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Volume 7E Proposed Development (Onshore) Appendices

Appendix 6-5 Consultation Summary

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Volume 7E Appendix 6-5 Consultation Summary

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Acronyms and Abbreviations

AEP	Annual Exceedance Probability
AMSC	Approval of Matters Specified in Consent
CEMP	Construction Environmental Management Plan
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EMP	Environmental Management Plan
FRA	Flood Risk Assessment
FRCP	Flood Risk and Costal Protection
GWDTE	Ground Water Dependent Terrestrial Ecosystems
HDD	Horizontal Directional Drilling
NPF4	National Planning Framework 4
NVC	National Vegetation Classification
ONEC	Onshore Export Cable Corridor
OnTI	Onshore Transmission Infrastructure
PPP	Planning Permission in Principle
PWS	Private Water Supplies
RLB	Red Line Boundary
SEPA	Scottish Environment Protection Agency
SuDS	Sustainable Urban Drainage System

1 Stakeholder Engagement

1.1 Overview

1.1.1.1 The Scoping Report was submitted to Aberdeenshire Council in December 2022 who then circulated the report to relevant consultees. A Scoping Opinion was received from Aberdeenshire Council on 1 February 2023. Relevant comments from the Scoping Opinion specific to the water environment are provided in Table 1-1.

1.1.1.2 The Scottish Environment Protection Agency (SEPA) Scoping response contained a number of requirements that necessitated the availability of a detailed design for the Onshore Transmission Infrastructure (OnTI). As Caledonia Offshore Wind Farm Limited (the Applicant) is seeking Planning Permission in Principle (PPP) for the OnTI, further consultation was required to agree how these requirements might be met in the absence of the necessary design information. A technical note was submitted to SEPA on 4 September 2023 outlining the responses and suggestions in the Scoping Response.

1.1.1.3 A SEPA Senior Planning Officer responded on 1 November 2023 to key points relating to peat and flood risk. A further technical note (issued 28 November 2023) was prepared to clarify the intended approach following this further information from SEPA (dated 1 November 2023), summarised in Table 1-2. The technical note also provided a response to Aberdeenshire Council's comments within their Scoping Opinion, presented in Table 1-1.

Table 1-1: Scoping Opinion Response

Consultee	Comment	Response
Aberdeenshire Council	Detailed survey work would be required to inform the Environmental Impact Assessment Report (EIAR). 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.	Hydrological walkover surveys to assess the general hydrological condition of the site, characterise key watercourses and assess watercourse crossing locations, evaluation of upstream and downstream habitats, and review of land around the Onshore Substation Site for the suitability/potential of ground water dependent terrestrial ecosystems were conducted and have informed Volume 5, Chapter 6: Hydrology and Hydrogeology.
Aberdeenshire Council	"Examples of the types of issues that should be addressed include: Hydrology and Water Supplies; Proposed Mitigation Measures"	Hydrology and water supplies have been addressed in Volume 5, Chapter 6: Hydrology and Hydrogeology and supporting appendices. The baseline hydrological environment is discussed in Section 6.4 of Volume 5, Chapter 6: Hydrology and Hydrogeology. Assessment of effects in Section 6.7 of Volume 5, Chapter 6: Hydrology and Hydrogeology, with mitigation measures and monitoring discussed in Section 6.10 of

Consultee	Comment	Response
		Volume 5, Chapter 6: Hydrology and Hydrogeology. A summary of effects after the application of mitigation is presented in Table 6-15 of Volume 5, Chapter 6: Hydrology and Hydrogeology.
Aberdeenshire Council Flood Risk and Coastal Protection Service	The Council's Flood Risk and Coastal Protection (FRCP) Service commented that section 10.6.3.3 refers to permanent watercourse diversions and noted that these should be avoided, and the works designed to avoid the need for any permanent diversions where possible.	This is noted. Permanent watercourse diversions are to be avoided wherever possible.
Aberdeenshire Council	Culverting of watercourses should be kept to the minimum length required to provide access and not used for land gain.	This is noted. Culvert lengths for access tracks will be kept to a minimum and not used for land gain.
Aberdeenshire Council	Watercourse methods should be designed in accordance with SEPAs publication 'Engineering in the water environment: good practice guide River Crossings.'	This publication will be used to inform watercourse crossing methodology.
Aberdeenshire Council Flood Risk and Coastal Protection Service	The FRCP Service confirmed that a Drainage Impact Assessment would be required at the planning application stage for the Onshore	A drainage impact assessment for the Onshore Substations and SuDS accompanies

