, separate from the comments on the specific receptor topics discussed in section 5 of this Scoping Opinion.”</i>	This comment is acknowledged and this EIA Report follows the approach set out in the Scoping Report.
	278	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“Contents of the EIA Report 3.2.1 Matters are not scoped out unless specifically addressed and justified by the Developer and confirmed as being scoped out by the Scottish Ministers. The matters scoped out should be documented and an</i>	Each environmental aspect chapter (offshore environmental aspects in Volume 1, Chapters 6 to 18 ; onshore environmental aspects in Volume 1, Chapters 19 to 27 ; and whole-project aspects in Volume 1, Chapters 28 to 33) sets out activities or impacts scoped out of assessment and the rationale to justify the approach.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>appropriate justification noted in the EIA Report."</i>	
	279	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Contents of the EIA Report 3.3.1 The Developer has committed to several mitigation plans, including but not limited to a Fisheries Management and Mitigation Strategy, a Marine Pollution Contingency Plan, and a Marine Mammal Mitigation Protocol. Any embedded mitigation relied upon for the purposes of the assessment should be clearly and accurately explained in detail within the EIA Report. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The EIA Report must identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions."</i>	<p>Volume 1, Chapter 5: Approach to the EIA sets out the overarching consideration of embedded environmental measures and how they incorporated into the Project, each aspect chapter includes a table of all relevant embedded environmental measures and how they will be secured.</p> <p>Appendix 5.2: Commitments Register is provided alongside this EIA Report.</p> <p>The Implementation Plans submitted with this EIA Report are set out in Volume 4: Implementation Plans.</p>
	280	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Contents of the EIA Report 3.3.2 The EIA Report should clearly demonstrate how the Developer has had regard to the mitigation hierarchy, including giving consideration to the avoidance of key receptors. The Scottish Ministers advise that where the mitigation is envisaged to form part of a management or mitigation plan, the EIA Report must set out these plans or the reliance on these in sufficient detail so the significance of the residual effect can be assessed and evaluated. This should also include the identification of any monitoring</i>	<p>Volume 1, Chapter 5: Approach to the EIA sets out the overarching consideration of environmental measures and how they will be incorporated into the Project, with specific measures and monitoring where relevant set out in Volume 1, Chapters 6 to 33.</p> <p>Volume 1, Chapter 3: Site Selection and Consideration of Alternatives and Volume 1, Chapter 5: Approach to the EIA presents the Project approach to the applying the mitigation hierarchy.</p>

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>and remedial actions (if relevant) in the event that predicted residual effects differ from actual monitored outcomes. Commitment to developing plans without sufficient detail is not considered to be suitable mitigation in itself."</i>	
	281	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Contents of the EIA Report 3.3.3 The EIA Report must include a table of mitigation that corresponds with the mitigation identified and discussed within the various chapters of the EIA Report and accounts for the representations and advice attached in Appendix I."</i>	Appendix 5.2: Commitments Register is provided alongside this EIA Report. Volume 1, Chapter 5: Approach to the EIA sets out the overarching consideration of embedded environmental measures and how they will be used for the Project, each aspect chapter includes a table of all relevant embedded environmental measures that are embed into the design and how they will be secured.
	282	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Contents of the EIA Report 3.3.4 Where potential impacts on the environment have been fully investigated but found to be of little or no significance, it is sufficient to validate that part of the assessment by detailing in the EIA Report, the work that has been undertaken, the results, what impact, if any, has been identified and why it is not significant."</i>	Volume 1, Chapter 5: Approach to the EIA sets out the overarching approach to assessing and interpreting significance levels. This includes the approach to reporting on impacts of little to no significance. Use of professional judgement and any necessary variations to the approach to EIA are set out in Volume 1, Chapters 6 to 33 .
	283	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Contents of the EIA Report 3.4.1 The EIA Report must include a description and assessment of the likely significant effects deriving from the vulnerability of the Proposed Development to major accidents and disasters. The Developer should make use of appropriate</i>	Risk of major accidents and disasters has been included in this EIA Report, as set out in Volume 1: Chapter 5: Approach to the EIA, Volume 1, Chapter 14: Commercial Fisheries; Volume 1, Chapter 15: Shipping and Navigation; Volume 1, Chapter 18: Infrastructure and Other Marine Users; Volume 1, Chapter 20: Water

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>guidance, including the recent Institute of Environmental Management and Assessment (“IEMA”) ‘Major Accidents and Disasters in EIA: A Primer’, to better understand the likelihood of an occurrence and the Proposed Development susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development’s potential to cause an accident or disaster.”</i>	Resources and Flood Risk ; and Volume 1, Chapter 31: Civil and Military Aviation .
	284	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“Contents of the EIA Report 3.4.2 The Scottish Ministers advise that existing sources of risk assessment or other relevant studies should be used to establish the baseline rather than collecting survey data and note the IEMA Primer provides further advice on this. This should include the review of the identified hazards from your baseline assessment, the level of risk attributed to the identified hazards and the relevant receptors to be considered.”</i>	Hazards are identified in the baseline assessment and are set out in Volume 1, Chapter 14: Commercial Fisheries ; Volume 1, Chapter 15: Shipping and Navigation ; Volume 1, Chapter 18: Infrastructure and Other Marine Users ; Volume 1, Chapter 20: Water Resources and Flood Risk ; and Volume 1, Chapter 31: Civil and Military Aviation .
	285	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“Contents of the EIA Report 3.4.3 The assessment must detail how significance has been defined and detail the inclusions and exclusions within the assessment. Any mitigation measures that will be employed to prevent, reduce, or control significant effects should be included in the EIA Report.”</i>	Section 5.7 of Volume 1, Chapter 5: Approach to the EIA identifies the overarching approach to assessment of significance. The ‘significance evaluation methodology’ section within Volume 1, Chapter 6 to 33 provide aspect specific approaches to significance. Section 5.8 of Volume 1, Chapter 5: Approach to the EIA identifies the overarching approach to environmental measures presented in Appendix 5.2: Commitments

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
				Register sets out the commitments being made as part of the Project.
	286	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“Contents of the EIA Report 3.4.4 The Scottish Ministers acknowledge that the Scoping Report proposes that the EIA Report will not include a standalone chapter on Major Accidents and/or Disasters and rather will be considered within relevant environmental chapters, which will assess the likely risks either to/or arising from the Proposed Development in relation to potential areas of vulnerability and the associated control measures which will be employed to address these.”</i>	Risk of major accidents and / or disasters has been included in this EIA Report and is set out in Volume 1, Chapter 5: Approach to the EIA, Volume 1, Chapter 14: Commercial Fisheries; Volume 1, Chapter 15: Shipping and Navigation; Volume 1, Chapter 18: Infrastructure and Other Marine Users; Volume 1, Chapter 20: Water Resources and Flood Risk; and Volume 1, Chapter 31: Civil and Military Aviation.
	288	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>“Consultation 4.1.1 Following receipt of the Scoping Report, the Scottish Ministers, in accordance with the EIA Regulations, initiated a 30-day consultation process, which commenced on 15 February 2023, with the exception of consultation with the Scottish Hydro Electric Transmission Network which commenced on 16 February 2023. Following consultation extensions, the last response was received on 4 April 2023. The following bodies were consulted, those marked in bold provided a response and those marked in italics stated they had no comments, or a nil response was assumed: • Aberdeen City Council • Aberdeen International Airport • Aberdeenshire Council</i>	This comment is acknowledged and documented in the PAC Report .

