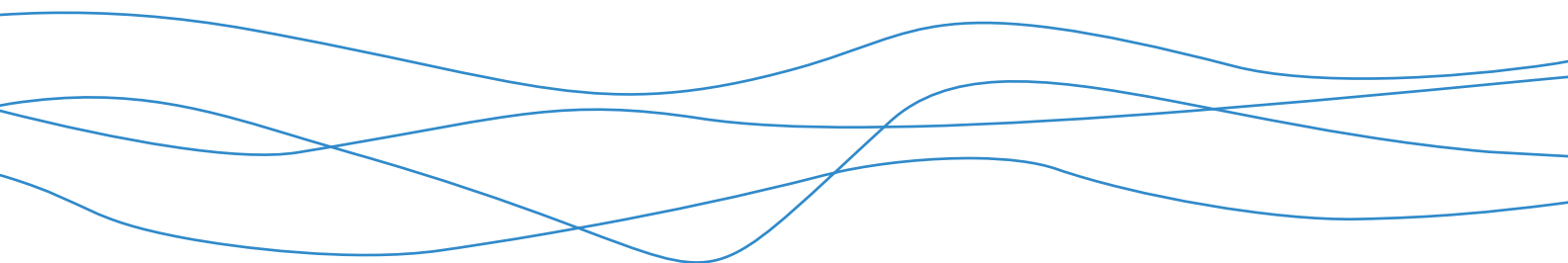




Bowdun Offshore Wind Farm, Offshore EIA Report

Volume 3, Technical Appendix 4.6: Schedule of
Mitigation and Commitments

TWP-BOW-RPS-OFE-RPT-00009 | April 2026



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Glossary

Defined term	Definition
Applicant (the)	Bowdun Offshore Wind Farm Limited (BOWFL).
Bowdun Offshore Wind Farm Limited (BOWFL)	A Special Purpose Vehicle (SPV) (legal entity) for the purpose of developing the Project. BOWFL are the Applicant for the Offshore Application.
Effect	Term used to express the consequence of an impact (i.e. the result of change or changes on specific environmental resources or receptors). The significance of an effect is determined by correlating the magnitude of the impact with the importance, or sensitivity of the receptor or resource in accordance with defined significance criteria.
Embedded Mitigation	Measures that are adopted as part of the Proposed Development and therefore assessed within the EIA. The proposed approach for the EIA for the Proposed Development is that Embedded Mitigation includes both primary mitigation and tertiary mitigation. These are defined by the ISEP as follows: Primary: Modifications to the location or design of the development made during the pre-application phase that are an inherent part of the project, and do not require additional action to be taken. Tertiary: Actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements, or actions that are considered to be standard practices used to manage commonly occurring environmental effects.
Environmental Impact Assessment (EIA)	Process for the assessment of likely significant environmental effects of a project on the physical, biological and human environment during construction, Operation and Maintenance (O&M) and decommissioning.
Export Cable Corridor	The area seaward of MHWS which connects the Array Area with the Landfall within which the Offshore Export Cables will be installed.
Impact	A change caused by an action that occurs during a project's lifetime.
Inter-Array Cables (IAC)	Cables which link the Wind Turbines to each other and with the OSPs.
Interconnector Cables	Cables which will connect individual OSPs to each other to provide redundancy against cable failure elsewhere.
Offshore Environmental Impact Assessment (EIA) Report (hereafter, 'Offshore EIA Report')	Document prepared to report the findings of the EIA for the Proposed Development and produced in accordance with the EIA Regulations. The Offshore EIA Report is submitted to support the Offshore Application for the Proposed Development, and to comply with EIA Regulations.
Offshore Export Cables	Subsea cables used to transmit electricity generated offshore by the Wind Turbines from the OSPs to shore. The Transition Joint Bay (TJB) is the location where the Offshore Export Cables terminate, and the onshore cabling begins.

