

Historic Environment Scotland



HISTORIC
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SCOTLAND

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ALBA

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

By email to:

MD.MarineRenewables@gov.scot

Licensing Operations Team
Marine Directorate
375 Victoria Road
Aberdeen
AB11 9DB

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300030259
Your ref: SCR-0098
02 June 2025

Dear Marine Directorate

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

SCR-0098 - MeyGen PLC – Section 36 consent variation – Inner Sound, Pentland Firth
Request for Screening Opinion

Thank you for consulting us on this Environmental Impact Assessment (EIA) screening request, which we received on 26 May 2025. This letter contains our comments for our historic environment interests. That is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas. From 1 January 2025, we no longer provide advice on undesignated underwater cultural heritage. For EIA projects, the relevant competent authority must ensure that they have access to sufficient expertise to examine the EIA Report in accordance with the relevant regulations.

The relevant local authority archaeological and conservation advisors will also be able to offer advice on historic environment impacts. This may include topics covered by [our advice-giving role](#), and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

Our advice

We note that the Screening Report considers the potential for impacts on terrestrial cultural heritage assets (Table 7.12) and concludes that any impacts would fall within the impact envelope considered in the original Environmental Statement (ES) in 2012. Therefore, the Section 36C variation would not result in any additional impacts that could have a significant effect on designated cultural heritage assets. Our predecessor body Historic Scotland was consulted on the original ES and did not object.

We have not identified any potentially significant effects on the historic environment for our interests and therefore have no reason to consider the proposals to be EIA development.

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultations mailbox,

Historic Environment Scotland – Longmore House, Salisbury Place, Edinburgh, EH9 1SH
Scottish Charity No. **SC045925**
VAT No. **GB 221 8680 15**



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hmconsultations@hes.scot. If you have questions about this response, please contact

[REDACTED]

Yours sincerely

Historic Environment Scotland

NatureScot

Kate Taylor
Licensing Operations Team, Marine Directorate
Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

16 June 2025

Our ref: CNS TS MeyGen Phase 2

Sent by email to: MD.MarineRenewables@gov.scot

Dear Kate,

Consultation on request for Screening Opinion under Part 2, Regulation 10(5) of the Marine Works Regulations and Part 2, Regulation 8(5) of the Electricity Works Regulations.

SCR-0098 – MeyGen PLC – Section 36 consent variation – Inner Sound, Pentland Firth

Thank you for consulting us on MeyGen PLC's request for a screening opinion in relation to the proposed Section 36 consent variation.

We have reviewed the accompanying Environmental Impact Assessment (EIA) Screening Report (Document reference: MEY-Fic1-2-REP-004-F-Rev3.docx) and provide advice below.

Variation proposal:

Our understanding is that MeyGen currently holds a Section 36 consent, for which they are seeking to vary to support the installation of a single AR3000 tidal turbine and associated infrastructure at its consented site in the Inner Sound of the Pentland Firth. This development phase, Phase 1b (AR3000), would replace the previously approved Phase 1b (2017) layout of four AR2000 turbines.

While the proposed AR3000 turbine remains within the overall consented envelope for Phase 1 in terms of maximum turbine number (61) and total generating capacity (86MW), it exceeds certain individual turbine parameters.

The proposed variation to the Section 36 consent are as follows:

- Replace the previously consented Phase 1b (2017) layout (four AR2000 turbines) with a single AR3000 turbine referred to as Phase 1b (AR3000).

- Increase the rotor diameter of the single AR3000 turbine from the permitted 16-20m range to 16-26m.
- Reduce the minimum blade-to-seabed clearance for the single AR3000 turbine from 4.5m to 2m.
- Remove the rated power cap of 2.4MW per turbine for the single AR3000 turbine, allowing deployment of a maximum rated capacity of 3.5MW.
- Increase the blade swept area from 201-314m² to 201–531m², based on an increased rotor diameter of up to 26m.
- Increase the export cable voltage for the AR3000 turbine from 6.6kV to a maximum of 12kV (AC or DC).
- A subsea hub (SSH) may be deployed to support alternative export cable configurations. Two electrical configuration options are under consideration: (i) a single export cable (up to 12kV AC) connecting the turbine directly to shore using the existing cable corridor and not requiring the SSH; or (ii) a two-part configuration with 12kV AC from the turbine to a SSH, and 12kV DC from the hub to shore using the existing cable corridor.

All other aspects of the Phase 1 consent, including the consented limit of 61 turbines and 86MW generation capacity, are to remain unchanged.

Collision Risk Modelling (CRM) has been carried out for key marine species (harbour seal, grey seal, black guillemot, European shag and Atlantic salmon) potentially affected by the proposed changes. Based on the CRM results and review of all EIA receptors, MeyGen concludes that the proposed changes do not introduce new significant effects, do not intensify assessed effects to a significant degree and result in predicted impacts that remain within the overall impact envelope established by the ES (2012). Therefore, MeyGen have concluded that the proposed variation does not constitute EIA development under the Electricity Works or Marine Works Regulations.

NatureScot advice

Overall, we are content with the findings outlined in the Screening Report and consider that this proposed variation is unlikely to result in new or intensified significant environmental effects with respect to our interests.

Additional advice is provided below on marine ornithology and marine mammals, which may be required for future phases or further variations but is not required for this proposed variation.