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<ul style="list-style-type: none"> • Broadshore Offshore Windfarm (NE6) • BT • Buchan Offshore Windfarm (NE8) • CAA • Crown Estate Scotland • Dee DSFB • Don DSFB • Fisheries Management Scotland • Fisheries office - Peterhead and Fraserburgh • Food Standards Scotland • Forth DSFB • Fraserburgh Harbour Commissioners • Green Volt Offshore Wind Ltd ("Green Volt") • Historic Environment Scotland ("HES") • Inshore fishery group - North and East Coast RIFG • JNCC • Joint radio company • Marine safety forum • Maritime and Coastguard Agency ("MCA") • Ministry Of Defence ("MOD") • Moray Council • National Trust for Scotland • NATS • Natural England • NatureScot • Northern Lighthouse Board ("NLB") • NorthLink ferries • Ofgem • Oil and Gas UK • Peterhead port authority • RSPB Scotland • RYA 	

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<ul style="list-style-type: none"> • Salamander Offshore Wind Farm • Scottish Canoe Association • Scottish Creel Fishermen's Federation • Scottish Fishermen's Federation ("SFF") • Scottish Fishermen's Organisation • Scottish Surfing Federation • Scottish Water • Scottish Wildlife Trust • Scottish Environment Protection Agency ("SEPA") • Sport Scotland • Scottish Hydro Electric Power Distribution ("SHEPD") • Scottish Hydro Electric Transmission Plc ("SHE Transmission") • Surfers Against Sewage • The Highland Council • UK Chamber of Shipping ("UK CoS") • Visit Scotland • Whale and Dolphin Conservation • Highlands and Islands Airport ("HAIL"). 	
	289	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	"Consultation 4.1.2 Specific advice was sought from Marine Scotland Science ("MSS"), Ports and Harbours (Transport Scotland), Transport Scotland, Planning (Scotland), and the Marine Scotland – Marine Analytical Unit ("MAU")."	This comment is acknowledged.
	290	12 May 2023, MD-LOT Scoping Opinion	"Consultation 4.2.1 From the list above a total of 24 responses were received. Advice was also provided by Transport Scotland, MSS, and	This comment is acknowledged.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		(Scottish Government, 2023).	<i>MAU. The purpose of the consultation was to seek representations to aid the Scottish Ministers' consideration of which potential effects should be scoped in or out of the EIA Report."</i>	
	291	MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Consultation 4.2.2 The Scottish Ministers are satisfied that the requirements for consultation have been met in accordance with the EIA Regulations. The sections below highlight issues that are of particular importance with regard to the EIA Report and any marine licence applications. The representations and advice received are attached in Appendix I and each must be read in full for detailed requirements from individual consultees."</i>	Volume 1, Chapter 5: Approach to the EIA sets out the consultation and engagement (Section 5.4 and Section 5.5) undertaken for this EIA Report. Representations and advice received in "Appendix I" is address in this Appendix and the environmental aspect chapters (Volume 1, Chapters 6 to 33).
	292	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"5.1.1 This section contains the Scottish Ministers' opinion on whether the impacts identified in the Scoping Report are scoped in or out of the EIA Report. The Scottish Ministers advise that the representations from consultees and advice from MAU, Transport Scotland, Ports and Harbours (Transport Scotland), and MSS must be considered in conjunction with the Scoping Opinion and with the expectation that recommendations and advice as directed through this Scoping Opinion are implemented."</i>	Volume 1, Chapter 5: Approach to the EIA sets out the consultation and engagement (Section 5.4 and Section 5.5) undertaken for this EIA Report. Representations and advice received in 'Appendix I' is address in this Appendix and the environmental aspect chapters (Volume 1, Chapters 6 to 33).
	393	12 May 2023, MD-LOT Scoping	<i>"6.1.3 The Scottish Ministers strongly advise the production of a HRA screening report for the Proposed Development and recommend</i>	The HRA Screening Report was submitted to MD-LOT on 15 August 2024 (MarramWind Limited, 2024).