Defined term	Definition
Offshore Generation Assets	The infrastructure of the Proposed Development required to generate electricity comprising of the Wind Turbines, Wind Turbine foundations and associated infrastructure (e.g. IACs).
Offshore Infrastructure	All of the Offshore Infrastructure associated with the Proposed Development that is located seaward of MHWS, comprising the Offshore Generation Assets and the Offshore Transmission Assets.
Offshore Substation Platform(s) (OSPs)	OSPs comprise the support structure, topside and electrical components used for collecting and/or converting electricity generated by the Wind Turbines for transmission by the Offshore Export Cables.
Offshore Transmission Assets	The infrastructure of the Proposed Development required to transmit the generated electricity comprising of the OSPs, Offshore Export Cables and associated infrastructure up to MHWS.
Onshore Transmission Assets	The transmission infrastructure associated with the Project above MLWS which is subject to the Planning Permission in Principle (PPP) Application submitted to Aberdeenshire Council (REF: APP/2025/1952).
Operation and Maintenance (O&M)	The phase of the Proposed Development following completion of construction. This phase of development includes routine inspections, repairs and replacement of infrastructure and equipment (including Interconnector Cables and IACs), Scour Protection replenishment or replacement, major component replacement, painting and/or other coating works, removal of marine growth, and replacement of access ladders.
Project (the)	An overarching term for the Bowdun Offshore Wind Farm (Bowdun OWF) comprising the offshore and onshore infrastructure required to generate and transmit electricity from the Array Area to the onshore GCP. The Project includes the Offshore Generation Assets, the Offshore Transmission Assets and the Onshore Transmission Assets.
Proposed Development	Term used to define the Offshore Infrastructure associated with the Project seaward of MHWS for which consent is being sought. Further details of the parameters are included in Volume 1, Chapter 3: Project Description.
Study Area	For each environmental topic, the baseline environment will be characterised, and the potential environmental impacts will be described within a topic-specific study area. Specific study areas are defined for each topic and are based on the maximum spatial extent across which potential impacts of the Project may be experienced by the relevant receptors (i.e. Zone of Influence).
Thistle Wind Partners (TWP)	Company established for the development of the Project.
Wind Turbines	Structures comprising of a tubular tower, rotor blades, and a nacelle which houses the Wind Turbine generator.

Acronyms

Acronym	Definition
ADD	Acoustic Deterrent Device
AEZ	Archaeological Exclusion Zone
AtoN	Aids to Navigation
CaP	Cable Plan
CBA	Cable Burial Assessment
CBRA	Cable Burial Risk Assessment
CMS	Construction Method Statement
COLREGS	International Regulations for Preventing Collisions at Sea
CSIP	Cable Specification and Installation Plan
DGC	Defence Geographic Centre
DSLP	Development Specification and Layout Plan
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ERCoP	Emergency Response Cooperation Plan
FLO	Fisheries Liaison Officer
LMP	Lighting and Marking Plan
MCA	Maritime & Coastguard Agency
MD-LOT	Marine Directorate-Licensing Operations Team
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MMMP	Marine Mammal Mitigation Protocol
MPCP	Marine Pollution Contingency Plan
NLB	Northern Lighthouse Board
NtM	Notice to Mariners
O&M	Operation and Maintenance
OMP	Operation and Maintenance Programme
OSP	Offshore Substation Platforms
OWF	Offshore Wind Farm
PAD	Protocols for Archaeological Discoveries
ROV	Remotely Operated Vehicle
UK	United Kingdom
UXO	Unexploded Ordnance
VMP	Vessel Management Plan
WSI	Written Schemes of Investigation

1 Introduction

- 1.1.1 This appendix of the Offshore Environmental Impact Assessment (EIA) Report provides a summary of all Embedded and Additional Mitigation measures and monitoring commitments identified and agreed within the Offshore EIA Report for offshore elements of the Bowdun Offshore Wind Farm (OWF) (hereafter referred to as the 'Proposed Development'). This summary is displayed in Table 1.1 (Embedded and Additional Mitigation measures) and Table 1.2 (Monitoring Commitments). The means of implementation are provided for each mitigation measure and monitoring commitment.