Consultee	Comment	Response
	Substation and Sustainable Drainage System (SuDS) should be applied.	the planning application and is provided in Application Document 6.
Aberdeenshire Council	Section 10.5.4.7 refers to consulting with SEPA on the scope of any Flood Risk Assessment required and the FRCP Service would request to be similarly consulted.	The information required to inform a detailed Flood Risk Assessment (FRA) will not be available to support the PPP and as a result one will not accompany the submission. In the absence of an FRA to support the PPP application, potential effects upon flood risk to and from the Proposed Development (Onshore) are reported on within the Volume 5, Chapter 6: Hydrology and Hydrogeology. Should an FRA be required for the Approval of Matters Specified in Conditions (AMSC) application Aberdeenshire Council and SEPA will be consulted on the scope.
Aberdeenshire Council	The scoping in of private water supplies is welcomed. Avoidance of PWS should be the first principle, otherwise Horizontal Directional Drilling (HDD) may be a suitable mitigation tactic.	This is noted. Potential impacts to Private Water Supplies (PWS) are discussed in Section 6.7 of Volume 5, Chapter 6: Hydrology and Hydrogeology, and Volume 7E, Appendix 6-3: Private Water Supply Assessment. Embedded mitigation through avoidance is outlined in Section 6.5.6 of Volume 5, Chapter 6: Hydrology and Hydrogeology. Any required secondary mitigation is summarised in Section 6.10 of

Consultee	Comment	Response
		Volume 5, Chapter 6: Hydrology and Hydrogeology.
Aberdeenshire Council	The EIAR should be accompanied by a draft Construction Method Statement including an Environmental Management Plan (EMP), Water Management Plan and Surface Water Management Plan. A private water supply risk assessment and decommission plan should also be contained as an appendix to the EMP.	This is noted. An Outline Construction Environmental Management Plan (CEMP) is included with the PPP application. This includes mitigation for the water environment and high-level principles for decommissioning. Volume 7E, Appendix 6-3: Private Water Supply Assessment provides a PWS assessment.
Aberdeenshire Council	Regarding the questions to consultees in section 10.12; a) Do you agree that receptors and potential impacts that have been identified for hydrology? Yes, as far as related to our specific interests. b) Do you agree with the potential impacts that have been scoped out of the Environmental Impact Assessment (EIA) for hydrology? It is unclear what impacts if any have been scoped out in regard to hydrology, can you please clarify what has been scoped out? c) Do you agree with the proposed approach to the assessment? We are not familiar enough	a) Noted. b) No potential impacts have been scoped out of assessment at this stage. Potential impacts scoped into the assessment during construction (temporary) and operation (permanent) include: Impacts of increased pollution; Impacts of increase in hardstanding and introduction of new watercourse crossings on flood risk; Impacts of change to hydromorphological and ecological quality of water quality;

Consultee	Comment	Response
	with the assessment method stated to comment on that, but the wider approach seems appropriate.	Impacts to local land drainage structures; Impacts to catchments and pathways for surface water and groundwater receptors; Impacts to abstraction and private water supplies; Impacts on local hydrogeology and groundwater resources; and Impacts to Groundwater Dependent Terrestrial Ecosystems (GDWTE) due to dewatering effects. c) Noted
SEPA	SEPA noted that the following key issues should be addressed in a formal application: Minimising impacts on peat and peatland; Avoiding good quality or rare GWDTE habitats and minimising impacts on other GWDTE habitats; and Avoiding impacts on watercourses and other water features by ensuring suitable buffers and using best practice design crossings.	The Proposed Development (Onshore) is undertaking design refinement and is considering technical and environmental constraints including the need to minimise impact on peat and peatland and GWDTE habitats where identified. Refer to Volume 5, Chapter 7: Geology, Soils and Contaminated Land for further information in regards the approach to peatland impacts.