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		Opinion (Scottish Government, 2023).	<i>that this should be submitted for comment at the earliest opportunity and in advance of the submission of the EIA."</i>	
	394	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"6.1.4 A gap analysis template is attached at Appendix II to record the environmental concerns identified during the scoping process. This template should be completed and used to inform the preparation of the EIA Report. As part of the submission of the EIA Report the Scottish Ministers advise that the Developer must provide confirmation of how this Scoping Opinion is reflected in the EIA Report."</i>	The MD-LOT Gap Analysis has been completed and is provided as part of the Application.
	395	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Multi-Stage Consent and Regulatory Approval 7.1.1 The EIA Regulations contain provisions regulating the assessment of environmental impacts. A multi-stage consent or regulatory approval process arises where an approval procedure comprises more than one stage; one stage involving a principal decision and one or more other stages involving implementing decision(s) within the parameters set by the principal decision. While the effects which works may have on the environment must be identified and assessed at the time of the procedure relating to the principal decision, if those effects are not identified or identifiable at the time of the principal decision, assessment</i>	The Project acknowledges the comment and recognises the requirements of the EIA Regulations in relation to multi-stage consent processes.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>must be undertaken at the subsequent stage."</i>	
	396	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Multi-Stage Consent and Regulatory Approval 7.1.2 The definition in the 2017 EW Regulations is as follows (the definition in the 2017 MW Regulations provides for the same but in relation to "regulatory approvals"): "application for multi-stage consent" means an application for approval, consent or agreement required by a condition included in a regulatory approval where (in terms of the condition) that approval, consent or agreement must be obtained from the Scottish Ministers before all or part of the development permitted by the Electricity Act consent may be begun".</i>	The Applicant acknowledges the definition of " <i>application for multi-stage consent</i> " as set out in the 2017 Electricity Works (Environmental Impact Assessment) (Scotland) Regulations and notes the equivalent provision in the 2017 Marine Works Regulations. The Applicant is aware that any approvals, consents or agreements required by condition - such as those to be submitted at the AMSC or post-consent stage - must be obtained prior to commencement of the relevant works, and will ensure that all such applications are prepared and submitted in accordance with the relevant regulatory framework.
	397	12 May 2023, MD-LOT Scoping Opinion (Scottish Government, 2023).	<i>"Multi-Stage Consent and Regulatory Approval 7.1.3 A s.36 consent or marine licences, if granted, by the Scottish Ministers for the Proposed Development, may have several conditions attached requiring approvals etc. which fall under this definition, for example the approval of a CMS. When making an application for multi-stage consent or regulatory approval the Developer must satisfy the Scottish Ministers that no significant effects have been identified in addition to those already assessed in the EIA Report."</i>	The Applicant acknowledges the comment and confirms that it is anticipated that any s.36 consent or marine licences granted for the Project will include conditions requiring further approvals. Where necessary, further environmental information will be provided to support applications, in accordance with the EIA Regulations.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
The Highland Council	424	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<p><i>"Thank you for consulting the Highland Council on the above scoping report. This was registered on 15 February 2023. We have reviewed the accompanying information and have no scoping advice to provide in response to the information contained within the report. This is on the basis that due to the location and the details contained within the scoping document the development appears to hold limited relevance to the Highland Council's area.</i></p> <p><i>The Highland Council does not deem it necessary to be consulted in subsequent phases of the development's route to consent. This position may be revised should any elements of the development subsequently evolve to include or impact upon the Highland Council area, for example through operation and maintenance plans."</i></p>	This comment is acknowledged.
Joint Nature Conservation Committee (JNCC)	425	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<p><i>"Thank you for consulting JNCC on the MarramWind Offshore Windfarm Scoping Consultation which we received on 15/02/2023.</i></p> <p><i>NatureScot is now authorised to exercise the JNCC's functions as a statutory consultee in respect of certain applications for offshore and offshore waters (0-200nm) adjacent to Scotland.</i></p> <p><i>Therefore, NatureScot should provide a full response. However, we will check with</i></p>	This comment is acknowledged.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>NatureScot if they require any input from JNCC on this consultation and provide feedback directly to NatureScot where this is required."</i>	
Natural England	437	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<p><i>"Thank you for your consultation which we received 20th February 2022 consulting Natural England on the MarramWind Environmental Impact Assessment (EIA) Scoping Report. The following constitutes Natural England's formal statutory response. This is without prejudice to any comments we may wish to make in light of further submissions or on the presentation of additional information.</i></p> <p><i>The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). We have delegated responsibility from JNCC to also advise on offshore wind farms in all English waters out to 200 nautical miles or the median line. As the application is located outside English waters, advice from NatureScot and JNCC, the statutory nature conservation bodies for Scottish waters, should be sought. The response in this letter is based on the consultation documents received:</i></p> <p><i>Environmental Impact Assessment – Scoping Report. MarramWind Offshore Wind Farm, January 2023 plus accompanying figures."</i></p>	This comment is acknowledged.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
	438	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Due to our remit, we have limited our advice to chapters 5.6 (marine mammals), 5.7 (ornithology) and 5.8 (fish ecology). Within these bounds we have also restricted our advice to species from English Marine Protected Areas and to species in English waters. We defer to NatureScot and JNCC for advice on Scottish matters. Should the proposal be amended in a way which significantly affects its impact on the English natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again."</i>	This comment is acknowledged. Please see Volume 1, Chapter 11: Marine Mammals ; Volume 1, Chapter 12: Offshore and Intertidal Ornithology ; and Volume 1, Chapter 13: Fish Ecology for responses.
NatureScot	443	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Content of the Scoping Report We are generally content with the Scoping Report, which is well laid out, easy to navigate and read."</i>	This comment is acknowledged.
	444	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Assessment approach The EIA Report should consider the impact of all phases of the proposed development on the receiving environment, including effects from pre-construction activities as well as the construction, operation and maintenance and decommissioning phases. We recommend that the following aspects are considered further and included in the EIA Report."</i>	This EIA Report considers all stages of the Project, including pre-construction, construction, O&M and decommissioning activities, see Volume 1, Chapter 4: Project Description for further details and the technical aspect chapters (Volume 1, Chapters 6 to 33).