Table 1.1: Embedded and Additional Mitigation Measures for the Proposed Development

Reference	Proposed Development Phase			Mitigation Measure	Mitigation Category*	Relevant Topics in the Offshore EIA Report																Means of Implementation	Corresponding Management Plan within the Application
	Construction	O&M	Decommissioning			Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA	Cultural Heritage	Climate Change		
1	✓	×	×	Development of, and adherence to, a Cable Specification and Installation Plan (CSIP) post-consent.	E	✓	✓	✓				✓	✓			✓						Secured in the Section 36 Consent and Marine Licences, via the requirement for a CSIP	
2	✓	✓	×	Use of anti-corrosion protective coatings and Scour Protection where there is potential for scour to develop around the Offshore Infrastructure, and it is appropriate to do so.	E	✓	✓					✓	✓			✓					✓	Secured in the Section 36 Consent and Marine Licences, via the Scour Management Plan	Volume 4, Appendix 30: Outline Scour Protection Management Plan
3	✓	×	×	Development of, and adherence to, a Piling Strategy. This will detail use of Acoustic Deterrent Devices (ADDs), slow start, soft start, and ramp up procedures, as appropriate, as well as any Additional Mitigation measures, where determined to be required, in consultation with stakeholders including NatureScot and Marine Directorate-Licensing Operations Team (MD-Lot).	E			✓	✓			✓										Secured in the Section 36 Consent and Marine Licences, via the Piling Strategy	
4	✓	✓	✓	Development of, and adherence to, a Cable Burial Risk Assessment (CBRA) and the Cable Burial Assessment (CBA). Implementation, management and monitoring of cable protection, via burial or external protection where adequate burial depth is not feasible, will be undertaken as informed by these assessments. Results of these assessments, and commitments to post construction monitoring, will be provided in the Cable Plan (CaP).	E	✓	✓	✓				✓	✓			✓						Secured in the Section 36 Consent and Marine Licences, via the CBRA. CBA and CaP.	
5	✓	✓	✓	Development of, and adherence to, an Environmental Management Plan (EMP), including a Marine Pollution Contingency Plan (MPCP) and a Biosecurity Plan with commitments to monitoring and actions to minimise Invasive Non-Native Species (INNS).	E	✓	✓	✓	✓	✓		✓	✓			✓					✓	Secured in the Section 36 Consent and Marine Licences, via the requirement for an EMP, MPCP, MMMP, and Biosecurity Plan.	Volume 4, Appendix 24: Outline Environmental Management Plan Volume 4, Appendix 25: Marine Pollution Contingency Plan Volume 4, Appendix 26: Marine Invasive and Non Native Species Biosecurity Plan

Reference	Proposed Development Phase			Mitigation Measure	Mitigation Category*	Relevant Topics in the Offshore EIA Report															Means of Implementation	Corresponding Management Plan within the Application	
	Construction	O&M	Decommissioning			Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA	Cultural Heritage			Climate Change
6	✓	×	×	Development of, and adherence to, a Marine Mammal Mitigation Protocol (MMMP), to minimise the risk of auditory injury to marine mammals from noise generating activities resulting from the construction of the Proposed Development. Mitigation will include measures such as Marine Mammal Observers (MMOs), Passive Acoustic Monitoring (PAM) and ADDs.	E			✓	✓													Secured in the Section 36 Consent and Marine Licences, via the requirement for an MMMP	Volume 4, Appendix 27: Outline Marine Mammal Mitigation Protocol
7	✓	×	×	Development of, and adherence to, a Construction Method Statement (CMS) along with a Code of Construction Practice (CoCP).	E	✓	✓	✓	✓	✓		✓	✓	✓		✓	✓	✓	✓		✓	Secured in the Section 36 Consent and Marine Licences, via the requirement for a CMS	
8	✓	✓	✓	All relevant Health and Safety Executive (HSE) procedures will be followed.	E		✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓			Required in accordance with relevant health and safety legislation	
9	✓	✓	✓	Development of, and adherence to, a combined Navigational Safety and Vessel Management Plan (NSVMP), describing Project vessels’ requirements, passages, monitoring and controls.	E			✓	✓	✓		✓	✓	✓		✓	✓					Secured in the Section 36 Consent and Marine Licences, via the requirement for an NSVMP	Volume 4, Appendix 29: Outline Navigational Safety and Vessel Management Plan
10	✓	✓	✓	Development of, and adherence to, a Fisheries Mitigation, Monitoring and Communication Plan (FMMCP). The FMMCP includes details of the measures which are proposed to be implemented to reduce impacts on commercial fishing, the approach to monitoring fisheries activity and the approach to fisheries liaison and procedures to manage interactions between the Proposed Development and the fishing industry.	E							✓				✓	✓					Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP	Volume 4, Appendix 28: Fisheries Mitigation, Monitoring and Communication Plan
11	✓	✓	✓	Appointment of a Company Fisheries Liaison Officer (CFLO). The CFLO will support ongoing liaison and ensure clear communication between the Applicant and commercial fishers.	E							✓	✓				✓					Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP	Volume 4, Appendix 28: Fisheries Mitigation, Monitoring and Communication Plan
12	✓	✓	✓	Advance warning and accurate location details of planned operations, associated Safety Zones and advisory passing distances will be given via Notices to Mariners (NtMs) and Kingfisher Bulletins.	E							✓	✓		✓	✓	✓					Secured in the Section 36 Consent and Marine Licences, via the requirement for advance warnings	