Consultee	Comment	Response
	Outlining the re-use of timber that is not considered merchantable. Please refer to Section in the Appendix in Scoping Response.	An assessment of GWDTE has been undertaken based on habitat mapping and following SEPA guidance. Volume 7E, Appendix 6-2: Groundwater-Dependent Terrestrial Ecosystems Assessment provides a desk-based assessment of each potential GWDTEs using the Phase 1 habitat survey and resulting NVC survey results. The assessment reviews information on topography, drainage, geology and hydrogeology to determine the likelihood of the habitats being truly groundwater dependant. National Vegetation Classification (NVC) surveys have been completed in two locations within the OnTI RLB. The area near the Onshore Substation Sites was highlighted during Phase 1 habitat surveys as having potential to support GWDTE. The rest of the Onshore Cable Corridor (ONEC) has not been subject to NVC surveys due no potential priority or sensitive habitats being identified during the Phase 1 habitat surveys. Details of micro-siting and mitigation will be committed to within the PPP and identified at detailed design stage. Volume 7E, Appendix 6-4: Watercourse Crossing Inventory confirms watercourses

Consultee	Comment	Response
		with the potential to be crossed and the likely crossing methods, which will follow SEPA guidelines. Refer to Volume 5, Chapter 2: Land Use in regards the approach of the Proposed Development (Onshore) to potential impacts on land use including woodland.
SEPA	Proposed engineering works within the water environment will require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended). Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Details of regulatory requirements and good practice advice, for example in relation to private drainage, can be found on the regulations section of our [SEPA] website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team at: gs@sepa.org.uk	Noted. Works will be undertaken in line with these regulations. Relevant documentation and associated permissions/licences will be submitted and secured at AMSC stage.

Consultee	Comment	Response
SEPA	Site layout 1.1 All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.	We recognise the requirement for detailed maps and design layout. We would note that the exact locations for access tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements will be determined at the detailed design stage once PPP has been granted and the required site investigations undertaken. Volume 7E, Appendix 6-6 Hydrology and Hydrogeology Figures show the OnTI Red Line Boundary (RLB) in relation to water environment features and constraints with the appropriate buffers applied. The location of the Onshore Substation Site is identified and associated permanent access arrangements.
SEPA	Engineering activities which may have adverse effects on the water environment The site layout must be designed to avoid impacts upon the water environment. Where	We recognise the requirement to avoid impacts on the water environment were possible. The Proposed Development

Consultee	Comment	Response
	activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing: All proposed temporary or permanent infrastructure overlain with all lochs and watercourses. A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds. If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.	(Onshore) will require watercourse crossings to facilitate the OnTI. Volume 7E, Appendix 6-4: Watercourse Crossing Inventory confirms those watercourses with the potential to be crossed and the likely crossing methods, which will follow SEPA guidelines. Detailed information on the required engineering works and potential mitigation plans will not be available until the detailed design stage once PPP has been granted and the required site investigations undertaken. Commitments are made within Volume 5, Chapter 6: Hydrology and Hydrogeology regarding the appropriate undertaking of abstraction and dewatering activities in line with SEPA guidance. No detailed FRA will be undertaken in support of the PPP application. Within Volume 5, Chapter 6: Hydrology and Hydrogeology, a desk-based source-pathway-receptor assessment (informed by a site visit) has been undertaken investigating potential flood risk to third party land downstream of the Onshore Substation Site, and to the site itself.