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
	449	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Habitats Regulations Appraisal (HRA) Our preference is for an HRA screening report to be submitted at the same time as the EIA scoping report. The HRA screening report should identify sites for which there may be a likely significant effect (LSE). We request that such a report is produced and submitted for comment at the earliest opportunity, in order to fully inform our HRA advice for this project."</i>	The Habitats Regulations Assessment Screening Report was submitted to MD-LOT on 15 August 2024 (MarramWind Limited, 2024). The RIAA is provided alongside this EIA Report as a separate document.
	450	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<p><i>"Natural Heritage interests to be considered We provide advice as detailed below within receptor-specific and impact-pathway specific technical appendices for key natural heritage interests to be considered in the EIA Report and HRA:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>Advice on ornithological interests is provided in Appendix A.</i> <input type="checkbox"/> <i>Advice on marine mammal interests is provided in Appendix B.</i> <input type="checkbox"/> <i>Advice on seascape, landscape and visual impact assessment (SLVIA) is provided in Appendix C.</i> <input type="checkbox"/> <i>Advice on benthic, epibenthic and intertidal interests is provided in Appendix D.</i> <input type="checkbox"/> <i>Advice on fish and shellfish interests is provided in Appendix E.</i> <input type="checkbox"/> <i>Advice on marine and coastal processes is provided in Appendix F.</i> <input type="checkbox"/> <i>Advice on underwater noise is provided in Appendix G."</i> 	This comment is acknowledged. Please see Volume 1, Chapter 6: Marine Geology Oceanography and Physical Processes; Volume 1, Chapter 8: Underwater Noise; Volume 1, Chapter 10: Benthic, Epibenthic and Intertidal Ecology; Volume 1, Chapter 11: Marine Mammals; Volume 1, Chapter 12: Offshore and Intertidal Ornithology; Volume 1, Chapter 13: Fish Ecology; and Volume 1, Chapter 17: Seascape, Landscape and Visual for responses.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
	452	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Mitigation We welcome the embedded environmental measures described each of the relevant sections of the Scoping Report (for example Table 5.1.5). We advise that the full range of mitigation and monitoring measures, and published guidance, are considered and discussed in the EIA Report."</i>	<p>Volume 1, Chapter 5: Approach to the EIA sets out the overarching consideration of embedded environmental measures and how they will be used for the Project, each aspect chapter (Volume 1, Chapters 6 to 31) includes a table of all relevant embedded environmental measures that are embed into the design and how they will be secured.</p> <p>Appendix 5.2: Commitments Register is provided alongside this EIA Report.</p> <p>Technical guidance used within this EIA Report is provided in Section 2.6 in Volume 1, Chapter 2: Legislative and Policy Context, and specific technical guidance to specific aspects is provided in the technical aspect chapters (Volume 1, Chapters 6 to 33).</p>
	453	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"We note there are some aspects of the scoping report where there is ambiguity and or lack of certainty on some of the impact assessment tools and techniques that will be deployed. This may be due to the novel nature of floating wind particularly at this distance and in these depths of waters. We will engage with MarramWind Offshore Wind Farm Limited and have sought to identify within each Appendix where there is the need for further discussion to refine and agree assessment methods."</i>	The Project has held continued engagement with NatureScot via Quarterly meetings with MD-LOT and NatureScot during the pre-application stage.
	454	12, May 2023, MD-LOT Scoping Opinion Appendix 1	<i>"Further information and advice We hope this advice is of assistance to help inform the scoping opinion, noting that there may be aspects where limited further engagement is required to assist in</i>	The Project has held continued engagement with NatureScot via Quarterly meetings with MD-LOT and NatureScot during the pre-application stage.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		(Scottish Government, 2023).	<i>undertaking the EIA Report. Please contact me in the first instance for any further advice, using the contact details below, copying to our marine energy mailbox – marineenergy@nature.scot."</i>	
Scottish Water	553	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Audit of Proposal Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced. Please read the following carefully as there may be further action required."</i>	This comment is acknowledged.
SEPA	565	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Thank you for the above consultation. Based on the information provided, it appears that this application falls below the thresholds for which SEPA provide site specific advice. Please refer to our standing advice and other guidance which is available on our website. In addition, please also refer to our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations available her."</i>	This comment is acknowledged.
	566	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish	<i>"If there is a significant site-specific issues, not addressed by our guidance or other information provided on our website, with which you would want our advice, then please reconsult us highlighting the issue in question and we will try our best to assist."</i>	This comment is acknowledged. The Applicant has consulted with SEPA throughout the Project.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		Government, 2023).		
Transport Scotland	567	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"We understand that the proposed development comprises a floating offshore wind farm in the region of 126 to 225 wind turbines located approximately 75-110km offshore from the north-east Aberdeenshire coast. The Offshore Wind Farm will have a total grid connection capacity of up to 3GW. We note that the Project will also include onshore transmission infrastructure to facilitate connection of the MarramWind Offshore Wind Farm to the National Electricity Transmission System (NETS), and as such, the SR covers both onshore and offshore aspects."</i>	This EIA Report covers both offshore and onshore elements of the Project (offshore environmental aspects in Volume 1, Chapters 6 to 18 ; onshore environmental aspects in Volume 1, Chapters 19 to 27 ; and whole-project aspects in Volume 1, Chapters 28 to 33).
SFF	604	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Before addressing the details of the paper, I would like to note that having both Onshore and Offshore in one paper was time-consuming, and was not helped by the page numbering system which was not conducive to moving about the paper with ease. However herein is our detailed response."</i>	This EIA Report covers both offshore and onshore elements of the Project (offshore environmental aspects in Volume 1, Chapters 6 to 18 ; onshore environmental aspects in Volume 1, Chapters 19 to 27 ; and whole-project aspects in Volume 1, Chapters 28 to 33). The Scoping Report and EIA Report are presented for the whole Project to ensure a holistic approach to EIA reporting and environmental management. Given the size of the EIA Report and wider application documents, the chapters are available as stand-alone documents.
	612	12, May 2023, MD-LOT Scoping Opinion Appendix 1	<i>"Considering the many subsidiary plans required, para 3.7.15, table 3.8.1; P5.16 table 5.1.5; P5.4.9, table 5.4.5; P5.5.31 table 5.5.11; P5.6.22, table 5.6.10; P5.8.32, table 5.8.15; P5.5.32, table 5.5.11; P5.9.18,</i>	All Implementation Plans are provided in Volume 4 . Most of these Implementation Plans are outline, but the Project has committed to submitting Full Implementation Plans post-consent as stated in Appendix 5.2: Commitments Register .