Reference	Proposed Development Phase			Mitigation Measure	Mitigation Category*	Relevant Topics in the Offshore EIA Report														Means of Implementation	Corresponding Management Plan within the Application		
	Construction	O&M	Decommissioning			Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA			Cultural Heritage	Climate Change
13	✓	✓	✓	Development of, and adherence to, a Lighting and Marking Plan (LMP). The LMP will confirm compliance with legal requirements with regards to shipping, navigation and aviation marking and lighting.	E			✓				✓	✓		✓	✓	✓					Secured in the Section 36 Consent and Marine Licences, via the requirement for an LMP.	Volume 4, Appendix 31: Outline Lighting and Marking Plan
14	✓	✓	✓	Adherence to best practice guidance with regards to fisheries liaison and procedures in the event of interactions between the Proposed Development and fishing activities (e.g. Fisheries Liaison with Offshore Wind and Wet Renewables group (FLOWW), 2025).	E							✓				✓	✓					Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP	Volume 4, Appendix 28: Fisheries Mitigation, Monitoring and Communication Plan
15	✓	✓	✓	Participation in relevant commercial fisheries working group.	E							✓					✓					Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP	Volume 4, Appendix 28: Fisheries Mitigation, Monitoring and Communication Plan
16	✓	✓	✓	Application for, and use of, Safety Zones of up to 500 m during construction, major maintenance, and decommissioning phases. Advisory safe passing distances of up to 500 m will also be applied for mobile installation vessels.	E			✓				✓	✓		✓	✓						Secured via an application for Safety Zones prior to construction, maintenance or decommissioning commencing.	
17	✓	✓	✓	Any objects dropped on the seabed during works associated with the Proposed Development will be reported in line with MD-LOT procedures and objects will be recovered where they pose a hazard to other marine users and where recovery is possible.	E							✓	✓		✓	✓						Secured in the Section 36 Consent and Marine Licences, via the Dropped Object Procedure detailed in EMP	Volume 4, Appendix 24: Outline Environmental Management Plan
18	✓	✓	✓	All vessels working on the Proposed Development will meet the required certification standards and carriage requirements, along with following international marine regulations.	E			✓				✓	✓			✓					✓	Secured in the Section 36 Consent and Marine Licences, via the requirement for a NSVMP	Volume 4, Appendix 29: Outline Navigational Safety and Vessel Management Plan
19	✓	✓	✓	Details of any temporary obstacles associated with the Proposed Development which are of more than 91.4 m in height are to be alerted to aircrews by means of the Notice To Aviation Missions (NOTAM) system.	E									✓	✓	✓						Secured in the Section 36 Consent and Marine Licences	Volume 4, Appendix 31: Outline Lighting and Marking Plan Volume 4, Appendix 32: Outline Aid to Navigation Management Plan
20	✓	✓	✓	Suitable Aids to Navigation (AtoN) lighting and marking of the Proposed Development including construction buoyage and the use of a Cable Marker Board shall be	E			✓				✓	✓		✓	✓						International Association of marine AtoN and Lighthouse Authorities	Volume 4, Appendix 31: Outline Lighting and Marking Plan

