



**THISTLE WIND**  
PARTNERS

# **Bowdun Offshore Wind Farm, Onshore EIA Report**

Volume 2, Technical Appendix 1.1: Scoping  
Opinion

TWP-BOW-JCB-ENV-RPT-00009 | November 2025



Our Ref: ENQ/2024/1337

Your Ref:

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24 October 2024

Dear Sir/Madam

**The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017**  
**EIA Scoping Opinion for Onshore Development at Bowdun Offshore Wind Farm**  
**Grid Reference: 379529.778570**

- 1.1 I refer to your request for a scoping opinion for the above proposal received on 5 September 2024. I am now in receipt of all the necessary consultation responses and I can now offer a scoping opinion under Regulation 17 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 (the Regulations). Your request sought advice relating to the content of a future environmental assessment with an Onshore Scoping Report (ref: TWP-BOW-RPS-OSC-RPT-00002) provided for consideration. Only onshore aspects of the project are considered in this response.
- 1.2 A tandem scoping has also been received for the offshore aspects of the project in the form of a consultation from Scottish Government, Marine Directorate Licensing Operations Team, with a separate response provided directly to the determining authority (ENQ/2024/1361).
- 1.3 Schedule 4 of the Regulations states the information which should be included in an Environmental Impact Assessment 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.
- 1.4 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. Environmental issues are of obvious key importance such as those aspects of the environment that would be likely to be significantly affected. Detailed survey work would be required to inform the EIA Report. 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.

1.5 Examples of the types of issues that should be addressed include:

- Climate change,
- Local economic effect,
- Landscape resource,
- Soils and geology,
- Visual amenity,
- Ornithology,
- Visual amenity,
- Ecology,
- Nature conservation,
- European protected species,
- Hydrology and water supplies,
- Forestry and tree felling,
- Transport and traffic,
- Noise,
- Cultural heritage and archaeology,
- Land use,
- Land ownership,
- Tourism and recreation, including footpaths,
- Proposed mitigation measures.

Please note that the above list is by no means exhaustive and that other issues might become obvious following public consultations and consultation with statutory consultees.

1.6 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 and the Planning Service have not provided detailed advice. Once the site area has been refined, and through the pre-application process, it is anticipated that more detailed advice can be given.

2.0 Response Overview

2.1 The response below is split into topics as identified within the Bowdun Offshore Wind Farm Onshore Scoping Report (Ref no:TWP-BOW-RPS-OSC-RPT-00002) where the Planning Service has comment to offer. This should be read in conjunction with the consultee responses summarised in Section 4 with full responses available on the planning portal for the enquiry.

3.0 Chapter topics

*Chapter 3: Project description, Chapter 4: EIA Methodology, Chapter 5: Consultation Process and Chapter 6: Site selection and consideration of alternatives*

3.1 The definition of the proposed onshore development and what infrastructure forms part of the development is clear.

- 3.2 The overall approach to the EIA is considered acceptable and typical for a development of this type in terms of methodology.
- 3.3 It is agreed that the aspects of human health, major accidents or disasters and operational waste are to be scoped out. It is noted however, that where relevant these aspects will be discussed within topic specific chapters where necessary and/or within other supporting information.
- 3.4 The importance of community and stakeholder engagement is highlighted at this point. Aberdeenshire Council would recommend pre-application discussions regarding the statutory and non-statutory consultation proposed however, have no concerns with the proposals detailed within this chapter at present.
- 3.5 The process by which the proposed onshore development's design has been, and will be, refined via the route planning and site selection and is clearly explained within this section.

*Chapter 10: Landscape and visual impact assessment*

- 3.6 The content of the LVIA approach are noted and generally agreed. Further input from the Planning Service can be provided on specific viewpoint selection through the pre-application process, in consultation with the Landscape Advisor as appropriate. It would be expected that photomontages for any sensitive receptors are provided, in addition to wireframes, and include post construction, a year (or other appropriate 'short' timescale) post construction shown with landscaping and post construction on a longer scale (e.g. 10/12 years) with any established landscaping in order to assist assessment.

4.0 Internal Consultee Responses

- 4.1 **Environment and Infrastructure Services – Archaeology** agree that a Cultural Heritage Chapter and assessment should be scoped into the Onshore EIA Report. The following is also agreed: embedded mitigation (section 11.6), proposed assessment methodology (section 11.8), aspects that have been scoped in and out (tables 11.3 & 11.4). In regard to section 11.9, potential inter-relationships, "Land, Trees and Infrastructure" should also be included as any proposed compensatory planting zones will need to be subject to a cultural heritage assessment.
- 4.2 **Environment and Infrastructure Services – Built Heritage** notes that it has been identified within the Scoping report to include historic assets within 3km of the proposed substation (once determined) and 250m from the application boundary (once determined). It is expected that historic assets within 5km should be assessed for potential impact once the exact location of the cable corridor and substation is known. The resultant report should include a Zone of Theoretical Visibility and LVIA study area. Photomontage visualisations would be expected for any assets identified within the assessment which could be impacted as a result of the proposed works. Built Heritage need to be satisfied there is limited potential for the development to impact on any nationally designated heritage asset.