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		(Scottish Government, 2023).	<i>table 5.9.8 there is a need for clarity on the best time for these to be produced, and for the SFF the best case is getting them approved pre-consent. Post consent is too late.</i>	
	613	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"P4.3, para 4.1.1, should note that previous relationships are only part of the story, this new industry must reach further in order to properly assess such as export cable corridors."</i>	The Project has had ongoing engagement with SFF and other commercial fisheries stakeholders throughout the Pre-Application stage (see PAC Report). See Volume 1, Chapter 4: Project Description for detail on the design parameters included in the design envelope for EIA, including in relation to export cable corridors.
	614	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"The design evolution process described on P 4.6 if genuinely adhered to will be a welcome advance. In this process the project must be mindful of the simple fact that fishers do not work 9-5, and their time ashore can be valuable, so FLO appearing at all times of day or night is not the way to gain trust."</i>	The Project has had ongoing engagement with SFF and other commercial fisheries stakeholders throughout the Pre-Application stage (see PAC Report). The Project has been proactive in arranging dedicated meetings with commercial fisheries representatives in Peterhead and Aberdeen and via online calls.
	615	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Further on, P4.14, para 4.2.38 refers to "professional" judgement on matters of value in the EIA, but the SFF would contend that comparing the fishing industry with the renewables industry is an impossible task, apples and oranges."</i>	Professional judgement is used to determine what is conservative, noting that the purpose of EIA is to identify effects that are both significant and likely.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
SHE Transmission	624	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>“Scottish Hydro Electric Transmission Plc (SHE Transmission) welcomes the inclusion of the Eastern Green Link 2 project in the MarramWind offshore windfarm Scoping Report, and confirm that the EGL2 Marine Licence Application was submitted to MS-LOT in July 2022 under application number 00009943.”</i>	This comment is acknowledged.
	628	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>“SHE Transmission request that present and future cables, both power and telecoms, are given due consideration and that the provision is maintained for cables to cross both export cables and the generation site, and that the freedom of the seas is maintained. SHE Transmission remains committed to working with other legitimate users of the sea in a proactive manner, enabling all parties to deliver successful projects wherever reasonably possible. We suggest that ongoing discussion and consultation between both parties is maintained, and where necessary that proximity and crossing agreements are developed.”</i>	This comment is acknowledged.
Aberdeenshire Council	629	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>“With regards the offshore aspect of the proposed development, Aberdeenshire Council are generally only concerned with potential effects upon the intertidal zone between mean high-water springs and mean low water springs. As such, our comments on the offshore development will be limited, with Marine Scotland being best placed to</i>	This comment is acknowledged.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>consider whether the offshore elements of the scoping report are acceptable and if the proposals can be adequately managed with low risk to the marine environment. The main potential impacts relate to ecology and archaeology."</i>	
Aberdeenshire Council	634	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"It is noted within the scoping report that the intertidal zone will be considered throughout all aspects of the environmental assessment subject to the matters which are noted for scoping out. This approach is welcomed, and the Planning Service has no objection to any of the matters noted for scoping out."</i>	This comment is acknowledged. This EIA Report has followed the approach set out in the Scoping Report.
Aberdeenshire Council	635	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"In conclusion, having assessed the offshore section of the Scoping Report and having received comment from the abovementioned consultees, who will also be formally consulted on the EIA, the Planning Service is content with the approach taken and the scope of the assessment, the environmental issues identified, and the methodology proposed."</i>	This comment is acknowledged. This EIA Report has followed the approach set out in the Scoping Report.
Food Standard's Scotland	636	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"I refer to the above application for a Marine Licence under the MARINE (SCOTLAND) ACT 2010. In our role as a consultee, Food Standards Scotland's assessment of the application is limited to potential risks to the safety of the human food chain that could result from the environmental impact of emissions from the installation to the</i>	Volume 1, Chapter 5: Approach to the EIA sets out the overarching consideration of embedded environmental measures and how they will be used for the Project, each aspect chapter (Volume 1, Chapters 6 to 33) includes a table of all relevant embedded environmental measures that are embed into the design and how they will be secured.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>surrounding area. FSS notes that there is no food product production being proposed at this time but it is the responsibility of the operator to ensure that any product destined for the human food chain from the operation meets with the requirements of the Food Safety Act 1990. Furthermore, it is the responsibility of the operator to comply with environmental legislation to mitigate the impact on species/fisheries products present. FSS notes that the relevant Marine Scotland Guidance and all other relevant Guidance Notes and Regulations should be followed in order to mitigate any unacceptable effects on the human food chain from the emissions from this installation."</i>	Appendix 5.2: Commitments Register is provided alongside this EIA Report.
Salamander Offshore Wind Farm	643	12, May 2023, MD-LOT Scoping Opinion Appendix 1 (Scottish Government, 2023).	<i>"Salamander Offshore Wind Farm is working with Marram Wind through the Peterhead Developers Forum, including regarding offshore survey planning to minimise disruption to other sea users and wishes to engage in any discussions and be kept informed of your proposals so that the two projects may consider each other cumulatively through the development process"</i>	Bi-lateral meetings have been held with Salamander Offshore Wind Farm to discuss potential interfaces between the two respective projects.
MOD	676	12 September 2023, MD-LOT Scoping Opinion Addendum (Scottish	<i>"Thank you for consulting the Ministry of Defence (MOD) in advance of an application for the construction and operation of the MarramWind Offshore Wind Farm. Consultation correspondence was received by this office on 15 February 2023."</i>	This comment is acknowledged.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		Government, 2023).		
Aberdeenshire Council	24	22 March 2023, Aberdeenshire Council's Scoping Opinion (2023).	<i>"Environmental issues are of obvious key importance such as those aspects of the environment that would be likely to be significantly affected."</i>	Details of the likely significant effects are detailed in the technical aspect chapters (Volume 1, Chapters 6 to 33).
	26	22 March 2023, Aberdeenshire Council's Scoping Opinion (2023).	<i>"Following analysis of the aspects of the environment which would be likely to be significantly affected, a detailed assessment of the effects themselves would be required along with mitigation measures proposed."</i>	Volume 1, Chapter 5: Approach to the EIA sets out the overarching methodology for the assessment of likely significant effects. Detailed assessment of effects and proposed mitigation measures, where necessary, is set out in Volume 1, Chapters 6 to 33 .
	27	22 March 2023, Aberdeenshire Council's Scoping Opinion (2023).	<i>"Examples of the types of issues that should be addressed include:</i> <ul style="list-style-type: none"> • <i>Climate change</i> • <i>Local Economic Effect</i> • <i>Landscape Resource</i> • <i>Soils and geology</i> • <i>Visual Amenity</i> • <i>Ornithology</i> • <i>Visual Amenity</i> • <i>Ecology</i> • <i>Nature Conservation</i> • <i>European Protected Species</i> • <i>Hydrology and Water Supplies</i> • <i>Forestry and Tree Felling</i> <i>"</i>	This EIA Report addresses environmental issues within Volume 1, Chapter 5: Approach to the EIA and Volume 1, Chapters 19 to 33 .

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<ul style="list-style-type: none"> • <i>Transport and Traffic including road safety issues and impact on local road network during and after construction work</i> • <i>Noise</i> • <i>Cultural Heritage and archaeology</i> • <i>Land Use</i> • <i>Land Ownership</i> • <i>Tourism and Recreation, including footpaths</i> • <i>Proposed mitigation measures</i> <p><i>Please note that the above list is by no means exhaustive and that other issues might become obvious following public consultations and consultations with statutory consultees."</i></p>	
	29	22 March 2023, Aberdeenshire Council's Scoping Opinion (2023).	<i>"The comments provided within this scoping opinion relate to the onshore aspects and those affecting the whole project only. Offshore aspects will be covered in a separate response provided to Marine Scotland directly."</i>	This comment is acknowledged.
	34	22 March 2023, Aberdeenshire Council's Scoping Opinion (2023).	<i>"Approach to the EIA The Council has no comments to make regarding this section of the scoping report. All information seems reasonable."</i>	Noted. The relevant information is outlined in Volume 1, Chapter 5: Approach to the EIA , which follows the methodology established in the Scoping Report.
	115	22 March 2023, Aberdeenshire	<i>"The Planning Service acknowledges that in some instances, consultee input has been limited due to the extent of the scoping area."</i>	This comment is acknowledged and consultation with the respective consultees has been undertaken. Further detail on stakeholder engagement can be found in Volume 1,

