

Spittal to Loch Buidhe to Beauly 400 kV
OHL Connection
Environmental Impact Assessment
Volume 5 | Technical Appendix

Appendix 8.7 | Report to Inform Habitat Regulations Appraisal (Inner Moray Firth SPA)

July 2025





Spittal – Loch Buidhe – Beauly 400 kV OHL Connection

Habitats Regulations Appraisal (HRA)
Report to inform Appropriate Assessment
Inner Moray Firth SPA and Ramsar
July 2025





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Figure 1: Location of the Proposed Development in relation to the Inner Moray Firth SPA and Ramsar site



1 INTRODUCTION

- 1.1.1 This report has been produced to inform the Habitats Regulations Appraisal (HRA) process for Scottish and Southern Electricity Networks Transmission ("SSEN Transmission") application for consent to construct and operate the Spittal to Loch Buidhe to Beauly 400 kV Overhead Line (OHL) Connection (Proposed Development). The project description and overview of the HRA process are presented in the HRA Screening Assessment Report (Screening Assessment) (Volume 5, Appendix 8.7). The Screening Assessment presents the HRA Stage 1 Screening Stage assessment of the Proposed Development with respect to its potential to have a Likely Significant Effect (LSE) on European and Ramsar sites of nature conservation importance, either alone or in-combination with other plans or projects.
- 1.1.2 Separate reports have been produced for each European or Ramsar site identified in the HRA Screening Report as requiring further assessment.
- 1.1.3 This report provides information to allow the Competent Authority (i.e. the Scottish Ministers for the Proposed Development) to undertake an HRA Stage 2 Appropriate Assessment (AA) for the Inner Moray Firth SPA and Ramsar site. Inner Moray Firth SPA is 2,290 ha and qualifies¹ under Article 4.1 by regularly supporting populations of European importance of Annex I species including breeding common tern (Sterna hirundo), osprey (Pandion haliaetus) and wintering bar-tailed godwit (Limosa lapponica). The site also qualifies under Article 4.2 by regularly supporting populations of European importance of the migratory species greylag goose (Anser anser), red-breasted merganser (Mergus serrator) and redshank (Tringa lapponica), as well as regularly supporting an assemblage of over 20,000 waterfowl in the non-breeding season.
- 1.1.4 Inner Moray Firth Ramsar site² is 2,339 ha and qualifies under Criterion 1 because the site supports a variety of important wetland habitats including mudflats, sandflats, saltmarsh, sand dunes and shingle bars; Criterion 2 for breeding osprey and common tern; Criterion 4 and 5 for supporting an internationally important assemblage of waterfowl in the non-breeding season including; scaup, curlew, goosander, goldeneye, teal, wigeon, cormorant and oystercatcher (*Haematopus ostralegus*); and Criterion 6 for regularly supporting more than 1 % of the population of bar-tailed godwit, greylag goose, red-breasted merganser and redshank.

¹ NatureScot Site Link - Inner Moray Firth SPA Citation https://www.nature.scot/sites/default/files/special-protection-area/8515/spa-citation.pdf

² NatureScot Site Link – Inner Moray Firth Ramsar Citation https://www.nature.scot/sites/default/files/ramsar-site/8430/ramsar-site-citation.pdf



2 METHODOLOGY

2.1 Introduction

2.1.1 The approach to the HRA has followed that set out in the Conservation of Habitats and Species Regulations 2017, as amended ('The Habitats Regulations') and NatureScot guidance on the consideration of plans or projects affecting SACs and SPAs ^{(3), (4), (5)}. It has also taken account of a range of other guidance material including the DTA Publications HRA Handbook ⁽⁶⁾ and that produced by the European Commission (EC) 2018a ⁽⁷⁾, 2018b ⁽⁸⁾, 2007 ⁽⁹⁾, 2002 ⁽¹⁰⁾.