Reference	Proposed Development Phase			Mitigation Measure	Mitigation Category*	Relevant Topics in the Offshore EIA Report															Means of Implementation	Corresponding Management Plan within the Application	
	Construction	O&M	Decommissioning			Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA	Cultural Heritage			Climate Change
				implemented complying with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) Recommendations G1162 (IALA, 2021), to be finalised and approved in consultation with the Maritime and Coastguard Agency (MCA) and Northern Lighthouse Board (NLB) through a LMP.																	(IALA) Recommendations G1162	Volume 4, Appendix 32: Outline Aid to Navigation Management Plan	
21	✓	✓	✓	Wind Turbine design to have a minimum lower blade tip height of 33.12 m above Lowest Astronomical Tide (LAT),	E			✓		✓	✓		✓									Secured in the Section 36 Consent and Marine Licences	
22	✓	✓	✓	Development of, and adherence to, an Emergency Response Cooperation Plan (ERCoP) in consultation with the Maritime & Coastguard Agency (MCA).	E							✓	✓	✓	✓	✓						Secured in the Section 36 Consent and Marine Licences, via the requirement for an ERCoP	
23	✓	✓	×	Development of, and adherence to, an Operation and Maintenance Programme (OMP) in conjunction with approved post-consent construction plans.	E			✓				✓	✓	✓	✓	✓	✓				✓	Secured in the Section 36 Consent and Marine Licences	
24	✓	×	×	Development of, and adherence to, a Development Specification and Layout Plan (DSLPL). The development of the DSLP includes consultation with the relevant authorities for approval, including the MCA and NLB.	E			✓	✓	✓		✓	✓		✓	✓		✓	✓	✓		Secured in the Section 36 Consent and Marine Licences and the requirement for a DSLP.	
25	✓	×	×	Civil Aviation Authority (CAA) will be informed of the locations, heights and lighting status of the Wind Turbines, including estimated dates of construction at least 6 months prior to the estimated start of construction.	E									✓		✓						Secured in the Section 36 Consent and Marine Licences	
26	✓	✓	✓	The Applicant will work with other developers, Government, and key stakeholders to assist in addressing barriers to local supply chain participation.	E												✓					Supply Chain Development Statement (SCDS)	
27	✓	✓	✓	The Applicant will engage with local supply chain as part of a developing strategy to leverage oil and gas competencies and maximise local content as much as practicable for the Proposed Development.	E												✓					Supply Chain Development Statement (SCDS)	
28	✓	✓	✓	The Energy Pathfinder will be followed to ensure visibility of the work programme and an opportunity for Scottish and United Kingdom (UK) suppliers to bid for work.	E												✓					Supply Chain Development Statement (SCDS)	

Reference	Proposed Development Phase			Mitigation Measure	Mitigation Category*	Relevant Topics in the Offshore EIA Report														Means of Implementation	Corresponding Management Plan within the Application	
	Construction	O&M	Decommissioning			Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA			Cultural Heritage
29	✓	✓	✓	The identification and implementation of Archaeological Exclusion Zones (AEZs) around receptors identified as having a known archaeological potential.	E												✓				Secured in the Section 36 Consent and Marine Licences, via the requirement for a WSI and PAD	Volume 4, Appendix 33: Written Scheme of Investigation and Protocol for Archaeological Discovery
30	✓	✓	✓	The development and implementation of a Written Schemes of Investigation (WSI) and Protocol for Archaeological Discovery (PADs).	E												✓				Secured in the Section 36 Consent and Marine Licences, via the requirement for a WSI and PAD	Volume 4, Appendix 33: Written Scheme of Investigation and Protocol for Archaeological Discovery
31	✓	✗	✗	Archaeological input into the specifications of relevant site pre-construction geophysical, geotechnical and Remotely Operated Vehicle (ROV) surveys with appropriate monitoring or analysis, if necessary.	E												✓				Secured in the Section 36 Consent and Marine Licences, via the requirement for a WSI	Volume 4, Appendix 33: Written Scheme of Investigation and Protocol for Archaeological Discovery
32	✓	✗	✗	The Applicant will consider, as far as reasonably possible, the procurement of materials fabricated within the UK for installation as part of the Offshore Infrastructure.	E											✓				✓	Secured in the Section 36 Consent and Marine Licences, and through the Applicant's commitment required through the ScotWind Leasing process and in accordance with the Project SCDS.	
33	✓	✗	✗	Offshore Infrastructure will be designed to be resilient to climate risks, such as storms and waves, with factors of safety incorporated into the design.	E										✓					✓	Secured in the Section 36 Consent and Marine Licences	
34	✗	✗	✓	Drafting and implementation of a decommissioning programme, prepared in accordance with requirements of the Energy Act 2004, which will set out the extent of infrastructure to be removed as well as the methods and processes which will be used.	E	✓	✓	✓	✓			✓	✓	✓	✓	✓	✓	✓	✓		Secured in the Section 36 Consent and Marine Licences, via the requirement for a decommissioning programme.	
35	✓	✓	✗	Colouration of the Wind Turbines and blades to industry standard (light grey).	E													✓	✓		Secured in the Section 36 Consent and Marine Licences	
36	✓	✗	✗	Where practicable, the use of low order disposal of Unexploded Ordnance (UXOs) will be implemented (i.e. deflagration).	E			✓	✓	✓											Secured in the Section 36 Consent and Marine	Volume 4, Appendix 24: Outline Environmental Management Plan

