

Pentland floating offshore wind farm

Volume 2: Offshore EIAR

Chapter 4: Stakeholder Engagement



OFFSHORE EIAR (VOLUME 2): MAIN REPORT

CHAPTER 4: STAKEHOLDER ENGAGEMENT

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GLOSSARY OF PROJECT TERMS

Key Terms	Definition
Dounreay Tri Floating Wind Demonstration Project (the 'Dounreay Tri Project')	The 2017 consented project that was previously owned by Dounreay Tri Limited (in administration) and acquired by Highland Wind Limited (HWL) in 2020. The Dounreay Tri Project consent was for two demonstrator floating Wind Turbine Generators (WTGs) with a marine licence that overlaps with the Offshore Development, as defined. The offshore components of the Dounreay Tri Project consent are no longer being implemented.
Highland Wind Limited	The Developer of the Project (defined below) and the Applicant for the associated consents and licences.
Landfall	The point where the Offshore Export Cable(s) from the PFOWF Array Area, as defined, will be brought ashore.
Offshore Export Cable(s)	The cable(s) that transmits electricity produced by the WTGs to landfall.
Offshore Export Cable Corridor (OECC)	The area within which the Offshore Export Cable(s) will be located.
Offshore Site	The area encompassing the PFOWF Array Area and OECC, as defined.
Onshore Site	The area encompassing the PFOWF Onshore Transmission Infrastructure, as defined.
Pentland Floating Offshore Wind Farm (PFOWF) Array and Offshore Export Cable(s) (the 'Offshore Development')	All offshore components of the Project (WTGs, inter-array and Offshore Export Cable(s), floating substructures, and all other associated offshore infrastructure) required during operation of the Project, for which HWL are seeking consent. The Offshore Development is the focus of this Environmental Impact Assessment Report.
PFOWF Array	All WTGs, inter-array cables, mooring lines, floating sub-structures and supporting subsea infrastructure within the PFOWF Array Area, as defined, excluding the Offshore Export Cable(s).
PFOWF Array Area	The area where the WTGs will be located within the Offshore Site, as defined.
PFOWF Onshore Transmission Infrastructure (the 'Onshore Development')	All onshore components of the Project, including horizontal directional drilling, onshore cables (i.e. those above mean low water springs), transition joint bay, cable joint bays, substation, construction compound, and access (and all other associated infrastructure) across all project phases from development to decommissioning, for which HWL are seeking consent from The Highland Council.
PFOWF Project (the 'Project')	The combined Offshore Development and Onshore Development, as defined.

ACRONYMS AND ABBREVIATIONS

EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
HWL	Highland Wind Limited
MS	Marine Scotland
MS-LOT	Marine Scotland Licensing Operations Team
Offshore EIAR	Offshore Environmental Impact Assessment Report
PAC	Pre-application Consultation
RNLI	Royal National Lifeboat Institution
THC	The Highland Council

4 STAKEHOLDER ENGAGEMENT

4.1 Introduction

Best practice in Environmental Impact Assessment (EIA) encourages consultation and engagement with stakeholders early in the project development process, with advice and input sought from key consultees early on to inform decisions about the proposed developments.

This chapter describes the stakeholder engagement process undertaken by Highland Wind Limited (HWL) for the Offshore Development to determine the scope of this Offshore Environmental Impact Assessment Report (Offshore EIAR) as well as the consultations that were undertaken to inform the local community of the Offshore Development. Further information on the public consultations can be found in the Pre-application Consultation (PAC) Report accompanying the application to Marine Scotland (MS).

4.2 Stakeholder Engagement

HWL are committed to a robust and effective stakeholder engagement process with respect to the Offshore Development. As such, HWL have undertaken stakeholder engagement since the early stages of the Project and continued this engagement throughout the EIA process.

Consultations with technical stakeholders have occurred predominantly on a topic basis, and HWL have sought advice from key stakeholders, such as MS and NatureScot, on how to address potential impacts on receptors (e.g. Ornithology). Broader engagement on the Offshore Development has also occurred via meetings with MS.

Specific consultation responses for each receptor topic are presented and discussed in the relevant technical assessment chapters within this Offshore EIAR (Chapters 7 to 21).

Consultations with other key stakeholders, such as members of the public and local community councils, have focused on providing general information about the Offshore Development. Key areas of focus have included construction and operational timeframes, how the Offshore Development may affect local communities, and how the Offshore Development may look.