2.2 Overview of the HRA Process

- 2.2.1 The HRA process comprises four main stages:
 - Stage 1 Screening to identify the likely effects of a project on a European site and consider whether the
 effects are likely to be significant.
 - Stage 2 Appropriate Assessment to determine whether the integrity of the European site will be adversely affected by the Project.
 - Stage 3 Assessment of Alternative Solutions to establish if there are any that will result in a lesser effect on the European site.
 - Stage 4 Imperative Reasons of Overriding Public Interest (IROPI) and Compensatory Measures to
 establish whether it is necessary for the project to proceed despite the effects on the European site, and to
 confirm that necessary compensatory measures are in place to maintain the coherence of the National Site
 Network.
- 2.2.2 The term "Habitats Regulations Appraisal" encompasses both the initial screening stage and, where required, the follow-on Stages 2 4. Stage 1 Screening was described in the HRA Screening Report and will not be considered in this report. Stage 2 is discussed in more detail in the following section.

2.3 Stage 2 – Appropriate Assessment

- 2.3.1 An AA is undertaken by the Competent Authority to determine potential effects of a project upon the integrity of European sites. As the person applying for consent, the Applicant should provide and analyse sufficient information to allow the Scottish Ministers to determine whether the aspects of the project pertinent to their consents will or will not adversely affect the integrity of European sites.
- 2.3.2 AA should exclusively focus on the qualifying features of the European site, and it must consider any impacts on the conservation objectives of those qualifying interests. It should also be based on and supported by evidence that can stand up to scientific scrutiny. EC guidance states that without proper reasoning the assessment does not fulfil its purpose and cannot be considered 'appropriate' and therefore the development

³ NatureScot (Updated 2025) Habitats Regulations Appraisal (HRA) Guidance. Accessed July 2025 at https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra

⁴ NatureScot (2022). European Site Casework Guidance – How to consider plans and projects affecting Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

⁵ NatureScot (2019). Guidance Note - The handling of mitigation in Habitats Regulations Appraisal - the People Over Wind CJEU judgement.

⁶ Tyldesley, D. and Chapman, C. (2013) The Habitats Regulations Assessment Handbook, December 2024 edition UK, DTA Publications Limited.

⁷ European Commission (2018). Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC.

 $^{^{8}}$ European Commission (2018). Guidance on energy transmission Infrastructure and EU nature legislation.

⁹ European Commission (2007). Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC.

¹⁰ European Commission (2002). Assessment of plans and projects significantly affecting Natura 2000 sites.



cannot be consented. In terms of what is reasonable, guidance states "to identify the potential risks, so far as they may be reasonably foreseeable in the light of such information as can be reasonably obtained" (11).

- 2.3.3 In undertaking an AA, there are two phases:
 - a scientific evaluation of all the likely significant effects of the project on the relevant qualifying interests of a European site; and
 - a conclusion based on outcomes of the scientific evaluation whether the integrity of a European site will be compromised.
- 2.3.4 The initial onus when carrying out an AA is to prove that no adverse impacts due to a project will occur, either alone or in-combination with other projects, which would compromise a European sites integrity (Section 63(5) & (6) of the Habitats Regulations). Site integrity can be defined as: "The coherence of its ecological structure and function, across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified" (12).
- 2.3.5 The assessment will also consider any avoidance or mitigation measures which will be implemented to avoid or reduce the level of impact from the project. The Competent Authority may also consider the use of conditions or restrictions to help avoid adverse effects on site integrity.
- 2.3.6 If the AA concludes that the integrity of the European site would be adversely affected, consent can only be granted if there are no alternative solutions, IROPI is applicable and compensatory measures have been secured (Section 64 of the Habitats Regulations).

 $^{^{11}\,\}text{NatureScot}\,(\text{2001}).\,\text{Natura casework guidance: Consideration of proposals affecting SPAs and SACs}.$

¹² NatureScot (2014). Natura casework guidance: How to consider plans and projects affecting Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).



3 INFORMATION TO INFORM THE APPROPRIATE ASSESSMENT

3.1 Introduction

- 3.1.1 The Screening Assessment determined that an AA was required for the Inner Moray Firth SPA and Ramsar site because the potential for LSEs could not be ruled out for the following qualifying interest features:
 - greylag goose (non-breeding) (Anser anser); and
 - osprey (breeding) (Pandion haliaetus).
- 3.1.2 The LSEs on these qualifying interest features are considered to result from the potential for:
 - direct loss from mortality due to collision with infrastructure;
 - barrier effects as a result of the presence of infrastructure; and
 - indirect loss of habitat due to disturbance and displacement.
- 3.1.3 This section assesses the impacts of the Proposed Development on the qualifying interest features in relation to the conservation objectives for the site. The aim is to identify whether no adverse effect can be concluded (as described in **Section 2**), or whether there will be adverse effects on the integrity of the Inner Moray Firth SPA / Ramsar site.
- 3.1.4 The assessment has drawn on the ornithology survey findings which are presented within Volume 2 Chapter 9 Ornithology of the Environmental Impact Assessment Report ("EIA Report") and associated Technical Appendices in Volume 5.