Reference	Proposed Development Phase			Mitigation Measure	Mitigation Category*	Relevant Topics in the Offshore EIA Report																Means of Implementation	Corresponding Management Plan within the Application
	Construction	O&M	Decommissioning			Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA	Cultural Heritage	Climate Change		
																						Licences, via the requirement for an EMP	
37	✓	×	×	Adoption of Joint Nature Conservation Committee (JNCC) guidelines for minimising the risk of injury to marine mammals from geophysical surveys, piling noise and use of explosives if and where required.	E				✓													Secured in the Section 36 Consent and Marine Licences, via the requirement for an MMMP	Volume 4, Appendix 27: Outline Marine Mammal Mitigation Protocol
38	✓	✓	✓	Identification and implementation of Temporary Exclusion Zones (TEZs) around encounters of previously unknown archaeological sites.	E													✓				Secured in the Section 36 Consent and Marine Licences, via the requirement for a WSI and PAD	Volume 4, Appendix 33: Written Scheme of Investigation and Protocol for Archaeological Discovery
39	✓	×	×	Design and micro-siting of Offshore Infrastructure to avoid known archaeological receptors, including those identified in pre-construction surveys.	E													✓				Secured in the Section 36 Consent and Marine Licences	
40	✓	✓	✓	Creation of a Waste Management Plan (WMP), which will describe the processes for handling and managing any waste materials.	E	✓	✓	✓	✓			✓	✓		✓	✓					✓	Secured in the Section 36 Consent and Marine Licences, via the requirement for an EMP	Volume 4, Appendix 24: Outline Environmental Management Plan
41	✓	✓	✓	The Proposed Development will be marked on admiralty charts including an appropriate chart note.	E							✓	✓		✓	✓						Secured in the Section 36 Consent and Marine Licences	
42	✓	✓	✓	Compliance of project vessels with international marine regulations as adopted by the Flag State, including International Regulations for Preventing Collisions at Sea (COLREGS) (IMO, 1972) and International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974).	E			✓				✓	✓		✓	✓						Secured in the Section 36 Consent and Marine Licences	
43	✓	×	×	Use of a trenchless technique (e.g. Horizontal Directional Drilling or pipe jack tunnelling) as the Landfall installation option.	E	✓	✓			✓			✓									Secured in the Section 36 Consent and Marine Licences	