4.2.1 Consultation with Statutory and Non-Statutory Consultees

HWL have aimed to work with all stakeholders (organisations, individuals, and communities) that have an interest in the Offshore Development, whether because of their activities or their location. This will enable the Offshore Development to benefit from stakeholders' experience and expertise and to progress with the involvement of the stakeholders who could ultimately be affected by the Offshore Development.

In addition to bi-weekly discussions with the regulator (Marine Scotland Licensing Operations Team [MS-LOT] on behalf of Scottish Ministers), HWL held meetings with a host of statutory and non-statutory consultees throughout the EIA process. These meetings were used to inform consultees of progress with the Offshore Development, to enable any potential issues or concerns raised by the consultees to be discussed and addressed, and to ensure the assessment process was transparent and robust. Consultations have taken place through a number of channels, including emails, online exhibitions, online meetings, and in-person meetings. Engagement with specific consultees is detailed in Table 4.1.

Consultees informed of the Offshore Development through Project briefing letters are listed in Table 4.2.

Table 4.1 Offshore Development consultations with statutory and non-statutory consultees

Consultee	Topic Discussed	Meetings	Emails	Meeting Dates
Statutory Consultees				
The Highland Council	Project - General	X	X	31st March 2022 23rd February 2022 29th October 2021 24th March 2021 9th November 2020 18th August 2020
	Seascape, Landscape, Visual Amenity	X	X	23rd September 2021 28th July 2021
	Marine Archaeology and Cultural Heritage	-	X	-
	Turbine Noise	-	X	-
Orkney Islands Council	Seascape, Landscape, Visual Amenity	-	X	-
NatureScot	Seascape, Landscape, Visual Amenity	X	X	29th November 2021
	Marine Ornithology	X	X	21st February 2022 16th December 2021 4th November 2021 24th March 2021 4th June 2020
	Marine Physical Processes	-	X	10th January 2022
Northern Lighthouse Board	Shipping and Navigation	X	X	25th November 2021 21st September 2021
	Project - General	X	X	5th August 2021
Historic Environment Scotland	Marine Archaeology and Cultural Heritage	-	X	-
Scottish Environment Protection Agency	Project – General: Survey Works	X	X	28th January 2022 18th May 2021
Non- Statutory Consultees				
Marine Scotland Science	Marine Physical Processes	-	X	-
	Marine Ornithology	X	X	21st February 2022 16th December 2021

Consultee	Topic Discussed	Meetings	Emails	Meeting Dates
				4th November 2021 4th June 2020
Marine Scotland Planning and Policy	Marine Ornithology	X	X	21st February 2022 16th December 2021 4th November 2021 4th June 2020
Royal Society for the Protection of Birds Scotland	Marine Ornithology	X	X	21st February 2022 16th December 2021 4th November 2021 24th March 2021 4th June 2020
Scottish Fishermen's Federation	Commercial Fisheries	X	X	28th July 2022 25th October 2021 6th July 2021 23rd September 2020
North & East Coast Regional Inshore Fishery Group	Commercial Fisheries	-	X	-
Ministry of Defence	Project – General	-	X	-
Maritime Coastguard Agency	Shipping and Navigation	X	-	14th January 2022 25th November 2021 6th September 2021 1st October 2020
Cruising Association	Shipping and Navigation	X	-	30th September 2021
Royal Yachting Association Scotland	Shipping and Navigation	X	-	25th November 2021 22nd September 2021
UK Chamber of Shipping	Shipping and Navigation	X	-	25th November 2021 27th September 2021
Orkney Harbour Authority	Shipping and Navigation	X	-	12th April 2022 25th November 2021
Highlands and Islands Airports Ltd	Aviation and Radar	X	-	-
Melvich Community Council	Project – General	X	X	3rd June 2021
Caithness West Community Council	Project – General	X	X	1st November 2021
Dounreay Site Restoration Ltd	Project – General	X	-	-