3.2 Conservation Objectives and Latest Assessed Condition

3.2.1 The Conservation Objectives (COs)¹³ for the relevant qualifying interest features of the Inner Moray Firth SPA are set out in Table 3-1. There are no COs set for Ramsar sites.

Table 3-1 Conservation Objectives for Inner Moray Firth SPA

Qualifying Interest Feature	Conservation Objectives			
Greylag goose (non-breeding) Osprey (breeding)	 To avoid deterioration of the habitats of the qualifying species or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and to ensure for the qualifying species that the following are maintained in the long term: population of the species as a viable component of the site; distribution of the species within the site; distribution and extent of habitats supporting the species; 			
	 structure, function and supporting processes of habitats supporting the species; and no significant disturbance of the species 			

¹³ NatureScot Site Link – Inner Moray Firth SPA COs https://www.nature.scot/sites/default/files/special-protection-area/8515/conservation-objectives.pdf



3.2.2 The latest assessed site condition of the relevant qualifying interest features of the SPA are listed in Table 3-2 as detailed on the NatureScot SiteLink¹⁴ site.

Table 3-2 Summary of Site Condition

Qualifying Interest Feature	Latest Assessed Condition*	Date of Assessment	Negative Pressures
Greylag goose (non-breeding)	Favourable Maintained	31 st Dec 2001	No negative pressures listed
Osprey (breeding)	Favourable Maintained	30 th Jun 2003	Recreation / disturbance

3.3 Potential Impacts and Relevant Mitigation Measures

- 3.3.1 Figure 1 illustrates the location of the Proposed Development in relation to the Inner Moray Firth SPA / Ramsar site. The Proposed Development is located approximately 4.4 km to the west of the nearest point of the designated site at its closest point.
- 3.3.2 The Screening Assessment, taking a precautionary approach, concluded that in the absence of mitigation, it is possible that activities during construction and operation could result in LSEs on the SPA / Ramsar site from indirect impacts on breeding osprey and non-breeding greylag goose due to disturbance and displacement from habitat. Construction and operation of the Proposed Development could also result in direct loss of individuals from mortality due to collision with infrastructure and indirect barrier effects from the presence of infrastructure.
- 3.3.3 Embedded project mitigation measures are set out in the Environmental Impact Assessment Report (EIAR) and the General Environmental Management Plans (GEMPs) (Volume 5, Appendix 3.3: GEMPS), Species Protection Plans (SPPs) (Volume 5, Appendix 3.4: SPPs) and will be further reinforced in the final Construction Environmental Management Plan (CEMP) (an outline CEMP has been included in Volume 5, Appendix 3.6).
- 3.3.4 The Bird SPP has been developed in consultation with NatureScot and kept under review to ensure that it is in line with current guidance, and, if appropriate, updated accordingly. Measures within the Bird SPP relevant to the SPA include, but are not limited to:
 - The Ecological Clerk of Works (ECoW) will review whether construction activities are likely to affect breeding birds and, if so, what mitigation options are available. A hierarchical approach to mitigation will be applied to any occupied bird habitat that may be affected under the Project works. Priority will be given to assessing and mitigating impacts to species listed on Schedule 1 of the Wildlife and Countryside Act (1981 as amended), which includes breeding osprey.
 - The ECoW will attend site on a regular basis throughout the construction period to ensure all environmental mitigation relevant to breeding birds is delivered.
 - A hierarchical approach to mitigation of Programme / Avoid / Risk Assess will be applied to any birds that
 may be affected under the Project works. Works to be programmed outwith breeding season, where
 practicable.
 - Appropriate protection zones will be put in place (see Appendix A of the Bird SPP) and will be set by the FCoW.
 - A Protected Species Risk Assessment will be completed by the ECoW when works need to be done in protection zones, to assess if disturbance can be avoided.
 - An emergency procedure will be implemented if breeding birds are encountered, with all works within 50 m (non-scheduled species) or max protection distance (scheduled species) immediately ceasing.