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		Council's Scoping Opinion (2023).	<i>The Planning Service would strongly recommend further engagement with consultees as the area reduces and a more exact site location can be provided. Contact details for consultees can be provided on request."</i>	Chapter 5 Approach to the EIA and also within the respective technical aspect chapters – Volume 1, Chapters 6 to 33 .
	116	22 March 2023, Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023).	<i>"All consultee comments will be forwarded under separate cover for your reference."</i>	This comment is acknowledged.
	117	22 March 2023, Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023).	<i>"I hope the above information is of assistance as a formal scoping opinion in respect of the relevant EIA Report. Obviously during the processing of any associated planning application other issues may become obvious following public consultation and consultations with statutory consultees."</i>	This comment is acknowledged.
	118	22 March 2023, Aberdeenshire Council's Scoping Opinion (Aberdeenshire Council, 2023).	<i>"This opinion will be held for public inspection for a two year period, or until a planning application is submitted at which time the opinion will be transferred to the planning register with the application."</i>	This comment is acknowledged.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
SEPA	141	22 March 2023, Aberdeenshire Council's Scoping Opinion Representation (Aberdeenshire Council, 2023).	<i>"SEPA's remit does not cover offshore elements of the wind farm and therefore our response below is solely in relation to land based elements of the development."</i>	This comment is acknowledged.
	142	22 March 2023, Aberdeenshire Council's Scoping Opinion Representation (Aberdeenshire Council, 2023).	<i>"We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To avoid delay and potential objection, the information outlined below must be submitted in support of the application. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site."</i>	This comment is acknowledged.
	144	22 March 2023, Aberdeenshire Council's Scoping Opinion Representation (Aberdeenshire Council, 2023).	<i>"Detailed scoping requirements If there is a delay between scoping and the submission of the application, then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed. We welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each."</i>	This comment is acknowledged.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
	167	22 March 2023, Aberdeenshire Council's Scoping Opinion Representation (Aberdeenshire Council, 2023).	<i>"Other planning matters: For all other planning matters, please see our triage framework and standing advice which are available on our website: www.sepa.org.uk/environment/land/planning/.</i>	This comment is acknowledged.
MOD	202	22 March 2023, Aberdeenshire Council's Scoping Opinion Representation (Aberdeenshire Council, 2023).	<i>"Thank you for consulting the Ministry of Defence (MOD) on the above development, consultation correspondence was received by this office on 15 February 2023. This letter is in response to the onshore aspect of the proposed Offshore Windfarm only. The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System."</i>	Volume 1, Chapter 31: Civil and Military Aviation assesses impacts to aviation-related assets and receptors, including those specified by MOD in its Scoping response.
Aberdeenshire Council	209	26 April 2023, Aberdeenshire Council's Scoping Opinion Addendum	<i>"I refer to your request for a scoping opinion for the above proposal received on 30 January 2023. As stated in my previous scoping response dated 22 March 2023, I was awaiting the response from the MOD. This has now been received, the contents of which are discussed below."</i>	This comment is acknowledged.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		(Aberdeenshire Council, 2023).		
Aberdeenshire Council	217	26 April 2023, Aberdeenshire Council's Scoping Opinion Addendum (Aberdeenshire Council, 2023).	<i>"I hope the above information is of assistance as a formal scoping opinion in respect of the relevant EIA Report. Obviously during the processing of any associated planning application other issues may become obvious following public consultation and consultations with statutory consultees."</i>	This comment is acknowledged.
NatureScot	669	29 July 2022, Meeting.	<i>"NatureScot asked if each technical chapter of the report could contain the worst-case scenario?"</i>	A maximum design scenario for impacts is included in every technical aspect chapter (see Volume 1, Chapters 6 to 31).
MD-LOT	694	20 July 2022, Meeting.	<i>"The Project asked about the formal Gate-check that used to be a requirement. MD-LOT clarified that a Gap Analysis form now forms part of the Scoping Opinion, which logs consultation responses and issues raised in the Scoping Opinion for some projects but this is not a standardised or required approach. MD-LOT confirmed that it is advisable to follow this approach and to submit the EIA with this form."</i>	MD-LOT Gap Analysis has been submitted as part of the application.
Aberdeenshire Council	701	1 August 2023, Meeting.	<i>"The Project recognised that due to multiple grid projects in Peterhead, cumulative effects are likely to evolve after submission, resulting in potential need for limited (carefully scoped) further Environmental Information reports at AMSC stage, even if the Project remains within approved planning application in</i>	The Project acknowledges the comment and recognises that, once PPIp is granted, it confirms the principle and acceptability of the specified infrastructure and associated parameters.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>principle (PPiP) parameters as intended. The Project acknowledged that once PPiP is granted, this will establish the principle and acceptability of specified infrastructure and all approved parameters which should not be reopened at AMSC stage. Aberdeenshire Council noted this."</i>	
	702	1 August 2023, Meeting.	<i>"The Project queried the validity of the EIA scoping opinion, it is the Applicant's view that the EIA Scoping Opinion remains valid (in light of progressing a planning application in principle approach) as everything covered in the scoping opinion will still be assessed, it is just the level of detail within the application that will vary. Aberdeenshire Council (ET) confirmed this approach."</i>	The Applicant acknowledges the comment regarding the validity of the EIA Scoping Opinion and thanks Aberdeenshire Council's Environment Team for confirming that the Scoping Opinion remains valid in the context of progressing a Planning Application in Principle. All topics identified within the Scoping Opinion will continue to be assessed, with the level of detail tailored to the nature of the application.
	703	1 August 2023, Meeting.	<i>"Main implications relate to setting the level of both specificity and flexibility required, AMSCs, post consent implementation/management plans, land acquisition requirements and fees. The JV were starting to give thought to the management and implementation plans which would be delivered through the AMSCs, alongside what would be expected to be include at design freeze or to form part of the AMSC."</i>	The Applicant acknowledges the comment and recognises the importance of balancing specificity and flexibility across the PPiP and AMSC stages. The team have actively considered the structure and content of management and implementation plans to be delivered through the AMSCs, including what may be fixed at design freeze and what may be addressed post-consent. The implications for land acquisition and associated fees are also noted.
	704	1 August 2023, Meeting.	<i>"JV and Aberdeenshire Council discussed potential of setting up a Pre-Application Planning Performance Agreement (PPA) to optimise the planning application and help</i>	The Applicant acknowledges the comment and recognises the value of PPAs in supporting collaborative and transparent planning processes. Following initial discussions with Aberdeenshire Council and a formal pre-application advice