Consultee	Comment	Response
	Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide. Refer to Appendix 2 of our Standing Advice for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor, then a Flood Risk Assessment must be submitted in support of the planning application. Our Technical flood risk guidance for stakeholders outlines the information we require to be submitted as part of a Flood Risk Assessment. Please also refer to CAR Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities.	
SEPA	Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE) GWDTE are protected under the Water Framework Directive and therefore the layout	Noted. An assessment of GWDTE has been undertaken based on habitat mapping and following SEPA guidance. Volume 7E, Appendix 6-2: Groundwater Dependent Terrestrial Ecosystems Assessment provides

Consultee	Comment	Response
	and design of the development must avoid impact on such areas. The following information must be included in the submission: A map demonstrating that all GWDTE are outwit a 100m radius of all excavations shallower than 1m and outwit 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it; and If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected. Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice and the minimum information we require to be submitted.	a desk-based assessment of each potential GWDTEs. This reviews information on topography, drainage, geology and hydrogeology to determine the likelihood of the habitats being truly groundwater dependant. NVC surveys have been completed in two areas within the OnTI RLB. The rest of the ONEC has not been subject to NVC surveys. The area near the Onshore Substation sites were highlighted during Phase 1 habitat surveys as having potential to support GWDTE. Details of micro-siting and mitigation will be committed to within the PPP and identified at detailed design stage.

Consultee	Comment	Response
SEPA	Existing groundwater abstractions Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include: A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it; and If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected. Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater	Noted. Volume 7E, Appendix 6-3: Private Water Supply Assessment provides a desk-based assessment of PWS using data requests to Aberdeenshire Council and the baseline within Volume 5, Chapter 6: Hydrology and Hydrogeology captures existing abstractions using data requests to the council and publicly available information. Any detailed risk assessment work including micro-sitting will be undertaken as part of the detailed design of the OnTI once the likely Onshore Export Cable Route is identified.

Consultee	Comment	Response
	Dependent Terrestrial Ecosystems for further advice on the minimum information we require to be submitted.	
SEPA	Pollution prevention and environmental management One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. A schedule of mitigation supported by the above site-specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of Ecological Clerk of Works, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to Guidance for Pollution Prevention.	We recognise the requirements around pollution prevention and environmental management, a schedule of best practice and mitigation commitments for the OnTI is provided within the outline CEMP.
SEPA	Life extension, repowering and decommissioning Proposals for life extension, repowering and/or decommissioning must demonstrate accordance	In the event of decommissioning, it is likely that all underground equipment and the Onshore Substations foundations will remain in-situ. Above ground equipment at the

Consultee	Comment	Response
	with SEPA Guidance on the life extension and decommissioning of onshore wind farms. Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long-term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed. The submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing. Further guidance on this may be found in the document 'Is it waste - Understanding the definition of waste'.	Onshore Substation Site will be cleared and the site reinstated. It is considered that the environmental effects of this approach to decommissioning will be less than those arising from the breakup and removal of infrastructure. The most appropriate method of decommissioning and the handling and disposal of materials will be undertaken in agreement with the relevant authorities at the time. Any applicable new legislation or guidelines published prior to decommissioning will be taken into account in relation to any design of mitigation prior to decommissioning occurring.

1.1.1.4 Further consultation has been undertaken throughout the pre-application stage. Table 1-2 summarises the consultation activities carried out relevant to the assessment of hydrology and hydrogeology.