¹⁴ NatureScot (2025). Inner Moray Firth SPA Accessed Feb 2025 at: https://sitelink.nature.scot/site/8515



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 - Specific mitigation such as dissuasion techniques (habitat management, active dissuasion/disturbance) and removal of disused nests.
- 3.3.5 The embedded mitigation measures set out in the EIAR follow industry best practice and are routinely deployed on SSEN Transmission projects. They will be stipulated in construction contracts and the implementation and audit of these measures will be overseen by a suitably qualified and experienced Environmental / Ecological Clerk of Works (ECoW).

In addition to the embedded mitigations, measures for the protection of osprey will also be required to mitigate impacts associated with collision and disturbance and displacement of a breeding osprey territory located within potential disturbance distance that may form part of the SPA / Ramsar site population, including:

- If works are required during the breeding season, this will necessitate the production and approval of a species protection plan, incorporating control of vehicle / pedestrian movements, and toolbox talks to all personnel. With these measures in place, the likelihood of the breeding pair within 300 m of the Proposed Development being displaced will be minimised. In the unlikely event that birds are displaced, it is anticipated that they will move to one of the alternative nest sites nearby which were identified during baseline surveys.
- Flight diverters will be installed on the earth wire between towers 228 and 229.

3.4 Assessment of Effects

3.4.1 The Proposed Development is located approximately 4.4 km to the west of the nearest point of the SPA / Ramsar site at the River Beauly. Baseline surveys of Section D of the Proposed Development recorded two qualifying features of the Inner Moray Firth SPA / Ramsar site within potential connectivity distance, greylag goose and osprey. NatureScot SPA connectivity guidance¹⁵ advises that osprey have a core foraging range from their nest site during the breeding season of 10 km with regular foraging out to 20 km while greylag geese have a core foraging range of 15 – 20 km.

Direct loss from mortality due to collision with infrastructure

- 3.4.2 Greylag goose were recorded in flight on twenty-six occasions across all height bands during flight activity surveys within Section E with all flights within connectivity distance of the SPA / Ramsar site. The species was most regularly recorded in the north of Section E along the River Conon. Observations consisted of ten flights of fewer than 10 birds, eight flights of between 10 50 birds, and four flights of between 51 160 birds. Flights crossed the alignment on thirteen occasions, eight of which were at Collision Risk Height (CRH) (>5 to 70 m). Greylag goose was also recorded in flight on fifteen occasions during flight activity surveys of Section D, with activity concentrated towards the northern and southern ends of Section D. Records consisted of groups of birds flying above CRH with the largest flock recorded crossing the alignment comprising 70 individuals. Greylag goose flights were recorded crossing the alignment on nine occasions, four of which were at CRH and one of which was within connectivity distance of the SPA / Ramsar site. Existing 132 kV and 275 kV OHLs run between the SPA / Ramsar site and the Proposed Development and to the south of the SPA / Ramsar site which birds flying to the west and south of the SPA / Ramsar site to forage must routinely cross.
- 3.4.3 Whilst the recorded flights have potential connectivity (within the core foraging range of 20 km) to the SPA / Ramsar site, given the low number of flights (nine) recorded at CRH crossing the alignment in connectivity distance of the SPA / Ramsar site, the species' high avoidance rate, and the ability of greylag geese to routinely

¹⁵ SNH (2016) Assessing Connectivity with Special Protection Areas (SPAs) Guidance. Version 3 - June 2016.



cross existing OHLs, the risk of collision is considered to be negligible, and will not result in an adverse effect on the SPA / Ramsar site population in relation to the conservation objectives for the site.