Reference	Proposed Development Phase			Mitigation Measure	Mitigation Category*	Relevant Topics in the Offshore EIA Report														Means of Implementation	Corresponding Management Plan within the Application	
	Construction	O&M	Decommissioning			Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA			Cultural Heritage
44	✓	✓	×	Where the Proposed Development cables will be required to cross an active cable or pipeline, it is intended that a commercial ‘crossing agreement’ will be entered into with the asset owner. This is a formal arrangement that establishes the responsibilities and obligations of both parties and allows construction and operations to be managed safely.	E									✓	✓						Commercial crossing agreements to be agreed in consultation with relevant asset owners, under Article 79 of the United Nations Convention on the Law of the Sea (UNCLOS)	
45	✓	✓×	×	Proximity agreements will be established with relevant cable and pipeline operators, to minimise the potential for any impact in accordance with recognised industry good practice.	E									✓							Secured in the Section 36 Consent and Marine Licences, and via proximity agreements in consultation with relevant cable and pipeline operators	
46	×	✓	×	Wind Turbines will be of consistent form and rotor diameter.	E												✓	✓			Secured in the Section 36 Consent and Marine Licences	
47	✓	✓	×	Details of all permanent offshore structures of more than 91.4 m in height will be provided to the Defence Geographic Centre (DGC) to allow these to be charted on aeronautical charts prior to construction.	E								✓								Secured in the Section 36 Consent and Marine Licences	
48	✓	×	×	Where boulder removal is required during site preparation, the location of large boulders that are relocated and may pose a snagging risk for fishing gear, will be disclosed to the fishing industry within a timely manner and in an accessible format.	E							✓	✓			✓					Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP	Volume 4, Appendix 28: Fisheries Mitigation, Monitoring and Communication Plan
49	✓	✓	✓	Where appropriate, guard vessels will also be used to ensure adherence with Safety Zones or advisory passing distances to mitigate any impact which poses risk to surface navigation during construction, O&M and decommissioning phases. Such impacts may include partially installed structures or cables, extinguished navigation lights or other unmarked hazards.	E							✓	✓		✓	✓					Secured in the Section 36 Consent and Marine Licences	

Reference	Proposed Development Phase			Mitigation Measure	Mitigation Category*	Relevant Topics in the Offshore EIA Report															Means of Implementation	Corresponding Management Plan within the Application		
	Construction	O&M	Decommissioning			Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA	Cultural Heritage			Climate Change	
50	✓	✓	✓	MGN 654 Annex 4 (MCA, 2021) requires that hydrographic surveys will fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager and the United Kingdom Hydrographic Office (UKHO).	E							✓	✓		✓	✓							Secured in the Section 36 Consent and Marine Licences	
51	✓	✓	✗	Safety margin within the Wind Turbine design to be fitted with automatic shutdowns/lockdowns with regards to spinning too fast.	E																✓		Secured in the Section 36 Consent and Marine Licences	
52	✗	✓	✗	Electrical plant within the Offshore Substation Platform(s) (OSPs) will be cooled by means of natural ventilation or by forced HVAC. Both cooling and heating will be applied when necessary to avoid overheating of equipment.	E																✓		Secured in the Section 36 Consent and Marine Licences	
53	✓	✗	✗	Low order clearance techniques are the default method for UXO clearance (Mitigation measure 36) and would not require Additional Mitigation over and above the Embedded Mitigation measures within the outline MMMP (Volume 4, Appendix 27: Outline Marine Mammal Mitigation Protocol). However, should high order clearance be unavoidable Additional Mitigation may be required dependant on the results of the UXO Risk Assessment. Appropriate mitigation measures will be discussed and agreed with MD-LOT and NatureScot with the detail to be agreed for the finalised MMMP.	A			✓	✓	✓													Secured in the Section 36 Consent and Marine Licences	Volume 4, Appendix 27: Outline Marine Mammal Mitigation Protocol
54	✓	✓	✓	Development of, and adherence to, a Project Environmental Monitoring Plan (PEMP) to include details of any agreed surveys or monitoring requirements. The PEMP will provide the mechanism to validate the impact assessment, assess the effectiveness of mitigation measures, and inform adaptation of mitigation measures throughout the construction and O&M phases of the Proposed Development.	E			✓	✓	✓		✓											Secured in the Section 36 Consent and Marine Licences, via the requirement for a PEMP	

Reference	Proposed Development Phase			Mitigation Measure	Mitigation Category*	Relevant Topics in the Offshore EIA Report														Means of Implementation	Corresponding Management Plan within the Application	
	Construction	O&M	Decommissioning			Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA			Cultural Heritage
55	✓	×	×	The Applicant will enter into Disruption Agreements, where appropriate, to mitigate justifiable disturbance to fishing activity experienced through temporary loss of access due to offshore works associated with the Proposed Deveopment. Agreements will be evidence-based and implemented where demonstrable disruption to fishing activity occurs.	E							✓									Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP	Volume 4, Appendix 28: Fisheries Mitigation, Monitoring and Communication Plan
56	✓	×	×	Drafting of an Accommodation Strategy, once port location(s) is known, to support construction activity.	E										✓						Secured in the Section 36 Consent and Marine Licences	

*Mitigation Category refers to Embedded Mitigation (E) and Additional Mitigation (A).