Table 1-2: Additional Consultation Activities

Date	Consultee and Type of Consultation	Summary
01/10/2023	SEPA	As a minimum we would expect peat probing to be undertaken at all possible substation sites in order for the 'worst case scenario' to be presented. Only in this way can any estimate of peat volumes and the assessment of impact on peat and carbon balance be undertaken and demonstrate whether the project will comply with NPF4 Policy 5. The EIAR will need to demonstrate, should any peat be excavated, how the proposal will comply with Policy 5 in terms of peat re-use. Peat volumes need to be established in order to identify how much peat needs to be considered in terms of re-use with areas of on or off-site re-use being identified. We would expect demonstration that peat re-use/restoration is achievable, i.e. landowner agreements for long term management of the peat will be possible. Response to comments: The requirement for peat probing as a minimum at the substation sites is noted. A peatland survey has been undertaken in accordance with the initial assessment methodology identified within the Scottish Government, Scottish Natural Heritage (now NatureScot) and SEPA Guidance on areas potentially subject to disturbance at the identified substation sites where the NatureScot Carbon and peatland 2016 map identifies peatland. This survey has been used to inform the Proposed Development (Onshore) design refinement. The Proposed Development (Onshore) has now selected a preferred substation site and has avoided interaction with areas of peatland. No further surveys are therefore required. Where the OnTI cable corridor interacts with areas identified as potential peatland within the NatureScot Carbon and peatland 2016 map, the Proposed Development (Onshore) has reviewed these areas and where possible has looked to avoid encompassing them within the cable corridor. Where the potential for interaction with these areas exists, the Proposed Development (Onshore) will

Date	Consultee and Type of Consultation	Summary
		undertake peat probing and hand-held coring to confirm the presence and quality of peatland and/or carbon-rich soils within the corridor, to inform the EIAR and detailed design.
01/10/23	SEPA	In terms of flood risk, there would have to be a condition attached to any PPP specifying no landraising or storage of materials including topsoil/subsoil for the whole cable length and substation areas in areas shown on SEPA Future Flood Maps as a minimum if no detailed FRA was undertaken at this stage Response to comments: It is noted that a condition may be added to the PPP to specify no land raising or storage of materials including topsoil/subsoil for the whole cable length and substation areas in areas shown on SEPA Future Flood Maps. The information required to inform a detailed FRA will not be available to support the PPP, due the width of the corridor (100m) and the indicative layout of other infrastructure components (OnTI). As a result, a detailed FRA will not be undertaken to accompany the PPP. Should there be any encroachment of permanent infrastructure (including land raising) with the medium risk (0.5% Annual Exceedance Probability' (AEP) for surface water, coastal and river flood risk) flooding areas an FRA will be conducted at detailed design to support the AMSC. Storage of materials including topsoil/subsoil for the whole cable length and substation areas will be located outside of areas shown as being at medium risk on SEPA flood risk mapping. This mitigation will be within the Outline CEMP for the Proposed Development (Onshore). In the absence of an FRA to support the PPP, potential effects upon flood risk to and from the Proposed Development (Onshore) will be reported on within the PPP EIAR for the Proposed

Date	Consultee and Type of Consultation	Summary
		Development (Onshore). Mitigation and design principles will be provided in CEMP.
18/4/24	Aberdeenshire Council/SEPA	There appears to be a number of PWS within and immediately adjacent to the cable corridor as well as several springs and wells. Confirmation of whether any of the springs and wells act as a PWS source will also be required. Response to comments: Volume 7E, Appendix 6-3: Private Water Supply Assessment provides a desk-based assessment of PWS using data requests to Aberdeenshire Council and the baseline within Volume 5, Chapter 6: Hydrology and Hydrogeology captures existing abstractions using data requests to the council and publicly available information. Wells and springs have been identified from Ordnance Survey (OS) mapping and accounted for in the baseline and assessment. Any detailed risk assessment work including micro-sitting will be undertaken as part of the detailed design of the OnTI once the Onshore Export Cable Route is identified. This will include the verification of PWS through detailed surveys and landowner/residential questionnaire.
18/4/24	Aberdeenshire Council/SEPA	General excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The EIA submission should include: ▪ A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it; and ▪ If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA will seek conditions securing appropriate