3.4.4 Osprey was recorded in flight on 29 occasions during flight activity surveys within Section E, with all flights within potential connectivity distance of the SPA / Ramsar site for regular foraging. Flights crossed the proposed alignment on 11 occasions, nine of which were at CRH. Observations were mostly of single birds although one flight consisted of a pair in flight in April 2024. Flights were concentrated along the River Conon, over Loch nam Bonnach and along the River Beauly. The majority of the flights recorded crossing the proposed alignment occurred in the south of Section E along the River Beauly. Osprey was recorded in flight on one occasion during flight activity surveys of Section D, in June 2024, when a single bird flew west at CRH up Strath Sgitheach, approximately 900 m south of the Proposed Alignment and within potential connectivity distance of the SPA / Ramsar site. Given the concentration of flights across the River Beauly, additional mitigation in the form of bird flight diverters installed between towers 228 - 229 will be implemented. With this additional mitigation in place, impacts are predicted to be negligible and therefore no adverse effect on the SPA / Ramsar site population in relation to the conservation objectives for the site are predicted.

Barrier effects as a result of the presence of infrastructure

3.4.5 Between the SPA / Ramsar site and the Proposed Development there is an existing 132 kV OHL and an existing 275 kV OHL, located approximately 1 km west of the SPA / Ramsar site at their closest and 3-6 km east of the Proposed Development. All species from the SPA / Ramsar site must cross these existing OHLs to reach the Proposed Development. Other 132 kV OHLs and a 275 kV OHL run south of the SPA / Ramsar site towards Elgin. During baseline surveys of the Proposed Development, greylag geese and osprey were all recorded crossing existing OHLs. As a result, no barrier effects are predicted and no adverse effects on SPA / Ramsar site populations in relation to the conservation objectives for the site are expected.

Indirect loss of habitat due to disturbance and displacement

- 3.4.6 In section E, foraging wintering (non-breeding) geese surveys recorded greylag goose on five of the survey visits with December 2023 being the only month that the species was not observed. Birds were routinely recorded foraging close to the Proposed Development in Section E. In March 2024 separate flocks of 70, 80, and 200 birds were recorded simultaneously in a group of fields within potential disturbance distance of the Proposed Development, just north of Muirton Mains. Wintering (non-breeding) geese roost surveys recorded greylag goose at the southern end of Section D, with a flock of 70 geese recorded in flight across the proposed alignment and landing in fields next to the proposed alignment shortly after dawn in December, presumably to feed. All records were within potential connectivity of the SPA / Ramsar site and could relate to birds which form part of the SPA / Ramsar site population. However, there is widespread alternative foraging and roosting habitat in the wider area around the Proposed Development which birds will be able to make use of if displaced by construction activity, including abundant alternative foraging habitat closer to the SPA / Ramsar site. As a result, impacts from disturbance and displacement will be negligible, and will not result in an adverse effect on the SPA / Ramsar site population in relation to the conservation objectives for the site.
- 3.4.7 Within Section D, a single active osprey nest site was recorded approximately 2.3 km west of the Proposed Development, beyond the advised disturbance distance of 750 m for osprey¹⁶. Within Section E, breeding raptor surveys recorded two confirmed territories within 2 km of the Proposed Development. One was approximately 300 m north of the Proposed Development and approximately 380 m north of the proposed alignment, and one approximately 1.5 km north of the Proposed Development and 1.7 km north of the proposed alignment. Desk study records from HRSG from the previous five years identified two other breeding territories within 2 km of the Proposed Development. One was approximately 150 m north of an access track which would be constructed for the Proposed Development and approximately 500 m to the east of the alignment, and one

¹⁶ NautreScot (formally Scottish Natural Heritage) (2016) Assessing Connectivity with Special Protection Areas (SPAs). Guidance.



approximately 720 m to the south of the Proposed Development. Breeding raptor surveys undertaken in 2024 did not record breeding activity at either location. As a result, it has been predicted that construction of the Proposed Development could result in disturbance to one osprey territory with potential connectivity to the SPA (the active nest 300 m of the Proposed Development, within disturbance distance).