Table 1.2: Monitoring Commitments for the Proposed Development

Reference	Proposed Development Phase			Monitoring Commitment	Relevant Topics in the Offshore EIA Report														Justification	Means of Implementation	
	Construction	O&M	Decommissioning		Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA			Cultural Heritage
1	✓	✓	✓	Monitoring of AEZs will be carried out to confirm that no impact has occurred to the archaeological receptors within the proposed AEZs (The Crown Estate, 2021). This will be undertaken at a minimum: • Post construction; • Post-decommissioning.												✓				Although no potentially significant effects are identified to marine archaeology receptors in Volume 2, Chapter 19: Marine Archaeology, monitoring is proposed to verify this.	Through the archaeological assessment of relevant geophysical data (acquired by the Applicant for any purpose) or by other means (such as ROV survey) agreed with HES in a method statement. Further details are provided in the Volume 4, Appendix 33: Written Scheme of Investigation and Protocol for Archaeological Discovery.
2	✗	✓	✗	During the O&M phase, monitoring will be undertaken to identify if the seabed morphology has changed and/or cables become exposed.	✓															This monitoring during the O&M phase will support engineering and asset security purposes.	Detailed monitoring commitments will be agreed with MD-LOT post construction, as required, and included in the OMP secured in the Section 36 Consent and/or Marine Licences and submitted to MD-LOT for approval.
3	✓	✓	✓	Engage and contribute to relevant regional and strategic monitoring, where appropriate to do so for the Proposed Development, giving due consideration to the Scottish Marine Energy Research (ScotMER) programme (Scottish Government, 2024) (or any successor programme formed to facilitate these research interests), or any developer lead regional groups.	✓	✓	✓	✓	✓	✓					✓					The Applicant will engage with MD-LOT, NatureScot, and other relevant key stakeholders and contribute to targeted and proportionate regional or strategic monitoring, if appropriate and relevant to the Proposed Development, to better understand the environmental effects of offshore wind taking account of known evidence gaps taking account of Evidence Maps published through the ScotMER forum (Scottish Government, 2024).	Secured in the Section 36 Consent and/or Marine Licences via the requirement for a Project Environmental Monitoring Plan (PEMP).

Reference	Proposed Development Phase			Monitoring Commitment	Relevant Topics in the Offshore EIA Report															Justification	Means of Implementation
	Construction	O&M	Decommissioning		Physical Processes	Benthic Ecology	Fish and Shellfish Ecology	Marine Mammals	Offshore Ornithology	Offshore Bats	Commercial Fisheries	Shipping and Navigation	Aviation and Radar	Infrastructure and Other Users	Major Accidents and Disasters	Socio-Economics	Marine Archaeology	SLVIA	Cultural Heritage		
4	✓	×	×	Contribution to the development of a strategic, regionally coordinated approach to commercial fisheries monitoring to support understanding of cumulative effects.						✓										Due to the significant adverse effects identified in the Volume 2, Chapter 13: Commercial Fisheries.	Secured in the Section 36 Consent and Marine Licences, via the requirement for an FMMCP
5				Prior to construction of the Proposed Development starting, a strong, statistically robust and strategic bird monitoring programme will be considered and agreed in liaison with NatureScot and the MD-LOT. Such monitoring would consider foraging patterns, population trends and productivity for guillemot, razorbill, puffin, great black-backed gulls and kittiwake at the key colonies on the east coast of Scotland, where appropriate. This will aim to build on the NEEOG-funded work carried out since 2023.					✓											To monitor ornithological impacts and validate the conclusions of the Offshore EIA Report.	Secured in the Section 36 Consent and Marine Licences.
6	✓	✓	×	Monitor expenditure throughout the supply chain to evaluate its impacts and determine whether the commitments outlined in the SCDS are being met. This will also help identify necessary actions to ensure the maximisation of spending commitments as per the SCDS.											✓					To monitor socio-economic impacts and validate the conclusions of the Offshore EIA Report.	Secured through the Option for Lease Agreement.
7	✓	✓	×	Review of potential socio-economic impacts following a decision on the construction and O&M ports, including identification of any Additional Mitigation measures.											✓					To monitor socio-economic impacts and validate the conclusions of the Offshore EIA Report.	Revision of impact analysis.

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