Consultee	Topic Discussed	Meetings	Emails	Meeting Dates
Dounreay Stakeholder Group	Project – General	X	X	21st July 2021
Thurso Community Development Trust	Project – General	X	X	2nd November 2021
Thurso Community Sports Hub	Shipping and Navigation	-	X	-
Caithness Sports Council	Shipping and Navigation	-	X	-
Local Fishermen	Commercial Fisheries	X	X	25th November 2021 1st November 2021
Fisheries Management Scotland	Commercial Fisheries	-	X	-
Scottish White Fish Producers Association	Commercial Fisheries	X	X	25th October 2021
Orkney Fisheries Association	Shipping and Navigation	X	X	25th November 2021
	Commercial Fisheries	X	X	28th July 2022 25th November 2021 25th October 2021
Orkney Trout Fishing Association	Fish and Shellfish Ecology	-	X	-
Scrabster and Wick Harbour Authorities	Shipping and Navigation	X	-	25th November 2021 26th October 2021 7th October 2021 23rd September 2020
Pentland Firth Yacht Club	Shipping and Navigation	X	-	25th November 2021
Pentland Canoe Club	Shipping and Navigation	X	-	20th May 2022
Royal National Lifeboat Institution (RNLI) (Lochinver & Thurso)	Shipping and Navigation	X	-	25th November 2021

In addition to the meetings outlined above, HWL have had ongoing and regular contact with landowners, tenant farmers, neighbouring property owners, and occupiers (including Dounreay Site Restoration Ltd and Scottish and Southern Energy) as well as other interested parties. This engagement will continue throughout the life-cycle of the Offshore Development.

Ongoing consultations, including discussions relating to specific environmental receptor assessment methodologies, have been undertaken by the relevant technical specialists throughout the EIA process. Further details of these consultations and how consultee comments have been addressed within the EIA are provided in the relevant technical assessment chapters of this Offshore EIAR (Chapters 7 to 21).

4.2.2 Pre-Application Advice

A meeting with The Highland Council (THC) was held on 9th September 2020 to receive Major Pre-application Advice prior to the submission of the Scoping Report to MS. In terms of consultees with interest in the Offshore Development, representatives from MS, NatureScot, THC, and Scottish Environment Protection Agency were present at this meeting. The meeting objectives were to receive early indications of key stakeholders' views of the Project, clarify information needed for subsequent applications, and help improve the overall quality of the proposal.

This information was formally provided to HWL through a Pre-application Advice Pack from the consultees received on 7th October 2020. Responses contained within the Pre-application Advice Pack have been used to inform topic-specific considerations contained within this document and are summarised, as relevant, in the technical assessment chapters of this Offshore EIAR (Chapters 7 to 21).

4.2.3 Scoping

Scoping is a key phase of the EIA process. Among other things, it provides an opportunity for a developer and decision-maker to identify the potentially significant environmental effects that should be considered for further assessment in an Environmental Impact Assessment Report (EIAR). A developer may request a Scoping Opinion from Scottish Ministers (supported by a Scoping Report) on the information to be supplied in the EIA. This provision provides clarity on what Scottish Ministers are likely to consider as the potentially significant effects of a development and the topics on which an EIAR should focus.

HWL submitted a scoping request for the Project to MS-LOT in December 2020 (HWL, 2020). Subsequently, a Scoping Opinion was received from MS-LOT in September 2021 (MS-LOT, 2021), which detailed comments from Scottish Ministers and consultees on the scope of the EIA. Due to changes in the Offshore Development's Design Envelope, and to ensure scoping consultation feedback on the Offshore Development was appropriate, HWL submitted a Scoping Report Addendum to MS in December 2021 (HWL, 2021), which provided information on the revised Offshore Development parameters (see Chapter 3: Site Selection and Alternatives). In line with this Scoping Report Addendum request, a Scoping Opinion 'Addendum' was received from MS-LOT in May 2022 (MS-LOT, 2022).

The Offshore Development's scoping process is discussed in further detail in Chapter 6: EIA Methodology. The comments that have been received and are applicable to specific receptors are further detailed in the relevant technical assessment chapters within this Offshore EIAR (Chapters 7 to 21).

Additional and ongoing consultations with consultees that have occurred throughout the EIA process, in relation to each receptor assessed, are also detailed within the specific technical assessment chapter to which the consultations relate.

The scoping request and Scoping Opinion concerned the Offshore Development and Onshore Development. The current intent is to seek consents separately for these components from MS (Offshore Development) and THC (Onshore Development). As such, only opinions that relate to the Offshore Development are included within this Offshore EIAR.

4.3 Public Consultation

A summary of the public consultations undertaken is provided below. Full details are available in the PAC Report which accompanies the Marine Licence(s) application.

4.3.1 Pre-Application Consultation

Section 7 of the Marine Licensing (Pre-application Consultation) (Scotland) Regulations 2013 requires that at least one PAC event is carried out to allow members of the public to provide comments to an applicant on a proposed licensable marine activity.