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<i>co-ordinate MarramWind with other development projects in Peterhead area. Aberdeenshire Council recommended PPA to add clarity.</i>	<p>request submitted in August 2024, a draft PPA was prepared and shared with the Council in October 2024.</p> <p>However, Aberdeenshire Council subsequently advised that they would not be in a position to enter into a formal PPA prior to submission of the planning application. In response, the Applicant and the Council have agreed to an alternative engagement arrangement, consisting of recurring six-weekly meetings with the assigned case officer and relevant technical specialists. These meetings provide a structured forum for ongoing engagement, updates, and discussion of key planning matters.</p> <p>This approach ensures continued coordination and transparency throughout the pre-application and application stages. The Applicant remains committed to maintaining this regular dialogue and will continue to work closely with Aberdeenshire Council to support a smooth and informed determination process.</p>
MD-LOT	735	20 June 2024, Meeting.	<i>“MarramWind requested support from MD-LOT in contacting the Ministry of Defence (MOD). MD-LOT expressed that they can facilitate this request and asked for MarramWind to send over any correspondence / emails that have been sent to the MOD.”</i>	The Project successfully made contact with MOD for post-Scoping stakeholder engagement in 2024.
MD-LOT	857	19 September 2024, Meeting.	<i>The Project explained that it is of preference to use its own Stakeholder Issues Tracker (SIT) for documenting how stakeholder issues have been addressed in the EIA, rather than using the MD-LOT Gap Analysis Spreadsheet. MD-LOT confirmed that MD-</i>	The MD-LOT Gap Analysis has been completed and is provided as part of the offshore application documents.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<p><i>LOT would prefer for the Project to use the MD-LOT Gap Analysis Spreadsheet, as this feeds into MD-LOT systems and aids consultees. However, the Project can also submit the SIT alongside this.</i></p> <p><i>The Project asked if there had been any updates or revisions to the spreadsheet since issued at Scoping, and could additional columns be added to reflect additional information. MD-LOT asked that the Project does not edit the structure of the MD-LOT tracker and puts additional information into a separate tracker if necessary. MD-LOT confirmed that the MD-LOT spreadsheet has not changed since it was issued with the Scoping Opinion. MD-LOT advised to always download trackers from the MD-LOT website as sometimes there are updates."</i></p>	
	858	19 September 2024, Meeting.	<p><i>"Certain mitigation and monitoring plans to be submitted with applications for offshore renewable projects (generating stations and transmission)</i></p> <ul style="list-style-type: none"> <i>•The purpose of this is to reduce timescales relating to approval of plans post-consent, ensure that MD-LOT has the information required to make a determination on an application and ensure that stakeholders are sufficiently informed to make representations</i> <i>•From the 1st April 2025 the following plans should be submitted with section 36 consent and marine licence applications for</i> 	The Implementation Plans submitted with this EIA Report are set out in Volume 4: Implementation Plans .

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
			<p><i>generating stations and transmission infrastructure:</i></p> <ul style="list-style-type: none"> <i>o Fisheries Mitigation, Monitoring and Communication</i> <i>o Written Scheme of Investigation and Protocol for Archaeological Discoveries</i> <i>o Marine Pollution Contingency Plan for offshore renewable energy</i> <i>o Invasive Non Native Species Mitigation</i> <p><i>•To support implementation of this our guidance will be updated to provide further information on the plans required, this is expected to be published in October 2024.</i></p> <p><i>•Some guidance has already been updated and can be found on Marine environment: licensing and consenting requirements - gov.scot (www.gov.scot)"</i></p>	
Aberdeenshire Council	885	19 December 2024, Aberdeenshire Council Pre-Application Advice Report (Aberdeenshire Council, 2024).	<p><i>"Construction Impacts Planning Service</i></p> <p><i>A Construction Environmental Management Plan will be required to demonstrate how such matters will be addressed, including the site specific controls and how these will be implemented in practice."</i></p>	The Applicant has submitted Volume 4: Outline Construction Environmental Plan.
	901	19 December 2024, Aberdeenshire Council Pre-Application Advice Report	<p><i>"EIA Submission</i></p> <p><i>Prior to the submission of an application to be accompanied by an Environmental Impact Assessment Report (EIA Report), the case officer should discuss and agree the following with the agent:</i></p>	The number of physical copies of the EIA Report and where they are to be submitted / deposited was agreed with Aberdeenshire Council at meetings on the 28 August 2025 and 9 October 2025. The Applicant will provide Aberdeenshire Council with the cost of an EIA Report should a member of the public wish to obtain their own copy and contact details which can be used to obtain their own copy.

Stakeholder	Stakeholder issues ID	Date, document, forum	Stakeholder comments	How is this address in the EIA Report
		(Aberdeenshire Council, 2024).	<p>1. The number of physical copies of the EIA Report to be provided, as a minimum:</p> <ul style="list-style-type: none"> o One copy to be provided where the planning register can be inspected. o At least one copy to be stored in a publicly accessible building in close proximity to the application site (this may require more than one location depending on scale and nature of development). o One copy for the personal use of the case officer. <p>2. The location(s) where physical copies of the EIA Report are to be sent for the public to view.</p> <p>3. The cost of an EIA Report should a member of the public wish to obtain their own copy and contact details which can be used to obtain their own copy.</p> <p>Confirmation of points 2 (including opening times of agreed public places) and 3 should be sent via email to planningadmin@aberdeenshire.gov.uk as soon as possible with a subject of:</p> <p>EIA Advert Information for Development X - Developer Y"</p>	

2. References

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The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. (SI 2017 101). [online] Available at: <https://www.legislation.gov.uk/ssi/2017/101/contents/made> [Accessed: 24 October 2025].

The Marine Works (Environmental Impact Assessment) Regulations 2007. (SI 2007 1518). [online] Available at: <https://www.legislation.gov.uk/uksi/2007/1518/contents/made> [Accessed: 24 October 2025].

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3. Glossary of Terms and Abbreviations

3.1 Abbreviations

Acronym	Definition
AMSC	Approval of Matters Specified in Conditions
EIA	Environmental Impact Assessment
HRA	Habitats Regulations Appraisal
INTOG	Innovation and Targeted Oil and Gas
JRC	Joint Radio Company
LDP	Local Development Plan
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate – Licensing Operations Team
MOD	Ministry of Defence
NPF4	National Planning Framework 4
PAC	Pre-Application Consultation
PPA	Planning Processing Agreement
PPiP	Planning Permission in Principle
RIAA	Report to Inform Appropriate Assessment
s.36	Section 36
SEPA	Scottish Environment Protection Agency
SFF	Scottish Fishermen’s Federation
SHE Transmission	Scottish Hydro Electric Transmission Plc
UXO	Unexploded Ordnance
WTG	Wind Turbine Generator

3.2 Glossary of terms

Term	Definition
Aberdeenshire Council	One of 32 divisions of Scotland, designated as a Council area for the purposes of local government, covering Aberdeenshire.

Term	Definition
EIA Regulations	<p>Terminology used in this EIA Report to refer to four sets of regulations:</p> <ul style="list-style-type: none"> • The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017; • The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017; • The Marine Works (Environmental Impact Assessment) Regulations 2007; and • The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.
EIA Report	The written output presenting the full findings of the EIA.
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').
Marine Directive – Licensing Operations Teams	Formerly known as Marine Scotland – Licensing Operations Team, MD-LOT is 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.
Planning Permission in Principle	PPiP establishes the acceptability of a type of development or land use on a site without requiring a significant level of detail about the design and implementation of a development proposal. This approach is typically used for major development proposals to avoid the initial high costs of detailed design work and to retain design flexibility. A PPiP application only seeks initial consent for, as a minimum, a proposed land use and associated suite of high-level development parameters (including access from a public road) within a defined site boundary. All detailed design and implementation matters would be deferred to subsequent applications for Approval of Matters Specified in Conditions (AMSC).
Pre-Application Consultation Report	A document required to be submitted at the submission stage that presents how pre-application consultation and stakeholder engagement was delivered in line with statutory minimum requirements or any additional requirements set out by the consenting body in their response to the Proposal of Application Notice.