Date	Consultee and Type of Consultation	Summary
		mitigation for all existing groundwater abstractions affected and the detailed risk assessments if they are not provided at the EIA stage. Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice on the minimum information SEPA requires to be submitted. Response to comments: Volume 7E, Appendix 6-3: Private Water Supply Assessment provides a desk-based assessment of PWS and Figure 6-6: Private Water Supplies (Confidential) (in Volume 7E, Appendix 6-3, Annex 1: Private Water Supply Figures (Confidential) presents the locations of PWS and the relevant 100m and 250m buffer. Commitments have been made for further assessment, if necessary, once the Onshore Export Cable Route has been identified at detailed design. Mitigation has been outlined for use in the eventuality that there is an impact to existing abstractions.
18/4/24	Aberdeenshire Council/SEPA	The applicant should be mindful of the requirement for a minimum of 6 months, preferably a year, of monitoring of a PWS pre-construction, should it be determined a PWS will potentially be impacted. Response to comments: This is noted and included in the monitoring set out in Section 6.10.1 of Volume 5, Chapter 6: Hydrology and Hydrogeology.
18/4/24	Aberdeenshire Council/SEPA	The site layout should be designed to minimise watercourse crossings and avoid other direct impacts on water features. There is a presumption against culverting for land gain. Response to comments: This is noted. Permanent watercourse diversions are to be avoided wherever possible and culvert

Date	Consultee and Type of Consultation	Summary
		lengths for access tracks will be kept to a minimum and not used for land gain.
18/4/24	Aberdeenshire Council/SEPA	If not included in the EIAR at this stage, SEPA will request a condition to ensure the submission at the AMSC stage of a map showing: All proposed temporary or permanent infrastructure overlain with all watercourses. A minimum buffer of 15m around each watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the watercourse and drawings of what is proposed in terms of engineering works. Measures should be put in place to protect any downstream sensitive receptors. Response to comments: This is noted and Caledonia Offshore Wind Farm Ltd (the Applicant) will provide the detail requested at AMSC stage as part of detailed design activities. Mitigation outlined in Section 6.5.6 of Volume 5, Chapter 6: Hydrology and Hydrogeology includes measures to protect downstream sensitive receptors, this is also included in the outline CEMP that accompanies the application.
18/4/24	Aberdeenshire Council/SEPA	Where activities such as watercourse crossings are proposed they should follow recognised best practice guidance. Small crossings should be oversized bottomless culverts and larger crossings should be single span bridges demonstrated to convey the 1 in 200 year flood event including an appropriate allowance for climate change. This will be requested by condition.

Date	Consultee and Type of Consultation	Summary
		Further advice and SEPA best practice guidance are available within the water engineering section of its website. Guidance on the design of water crossings can be found in SEPA's Construction of River Crossings Good Practice Guide. Please refer to their Flood Risk Standing Advice for advice on flood risk. Crossings must be designed to accommodate the 0.5% Annual Exceedance Probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures. Response to comments: This is noted, advice will be taken into account at detailed design and all required standards adhered to.

Date	Consultee and Type of Consultation	Summary
18/4/24	Aberdeenshire Council/SEPA	SEPA also highlight the national availability of their Geomorphic Risk Layer from their environmental data webpage. This highlights where a watercourse is predicted to change its course through natural processes of erosion and deposition. It is recommended where proposals will be in the vicinity or cross watercourses where this has been identified that the applicant undertakes a geomorphic assessment of the watercourse in order for the project to be designed in a sustainable way to allow the watercourse to natural change its course in perpetuity and for the development not to be exposed to potential future risk. Relevant watercourses: Burn of Brydock (NJ6651458939 to NJ6788658676); Burn of King Edward (NJ7074457844 to NJ7221756125); Craigston Burn (NJ7288955352 to NJ7341754846); and Burn of Burnside and Burn of Kinminty (south and north of Burnside House at NJ7507952391). Response to comments: This is noted. The Geomorphic Risk Layer has informed the baseline of Volume 5, Chapter 6: Hydrology and Hydrogeology. Detailed design will take it into consideration for any watercourses of relevance are encountered. There are currently no new permanent watercourse crossings of the relevant watercourses proposed in the design.