Sections 22 to 24 of the Marine (Scotland) Act 2010 also requires a PAC to be undertaken for developments in Scottish territorial waters that are of a certain scale or involve particular works with the potential for significant impact on the environment and local communities.

The PAC process provides opportunities to receive feedback from the public that can then be addressed in the application and supporting EIAR.

Due to the COVID-19 pandemic, and in line with the Marine Works and Marine Licensing (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020 and The Electricity Works (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020, which make temporary modifications to the Marine Licensing (Pre-application Consultation) (Scotland) Regulations 2013 and the EIA Regulations, the usual requirements placed on developers to hold an in-person PAC event were suspended with replaced a requirement to hold an online virtual event.

As such, the first PAC event, occurring during the COVID-19 pandemic, was held through an online virtual public exhibition. A second PAC event was held in person, and supplemented with an online virtual exhibition, to gain feedback from local communities and stakeholders and outline how feedback received by HWL during the consultation process was being considered. These events are summarised below. Full details on the PAC events, compliance with the PAC regulations, and feedback received are provided within the PAC Report.

4.3.1.1 Public event 1

The first virtual exhibition was opened on 27th September 2021 and closed on 31st October 2021. On 5th October 2021, a live chat function was opened within the exhibition to provide the public with an opportunity to communicate directly with the project team. A series of exhibition boards were displayed at the event to introduce the Project and explain the proposal.

Overall, there was a high level of engagement during the first PAC event, highlighting the effectiveness of the consultation, given that an in-person event was unable to take place due to the COVID-19 pandemic. The feedback received during this event was obtained through a variety of mechanisms, with the public indicating they were interested in receiving further information on a range of topics, including, notably, visual impacts of the Offshore Development.

A copy of the event materials along with HWL's responses to the feedback received and event statistics are provided within the PAC Report.

4.3.1.2 Public event 2

HWL carried out a second PAC event to provide updated information on the Project and the refined design specifications for the Offshore Development and invite feedback from the members of the public in attending in person and online. The event occurred on 11th and 12th May 2022 at two local venues in Reay and Thurso.

In addition, a second online virtual exhibition went live on the project website on 9th May 2022; the consultation period closed on 20th May 2022. On 18th May 2022, a live chat function was opened within the exhibition to provide the public with an opportunity to communicate directly with the project team.

A series of exhibition boards were on display at the in-person event and the virtual exhibition. In response to feedback received at the first PAC event, the exhibition boards provided an update on the visual impact assessment for the Offshore Development, including the provision of photomontages and wirelines from specific viewpoints. A copy of the event materials is included in the accompanying PAC Report.

Overall, the second PAC event had a good level of engagement with members of the local community, local councillors, fishermen, and others in attendance.

A copy of the event materials along with HWL's responses to feedback received on the Offshore Development and event statistics are provided within the PAC Report.

4.3.1.3 Pre-submission project information update

An online pre-submission project information update was launched on 4th July 2022 through a virtual exhibition space. The information update explained changes to the Offshore Development's footprint and the reduction in the number of Wind Turbine Generators being considered as part of the application. These changes were made based on feedback from the second PAC event and the Scoping Opinion responses. Stakeholders were notified of the information update through email, and flyers were sent to community organisations for distribution. Stakeholders were able to contact the project team by email if they had questions or to request further information.

4.4 Additional Consultation Methods

4.4.1 Local Community Meetings

HWL have held meetings with local community councils and other local community groups in the vicinity of the Offshore Development. These meetings ensure that local communities are aware of the Offshore Development whilst also providing another avenue for local residents to provide feedback. The following community councils and local groups have met with HWL:

- > Melvich Community Council;
- > Caithness West Community Council;
- > Thurso Community Development Trust; and
- > Dounreay Stakeholders Group.

4.4.2 Project Briefing Letters

Although not a statutory requirement, to inform relevant stakeholders of the Project, two separate briefing letters were distributed to the consultee list set out in Table 4.2 on 10th September 2020 and 27th November 2020, in advance of submission of the Pentland Floating Offshore Wind Farm Scoping Report (HWL, 2020).

The briefing letters provided an opportunity to inform and engage stakeholders on the Project at an early stage whilst also giving stakeholders a chance to provide feedback or request a meeting to discuss the Project further. Copies of the briefing letters are presented within the PAC Report.