- 4.3 **Environment and Infrastructure Services – Contaminated Land** has provided comment in regard to the topic of contaminated land within the Scoping Report and is satisfied with the proposals.
- 4.4 **Environment and Infrastructure Services – Environmental Health** has confirmed that the following assessments will be required in relation to noise/vibration and air quality: construction noise (and vibration) impact assessment; operational noise impact assessment; dust risk assessment and dust management plan; and air quality screening assessment. Further details of what is to be contained within each of these assessments is contained within the full consultation response. .
- 4.5 **Environment and Infrastructure Services - Environment Team (Natural Heritage)** has reviewed in the information in relation to the following topics:
- Designated sites- Five Local Nature Conservation Sites are missing from the list of sites shown as potentially impacted by the proposed works: Annies Dam, Benholm, Elfhill, Mergie and Todhead Point to Johnshaven Coast. Benholm SSSI is currently scoped out but should be included should the proposed cable laying route change.
  - Priority habitats and protected species- A larger list of species has been identified within the area and should be considered. Invasive non-native species should also be considered. A full assessment of the impact on all habitats including agricultural land will be required in order to calculate biodiversity net loss associated with this development, although not required as part of the EIA process. A full assessment of the impact on woodlands and forestry is also required to assess requirements for compensatory planting.
  - Ornithology- Todhead Point to Johnshaven Coast Local Nature Conservation Site should be included. The wide intertidal zone between Gourdon and Johnshaven is a valuable area of importance to intertidal wetland birds and should be included.
  - Trees- Assessment of impact on trees protected by Tree Preservation Orders will be required including Lathallan and Drumlithie.
  - Access- Other core paths and potential right of ways within the search corridor should be included.
- Reference should be made to the consultation response for full reasons for the above and additional information sources.
- 4.6 **Environment and Infrastructure Services – Flood Risk and Coastal Protection** notes that flood risk is not definable at this stage, but drainage details and flood risk assessments may/will need to be provided to demonstrate how surface water will be managed depending on the final locations of site works.
- 4.7 **Environment and Infrastructure Services – Roads Development** note that the Scoping Report should ensure it considers the overall impact of the project life cycle and the associated impact on Aberdeenshire Council’s public road network. Condition surveys, traffic surveys and route appraisals will be required for all routes associated with the delivery of the project from the boundaries of the trunk road network as appropriate, including routes identified within Section 15.5 of the Scoping Report. A list of likely requirements is included in the full consultation response. A Transport Assessment is required for this development and discussions should be undertaken with this consultee.

#### 4.8 External Consultee Responses

- 4.9 **Historic Environment Scotland** has not responded at the time of writing. Any response received will be provided as an addendum.
- 4.10 **INEOS** has reiterated comments provided during the pre-application consultation. It is also highlighted that damage to pipelines from third party activities in the UK remains a credible risk. In addition, electrical interaction from HV power cables also presents a credible risk to pipeline integrity. Damage, resulting in release of content from MAH pipelines has potential to result in a major accident with serious consequences to public safety and the environment.
- 4.11 **National Gas Transmission** require further assessment as the proposal is within the High Risk Zone from National Gas Transmissions apparatus and further assessment is needed from Asset Protection.
- 4.12 **Network Rail** strongly suggest the inclusion of the following issues within the scoping response to ensure that potential impacts of both the construction and operational development on the current and future safe and efficient operation of the railway are assessed: A Traffic Assessment should be included to assess the effects of construction traffic on existing traffic flows and the public road network; and details of proposed construction and engineering works in the vicinity of the railway line.
- 4.13 **NatureScot** advise that the Burn of Benhold SSSI should be scoped in, unless it can be determined that this is excluded from the search area and won't be affected by the proposals. There are also a number of Local Nature Conservation Sites (LNCS) that should be scoped in. It is noted that the scoping boundary contains a number of sites on the Ancient Woodland Inventory: where it is not possible to avoid loss of part of an ancient woodland site, carrying out woodland creation would not compensate for this loss. Annex 1 of the EU Habitats Directive habitats within the scoping boundary include 1220 Perennial vegetation of stony banks, and potentially 9180 Tilio-Acerion forests of slopes, screes and ravines and 91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles should be considered further in the EIA. Scottish Biodiversity List species and habitats also need to be considered.
- 4.14 **Scottish Environment Protection Agency** have provided comments which lie within their remit. To avoid delay and potential objection, the EIA submission must contain a series of scale drawings of sensitivities, listed in the full consultation response. This consultee welcomes the commitment to undertake a national vegetation classification survey and highlight the presence of a Scottish Wetland Inventory sites which should be avoided and given appropriate buffers. It is agreed that private water supplies (PWS) should be scoped into the EIA and should include the source of any PWS. An incorrect reference to the SEPA Flood risk mapping is included within the scoping report. It is recommended the applicant undertakes further geomorphological assessments of any proposed crossing and/or infrastructure located near the Bervie Water (which has recommended 50m buffers in places), Forthie Water and Carron Water. Riparian planting as part of any biodiversity net gain proposals would be welcome on Burn of Benholm, Bervie Water, Forthie Water and Carron Water.

- 4.15 **Scottish Forestry** highlight the need to refer to the Scottish Governments Control of Woodland Removal Policy along with guidance documents issued by Scottish Forestry. Information should be utilised through the Scottish Forestry Open Data Portal. This consultee requests that a standalone chapter of 'Woodland management and tree felling' be included within the EIAR and should recognise the social, economic and environmental values of the forest and the woodland habitat. Further recommendations on what to be included within such a chapter is included in the full consultation response.
- 4.16 **Scottish Gas Networks** has not responded at the time of writing. Any response received will be provided as an addendum.
- 4.17 **Scottish Water** notes that there is live infrastructure in the vicinity of the development area that may impact on existing Scottish Water assets. Further discussion with Scottish Water is encouraged.
- 4.18 **Shell UK** has no objection in principle to the work described in the enquiry, the areas of concern include the proposed method of installing the cables below the pipelines; controlling potential vehicular pipeline crossings during construction; and the risk of AC and DC induced interference affecting the integrity of the pipeline. Further discussion is welcomed by this consultee.
- 4.19 Conclusion
- 4.20 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.
- 4.21 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.

Yours faithfully



Paul Macari  
Head of Planning and Economy