Marine Ornithology

We note that there have been significant changes in terms of both evidence base and assessment processes, as well as changes to the ornithology populations, since the original application was submitted 13 years ago. Therefore, updates to the assessment may need to be considered for future phases or any further variations. Examples of relevant updates include:

- NatureScot Guidance Notes¹ - while primarily developed for offshore wind, the guidance sets out key approaches for HRA and EIA assessments that we expect to be used for all marine energy proposals.

¹ <https://www.nature.scot/doc/guidance-note-1-guidance-support-offshore-wind-applications-marine-ornithology-overview>

- Marine bird foraging ranges², which define both SPA connectivity and EIA populations.
- Tagging work has resulted in updated estimates for availability bias and other collision risk modelling input parameters.
- Approaches to underwater collision risk modelling³.
- Updated colony counts which may be more contemporaneous with the original survey data, as well as more updated population trends, such as changes to populations after mass mortality events. Noting that updated survey data may also be required.

Furthermore, we note it would be pertinent to consider these points in any proposed monitoring to ensure it continues to provide robust and relevant evidence base.

Marine mammals

In relation to seals, the same density estimates from the original modelling have been used to ensure comparability. However, it would have been useful to see both the original and updated density estimates from Carter et al. (2025) to ensure that the changing baseline was accounted for, especially as the density estimates used are now eight years old.

Three different types of turbines will now be installed by MeyGen in the same area, all with slightly different operating speeds, seabed clearances and blade swept areas. If turbine parameters continue to change in future phases, this could add an additional element for seals to consider when avoiding collision that will need to be taken into account when assessing potential impacts.

Potential impacts to the Sanday Special Area of Conservation (SAC) have been screened out of this assessment based on the distance from MeyGen and telemetry data. Although, we are content with this approach in relation to this variation, this may need to be considered further for future phases or additional variations.

We hope this advice is of assistance. Please contact Jenna Lane (jenna.lane@nature.scot) in the first instance for any further advice and copy to our marine energy mailbox – marineenergy@nature.scot.

Yours sincerely,

Kim McEwen
Marine Sustainability Adviser / Sustainable Coasts and Seas

² Woodward, I., Thaxter, C.B., Owen, E., Cook, A.S.C.P. 2019. Desk-based revision of seabird foraging ranges used for HRA screening. BTO Research Report 724

³ <https://www.nature.scot/doc/assessing-collision-risk-between-underwater-turbines-and-marine-wildlife>

Scottish Environment Protection Agency

From: [Planning.North](#)
To: [MD Marine Renewables](#)
Cc: [MD Marine Licensing](#)
Subject: PCS-20005646 SEPA Response to SCR-0098
Date: 26 May 2025 15:57:04
Attachments: [image.png](#)

To Whom It May Concern

Electricity Act 1989 - Section 36

SCR-0098

SCR-0098 - MeyGen PLC Consultation on Request for Screening Opinion Inner Sound, Pentland Firth

Thank you for the above consultation. Based on the information provided, it appears that this application falls below the thresholds for which SEPA provide site specific advice. Please refer to our standing advice and other guidance which is available on our [website](#). In addition, please also refer to our SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations available [here](#).

If there is a significant site-specific issue, not addressed by our guidance or other information provided on our website, with which you would want our advice, then please reconsult us highlighting the issue in question and we will try our best to assist.

I trust these comments are of assistance - please do not hesitate to contact me if you require any further information.

Kind regards

Nicki Dunn

Senior Planning Officer



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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom

fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk. Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhruid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1 4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghlèidheadh agus airson adhbharan laghail eile.

The Highland Council

Marine Directorate

Marine Licensing Operations Team
Marine Laboratory
Aberdeen
AB11 9DB

Please ask for: **Alexis Chatterton**

Direct phone: [REDACTED]

Your ref: SCR-0098

Our ref: 25/02070/SCRE

Date: 30th June 2025

Dear Kate,

Deployment of a Single AR3000 First in Class Tidal Turbine and Associated Infrastructure.

Thank you for consulting the Highland Council on the above proposal. This was registered on the 31st May 2025. We have reviewed the accompanying information and have the following comments.

MyGen seeks to vary certain parameters and conditions set out in the Section 38 consent (2013) and the Phase 1b decision notice (2017). The proposed changes relate to the deployment of a single AR3000 turbine and associated infrastructure as part of Phase 1b (AR3000) of MyGen Phase 1 development. Those changes are listed below;

- Replace the previously consented 4 AR2000 turbines with a single AR3000 turbine.
- Reduce the number of authorised turbines for Phase 1b from four to one but retaining the associated support structure permitted under the existing consent for phase 1 (up to 61 turbines).
- Increase the rotor diameter for the single AR3000 turbine from the permitted 16-20m range to 16-26m.
- Reduce the minimum blade to seabed clearance for the single AR3000 turbine from 4.5m to 2m.
- Remove the rated power cap for the AR3000 turbine from 2.4MW to a maximum capacity of 3.5MW.
- Increase the blade sweep area for the single AR3000 from 201-314m² to 201-531m².
- Increase the export cable voltage for the AR3000 turbine from 6.6kV to a maximum of 12kV

There will be no change to the installed capacity which will remain at 86 MW, no change to the number of rotors or blades per turbine, minimum clearance from blade tip to sea surface, cut in/out flow speed, minimum separation distance between turbines, options for power conditioning, transportation of turbine to site or installation.

It is therefore considered that the seascape, landscape and visual interest will not require further consideration and the proposal does not introduce any new significant environmental effects.

Yours sincerely



Alexis Chatterton

Planner - Aquaculture & Coastal