Date	Consultee and Type of Consultation	Summary
18/4/24	Aberdeenshire Council/SEPA	A schedule of mitigation supported by the above site-specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of Ecological Clerk of Works, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to the Guidance for Pollution Prevention and SEPAs water run-off from construction sites webpage for more information. Response to comments: Volume 7, Appendix 7: Proposed Development (Onshore) Schedule of Mitigation presents a schedule of mitigation that summarises the mitigation outlined within Volume 5, Chapter 6: Hydrology and Hydrogeology. Details are also included in the outline CEMP that accompanies the application, within Volume 7, Appendix 10: Outline Construction Environment Management Plan.
18/4/24	Aberdeenshire Council/SEPA	In relation to the various flood extents as indicated on SEPA's Future Flood Maps through which the preferred proposed cable route passes, SEPA will wish to see it demonstrated that, or the applicant commit to, no land raising (including temporary bunding) or temporary infrastructure will take place/be placed within these areas. They also wish to highlight the relatively wide width of the Burn of Boyndie and River Deveron at the points the proposed route crosses. If land raising or temporary infrastructure are unavoidable in a flood extent, it will need to be demonstrated that the development will not result in an increased risk of flooding to a nearby receptor and an FRA will be required to be submitted at the MSC stage. SEPAs Technical flood risk guidance for stakeholders outlines the information SEPA requires to be

Date	Consultee and Type of Consultation	Summary
		submitted in an FRA. Please also refer to Controlled Activities Regulations Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities Response to comments: Future Flood Maps have been used to establish the baseline for the assessment presented in Volume 5, Chapter 6: Hydrology and Hydrogeology. Flood risk zones are presented on Figure 6-4 and Figure 6-5 within Appendix 6-6: Hydrology and Hydrogeology Figures. As embedded mitigation, the Proposed Development (Onshore) does not propose any permanent above ground infrastructure within a flood zone. Mitigation is outlined within Volume 5, Chapter 6: Hydrology and Hydrogeology and the outline CEMP, in the scenario that construction compounds or activities are required within a flood zone. For example, to facilitate HDD activities. An FRA will be completed at detail design stage if required necessary and submitted through the AMSC process. SEPAs guidance is noted and will be adhered to.
18/4/24	Aberdeenshire Council/SEPA	It is understood that discussions have been underway with our Flood Risk and Coastal Protection team with regards to the scope of a Drainage Impact Assessment which is to be submitted in support of a formal planning application. Confirmation of whether a Flood Risk Assessment will be required still outstanding. Liaison with the Councils FRCP team on this matter is recommended. Response to comments: An Outline Drainage Impact Assessment is presented in Application Document 6.

Date	Consultee and Type of Consultation	Summary
		The information required to inform a detailed FRA is not available to support the PPP. In the absence of an FRA to support the PPP, potential effects upon flood risk to and from the Proposed Development (Onshore) is reported on within Volume 5, Chapter 6: Hydrology and Hydrogeology. Should an FRA be required for the AMSC, Aberdeenshire Council and SEPA will be consulted on the scope.
07/02/24	SEPA	Peat: We note and welcome the substation will no longer require the excavation of peat and confirm no further peat probing information for the substation area will be required if this remains the case. We welcome further peat probing will be undertaken should it be required along the cable route[i]. Flood risk: We note and welcome the commitment to no storage of materials and substation areas to be located outwith the SEPA flood extents. However, we must highlight that the SEPA flood maps have been updated and with the publication of National Planning Framework 4 (NPF4) SEPA Future Flood Maps should be used going forward with this, or any other project within Scotland.

[i] Following this consultation the OnTI RLB was amended in response to feedback received during public exhibitions. As a result of the amendments made, small areas of mapped Class 1, 3 and 5 peat soil are now present in the southern part of the OnTI RLB. Peat probing has been undertaken, which identified that there were no Class 1 peat soils present. An Outline Peat Management Plan (Application Document 7) has been produced in support of this EIAR.

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