Appendix A Scoping Validity

As documented in **Table 1.1**, several Scoping Opinion responses from MD-LOT related to the continued validity of the Scoping Opinion received in 2023. These are stakeholder issue IDs 249, 250, 274, 297b, 727, and 730.

This **Appendix A** responds directly to MD-LOT's queries, by providing the Applicant's justification for how the content of the Scoping Opinion remains valid despite the design evolution that has occurred since the Scoping Opinion was received.

The Applicant has undertaken a review of the project description presented at Scoping against the project description presented in the EIA Report. The differences are set out in **Table A1** below.

Table A1 Project design evolution and Scoping validity

Project design element	Project design in Scoping Report	Project design in EIA Report	Justification
Grid connection	<p>A full 3GW connection in the vicinity of Peterhead; or</p> <p>A 1.5GW connection in the vicinity of Peterhead, with the residual assumption of a 1.5GW connection to New Deer.</p>	A full 3GW connection in the vicinity of Peterhead.	<p>Two options for grid connection were presented at Scoping because these were both under consideration at that time.</p> <p>The removal of the connection that included 1.5GW to New Deer represents a scope refinement resulting from the greater grid connection certainty that now exists. The full 3GW connection in the vicinity of Peterhead remains in scope so any Scoping requirements relating to this remain unchanged and still valid.</p>
Offshore platforms	Accommodation platform included.	Accommodation platform excluded.	The accommodation platform has been removed from the design envelope for reasons explained in Volume 1, Chapter 3: Site Selection and Consideration of Alternatives . This represents a reduced and refined scope for the design envelope so any Scoping requirements relating to the accommodation platform are no longer relevant.
Offshore platforms	Gravity base foundations included	Gravity base foundations excluded.	Gravity base foundations have been removed from the design envelope for reasons explained in Volume 1, Chapter 3: Site Selection and Consideration of Alternatives . This represents a reduced and refined scope for the design envelope so any Scoping requirements relating to gravity base foundations are no longer relevant.
Landfall	Open cut / fill landfall included.	Commitment to trenchless techniques.	The Project's commitment to trenchless techniques for landfall installation is noted in Volume 1, Chapter 4: Project Description and commitment M-005 in Appendix 5.2: Commitments Register . This represents a reduced and refined scope for the design envelope so any Scoping requirements relating to open cut / fill techniques are no longer relevant. Trenchless techniques were included as an option at Scoping so

Project design element	Project design in Scoping Report	Project design in EIA Report	Justification
			any Scoping requirements relating to this remain unchanged and still valid.
Landfall	Number of transition joint bays (TJBs) is eight.	Number of TJBs is seven.	The reduction in number of TJBs represents a reduced and refined scope for the Project design. Any mitigations and Scoping requirements relating to the TJBs are relevant irrespective of the number of TJBs. Therefore, any Scoping requirements relating to TJBs remain unchanged and still valid.
Landfall	TJB dimensions 5m x 10m (approximately).	TJB dimensions of 3.5m x 12m x 2.5m (width x length x depth).	The dimensions of the TJBs are slightly larger in the EIA compared to those presented at Scoping. However, the approach to the assessment and any associated mitigations are the same regardless of the dimensions. Therefore, the Scoping requirements relating to TJBs remain unchanged and still valid.
Landfall	Landfall construction compound dimensions 175m x 100m (approximately).	Landfall temporary construction compound dimensions up to 345m x 70m (length x width) (combined for all three phases).	The dimensions of the landfall construction compounds are slightly larger in the EIA compared to those presented at Scoping. However, the approach to the assessment and any associated mitigations are the same regardless of the dimensions. Therefore, the Scoping requirements relating to landfall construction compounds remain unchanged and still valid.
WTGs	Minimum air gap between rotor blade tip and sea level of 24m.	Minimum air gap between rotor blade tip and sea level of 22m.	<p>The Applicant has undertaken a comprehensive market review of the supply chain and determined that it is not possible for the Applicant to commit to a minimum air gap of 24m at this early stage of the Project lifecycle. This is because the current floating offshore wind supply chain lacks the resilience and maturity required to guarantee such specifications without jeopardising Project delivery. This would cause the Project to fail to deliver against five of its six Project objectives.</p> <p>An adjustment of the minimum air gap to 22m ensures that the Project retains the flexibility needed to procure offshore</p>

Project design element	Project design in Scoping Report	Project design in EIA Report	Justification
			<p>infrastructure within the required timeframes and supports the delivery of the first five Project objectives.</p> <p>The optimisation of design flexibility at this stage also enhances the likelihood of the Project leveraging Scotland's local supply chain for component fabrication. This would support the Project in delivering its sixth and final Project objective.</p> <p>It is important to note that the proposed adjustment to a 22m air gap is the minimum to be considered for future engineering design works. It is not necessarily indicative of the WTG air gap that will be selected following detailed design, which could be higher.</p> <p>A more detailed justification for this design refinement including detail on how this adjustment supports the Project objectives is provided in the Derogation Case Appendix C WTG Air Gap Supporting Document.</p> <p>During the Pre-Application stage in 2025, the Project has proactively engaged MD-LOT and NatureScot a number of times in relation to the air gap design parameter, and the approach to and findings of the collision risk modelling. This was to ensure that the approach taken aligns with the available guidance and the wider expectations of relevant key stakeholders. MD-LOT and NatureScot have been accepting of the approach and findings presented during this engagement. Therefore, the Project considers that the Scoping requirements relating to the rotor blade air gap as relevant to collision risk for birds remain unchanged and still valid.</p>
Cables	Offshore export cable length up to 120km.	Offshore export cable length up to 130km to 140km.	The length of the offshore export cable is slightly longer in the EIA compared to that presented at Scoping. However, the approach to the assessment and any associated mitigations are

Project design element	Project design in Scoping Report	Project design in EIA Report	Justification
			the same regardless of the dimensions. Therefore, the Scoping requirements relating to the offshore export cable remain unchanged and still valid.
Construction duration	Construction programme up to eight years.	Up to 12 years.	The construction programme duration has been extended from eight years to 12 years since Scoping. While this is a longer overall duration, it more accurately reflects the Project's anticipated timeline given what is understood of installation techniques and supply chain readiness. The approach to the assessments presented at Scoping and any relevant mitigations proposed have not changed as a result of this construction programme extension. The EIA has therefore considered the worst case for this design consideration and therefore, the Scoping requirements relating to the construction programme remain unchanged and still valid.

MarramWind