- 3.4.8 Embedded mitigation measures outlined in the SSEN Transmission's Bird SPP (Volume 5, Appendix 3.4: SPPs), together with additional mitigation measures to develop a specific osprey protection plan will avoid disturbance and displacement to osprey at breeding sites. Construction activity may result in localised disturbance around waterbodies which ospreys from the SPA / Ramsar site population forage at. However, given the abundant suitable alternative foraging habitat, including the Inner Moray Firth foraging resource, impacts from disturbance and displacement will be negligible, and will not result in an adverse effect on the SPA / Ramsar site population in relation to the conservation objectives for the site.
- 3.4.9 Any potential effects will be managed through the mitigation measures set out in the project Environmental Management Plans. With these measures in place, the impacts of indirect habitat loss or degradation and risks of collision is reduced to negligible; therefore no adverse effects on any of the qualifying bird species in relation to the conservation objectives for the site are predicted.

In-combination Effects

3.4.10 Four other developments were identified which could result in in-combination effects on the Inner Moray Firth SPA / Ramsar site with the Proposed Development.

Beauly to Blackhillock to New Deer to Peterhead 400 kV OHL

3.4.11 A proposed new double circuit steel structure 400 kV OHL between Beauly, Blackhillock, New Deer and Peterhead, approximately 194 km in length, including the diversion of an existing 400 kV OHL into a proposed new Coachford 400 kV substation near Blackhillock, removal of the existing 132 kV OHL from Beauly to Knocknagael substations, and rationalisation and crossings of the existing transmission network are located adjacent to the Proposed Development. Although the EIA Report has not been submitted, information has been provided by SSEN prior to finalising the EIA Report. This has therefore been used to undertake a cumulative assessment, but is subject to change following finalisation of the BBNP EIA Report. The informtion provided identified Scoping Report (issued 26.07.2024) identified important ornithological features asareas in the vicinity comprising; Inner Moray Firth SPA and Ramsar site, Darnaway and Lethen Forest SPA, Moray and Nairn Coast SPA /Ramsar Site as well as together with the presence of 12 species of conservation concern; pink-footed geese, capercaillie, black grouse, greylag geese, red kite, osprey, goshawk, hen harrier common gull and a breeding wader assemblage. The assessment seen predicted no significant effects on any receptors with additional mitigation measures in place. Cumulative effects on the osprey population of the Inner Moray Firth SPA/Ramsar site could occur from collision impacts, however with the additional mitigation measures proposed for the Proposed Development and Beauly to Blackhillock to New Deer to Peterhead 400kV OHL in the form of line marking, in-combination effects are not predicted.

Ceislein Wind Farm

3.4.12 A proposed up to 20 turbine wind farm located adjacent to the Proposed Development. The Scoping Report (issued 23.09.2024) defined important ornithological areas in the vicinity including the Inner Moray Firth SPA / Ramsar site. There is the therefore potential for in-combination effects on the SPA / Ramsar site with the Proposed Development. However, there is insufficient information available at this time on the impacts of



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Ceislein Wind Farm to undertake an in-combination assessment. It is assumed that when it is prepared, the EIAR for Ceislein Wind Farm will assess in-combination effects with the Proposed Development.

Creachan Wind Farm

3.4.13 A proposed up to 21 turbines wind farm located adjacent to the Proposed Development. The Scoping Report (issued 04.09.2024) defined important ornithological areas in the vicinity including the Inner Moray Firth SPA / Ramsar site. There is therefore the potential for in-combination effects on these receptors with the Proposed Development. However, there is insufficient information available at this time on the impacts of Creachan Wind Farm to undertake an in-combination assessment. It is assumed that when it is prepared, the EIAR for Creachan Wind Farm will assess in-combination effects with the Proposed Development.

Carn Fearna Wind Farm

3.4.14 A proposed 9 turbine wind farm, located 5 km northwest of the Proposed Development. The Information to Inform Habitats Regulations Appraisal for the project assessed effects on the Inner Moray Firth SPA / Ramsar site. The assessment only considered collision effects on the greylag goose SPA population and found that collision mortality would be inconsequential. With the embedded and additional mitigation measures in place, the effects from the Proposed Development on the SPA / Ramsar site will be negligible. Consequently, the incombination effects will not adversely affect the SPA / Ramsar site greylag goose population.

3.5 Summary of Effect on Site Integrity

3.5.1 No adverse effects on the two relevant qualifying bird species (greylag goose and osprey) in relation to the Conservation Objectives for the site are predicted and therefore no adverse effect on the integrity of the Inner Moray Firth SPA / Ramsar site is anticipated either alone or in-combination with other projects.