Table 4.2 Project briefing letter stakeholder distribution list

Distribution List	
Bettyhill, Strathnaver and Altnaharra Community Council	Oil and Pipelines Agency
Birsay Community Council	Orkney Ferries
Brims Tidal Array (now in liquidation)	Orkney Fisheries Association
British Telecom	Orkney Island Council
Caithness District Salmon Fishery Board	Orkney Island Council Marine Services
Caithness West Community Council	Orkney Island Sea Angling Association
Castletown Community Council	Orkney Sailing Club
Chamber of Shipping	Pentland Canoe Club
Civil Aviation Authority	Pentland Firth Yacht Club
Community Inshore Fisheries Alliance	Reay Golf Course
Crown Estate Scotland	Royal National Lifeboat Institution (RNLI Lochinver)

Distribution List	
Defence Infrastructure Organisation	Royal National Lifeboat Institution (RNLI Thurso)
Dounreay Site Restoration Limited	Royal Society for the Protection of Birds Scotland
Dounreay Stakeholder Working Group	Royal Yachting Association Scotland
Dunnet and Canisbay Community Council	Scottish Creel Fishermen's Federation
Durness Community Council	Scottish Environmental Protection Agency
Durness Development Group	Scottish Fishermen's Federation
Fisheries Management Scotland	Scottish Government - Planning & Architecture Division
Graemsay, Hoy and Walls Community Council	Scottish Pelagic Fishermen's Association
Harray and Sandwick Community Council	Scottish Sea Farms
Highlands and Islands Airports	Scottish Sub Aqua Club
Highlands and Islands Enterprise	Scottish Water
Historic Environment Scotland	Scottish Wildlife Trust
Joint Nature Conservation Committee	Scrabster Fishery Office
Joint Radio Company	Scrabster Harbour Trust
Landowners (Various)	Seafish
Maritime and Coastguard Agency	South Ronaldsay and Burray Community Council
Marine Scotland – Licensing Operations Team	Sport Scotland
Marine Scotland – Marine Planning and Policy	SSE Transmission
Marine Scotland Science	Strathy and Armadale Community Council
Melvich Community Council	Stromness Community Council
MeyGen	The Highland Council
National Air Traffic Services	Thurso Community Council
National Grid	Tongue Community Council
National Inshore Fishery Groups	Transport Scotland
NatureScot	UK Hydrographic Office
Northern District Salmon Fishery Board	VisitScotland
Northern Lighthouse Board	Vulcan Naval Reactor Test Establishment
Nuclear Decommissioning Authority	Whale & Dolphin Conservation
Oil & Gas UK	Wick Harbour Authority

4.4.2.1 *Project website*

In addition to the consultation methods discussed above, HWL have designed and maintain a website dedicated to the Project: www.pentlandfloatingwind.com. This website provides up-to-date information on the progress of the Offshore Development along with information on how the public can contact the project team.

4.5 Summary and Conclusions

Regarding stakeholder engagement for the Project, HWL's overarching aim has been to ensure the efficient development of an environmentally and socially responsible offshore wind farm that benefits the local community. The engagement approach has focused on targeted consultations, supported by clear objectives, to avoid unnecessarily burdening stakeholders.

During the planning process for the Offshore Development works, the project team has gone above and beyond the statutory consultation requirements by consulting with relevant statutory and non-statutory consultees as well as local residents and other interested stakeholders. This robust consultation process has resulted in a number of recommendations regarding the design of the Offshore Development, which have now been accounted for in the Design Envelope (see Chapter 3: Site Selection and Alternatives) and community benefits. The process also allowed HWL to provide information on specialist topics such as agreed methodologies for receptor-specific impact assessments. The feedback received has also been useful to guide the mitigation measures proposed. Furthermore, the consultation events have proved to be a good opportunity to initiate dialogue and build relationships with key individuals and groups. A number of key stakeholders have attended more than one consultation event, which has also helped to build trust and develop relationships.

4.6 References

Highland Wind Ltd (HWL) (2020). Request for Scoping Opinion. Pentland Floating Offshore Wind Farm EIA Scoping Report. A-100671-S00-REPT-001. 16 December 2020. <https://marine.gov.scot/data/scoping-request-pentland-floating-offshore-wind-farm> [Accessed 12/01/2022].

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Marine Scotland Licencing Operations Team (MS-LOT) (2021). Scoping Opinion adopted by the Scottish Ministers under: The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 Pentland Floating Offshore Wind Farm. 28 September 2021. https://marine.gov.scot/sites/default/files/pfowf_scoping_opinion.pdf [Accessed 12/01/2022].

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