Historic Environment Scotland

By email to:
MD.MarineRenewables@gov.scot
Marine Directorate (Marine Renewables)
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

HMConsultations@hes.scot
0131-668-8716

Our case ID: 300046189
Your ref: SCR-0115
28 October 2025

Dear Marine Directorate

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

Pentland Floating Offshore Wind Farm, Caithness
Marine Licence Variation Screening Report

Thank you for consulting us on the Marine Licence Variation Screening Report regarding the variation of the Section 36 Consent for the above offshore wind farm. We received the consultation on 21 October 2025.

We have reviewed the report and considered the proposed development in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.
The relevant cultural heritage advisors will also be able to offer advice on impacts on the historic environment. 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.

From 1 January 2025 we no longer provide advice on undesignated underwater cultural heritage. This includes the preparation of documents for post-consent activities including Written Schemes of Investigation or Protocols for Archaeological Discoveries. 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.

Our Advice

We understand that the screening regards the reduction of turbines and the variation of consented timeframes for the offshore wind farm. We note that the assessment states that there will be no further significant impacts from the proposals, and we are content to agree with this assessment regarding our interests. We therefore have no further comments to make on the proposals.

Our decision not to provide comments should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

Further information

Decisions that affect the historic environment should take the Historic Environment Policy for Scotland (HEPS) into account as a material consideration. HEPS is supported by our Managing Change guidance series.

Please contact us if you have any questions about this letter.

Yours sincerely

Historic Environment Scotland

NatureScot

From:	[Redacted]
To:	MD Marine Renewables
Cc:	[Redacted]
Subject:	RE: SCR-0115 - Highland Wind Limited - Variation of s.36 Consent and Generating Station Marine Licence - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Consultation on Request for Screening Opinion - NatureScot Response
Date:	02 December 2025 15:35:57
Attachments:	image001.png image004.png image002.png

Hi LOT colleagues –

It's now clear what clarification is needed here – I confirm that in NatureScot's view an EIA is not required in support of this Variation application.

Our previous response sets out what we think should be included in a targeted ornithology assessment to support the Variation application.

I hope this advice is clear.

All the best.

--

Malcolm Fraser (he/ him) | **Marine Sustainability Manager**

NatureScot | [Redacted]

nature.scot | *@naturescot* | *Scotland's Nature Agency* | *Buidheann Nàdair na h-Alba*

NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Marc MacFarlane
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

30 October 2025

Our ref:
CNS/REN/OSWF/DEMONSTRATION SITES/Pentland Floating Offshore

By email only

Dear Marc

PENTLAND FLOATING OFFSHORE WIND FARM – SECTION 36 CONSENT VARIATION - CONSULTATION ON REQUEST FOR SCREENING OPINION

Thank you for your consultation on the 21st of October 2025 for a screening opinion in relation to their proposed Section 36 variation ("Variation 02") for the Pentland Floating Offshore Wind Farm (PFOWF).

We have reviewed Highland Wind Limited's (HWL) EIA Screening Report (Document Number: GBPNTD-ENV-PEN-CM-00012) and we provide the following advice:

Variation Proposal:

HWL currently holds a Section 36 consent (as varied), for which they are seeking to vary the following parameters:

- Increase in rotor diameter from 1x WTG with rotor diameter of 220m and 5x WTGs with rotor diameters of 250m, to a maximum of 6 WTGs with rotor diameters of 260m;
- Reduction in air gap from 35m to a minimum of 28m;
- Reduction in blade width from 7m to a maximum of 6.93m;
- Reduction in rpm from 8 to a maximum of 6.61; and
- Reduction in operational time from an average of 95% (operational) and 5% (downtime) to an average of 88% (operational) and 12% (downtime).

Three WTG design scenarios are under consideration for the Project, which are as follows:

1. Design Scenario 1: 6 x 18MW WTGs with rotor diameter 260m and air gap of 30m
2. Design Scenario 2: 5 x 18MW WTGs with roto diameter 260m and air gap of 28m

3. Design Scenario 3: 6 x 15MW WTGs with rotor diameter 236m and air gap of 28m

HWL considers that a further EIA is not required for the proposed Section 36 variation. This is based on HWL's conclusion that the impacts of the proposed changes will be no greater than those from the previous variation ("Variation 01"), and that no additional significant impacts will arise as a result of this variation. Therefore, they conclude that this proposed Variation 02 does not constitute an EIA development, and an EIA is not required.

NatureScot advice

Overall, we are content with the approaches and findings outlines in the Screening Report and in our view a full EIA is not required to support the proposed Variation 02 application. Please see below for further advice specific to ornithology and SLVIA.

SLVIA

Having reviewed the Screening response, we do not consider the proposed Variation 02 capable of raising issues of National Interest in relation to its landscape, visual or cumulative effects. This is not to say that the development would not result in significant landscape or visual effects, rather that NatureScot does not judge these effects to meet our 'national interest' threshold for landscape and visual impacts.

Ornithology

As stated in the Screening Report (Section 1.1) the Habitats Regulations Appraisal processes fall outwith the requirements of EIA Screening. However, HSL have provided an addendum (Appendix 1) which addresses potential implications of the proposed Variation 02 refinements on ornithological features and designated sites.

No significant adverse effects were identified for ornithology receptors within the original EIAR or Variation 01. Table 4.2 details the impact of design refinements on marine ornithology receptors, and states that the Rotor Swept Area (m^2) for Scenario 3 is the only scenario to increase above the original consented RSA. However, Table 4.1 shows that Scenario 1 is the only scenario to have an increase in RSA from the original consent, which we believe is the correct option. Scenario 1's increase in RSA represents the only proposed increase above the design envelope assessed within the original consent.

We advise that HSL provide a revised ornithological assessment, which looks at the project alone and-combination impacts of the proposed Variation 02. We advise that this assessment focuses on Collision Risk Modelling for Kittiwake, as a feature of the North Caithness Cliffs SPA. This assessment should include 95% confidence intervals for Population Viability Analysis, as advised in our previous advice (12th August 2025).

Yours sincerely,

Harriet Sperrin

Marine Sustainability Adviser

Orkney Islands Council

From:	Marine Planning
To:	MD Marine Renewables
Subject:	RE: SCR-0115 - Highland Wind Limited - Variation of s.36 Consent and Generating Station Marine Licence - Pentland Floating Offshore Wind Farm - Dounreay, Caithness - Consultation on Request for Screening Opinion - Response Required by 10 November 2025
Date:	06 November 2025 15:31:03
Attachments:	image003.png

Classification: NOT PROTECTIVELY MARKED

Hi,

Thank you for consulting us. OIC Marine Planning have no comments to make on the SCR-0115 Variation of s.36 Consent and Generating Station Marine Licence for the Pentland Floating Offshore Wind Farm.

Kind regards,
Emily

Emily Murphy Gray | Graduate Marine Planner
Development and Marine Planning | Planning and Regulatory Services
Infrastructure and Organisational Development | Orkney Islands Council
01856 873535 [Redacted] [Redacted] | OIC Marine Planning

Scottish Environment Protection Agency

From: Planning.North
To: MD Marine Renewables
Cc: [Redacted]
Subject: RE: PCS-20007066 SEPA Response to SCR-0115
Date: 17 November 2025 11:00:10
Attachments: image003.png
image010.png
image011.png
image002.png
image004.png
image005.png
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OFFICIAL

Dear Claire,

Apologies for the delay in responding to your email below.

Based on the information submitted to us we consider that, with respect to interests relevant to our remit, the proposed development will be unlikely to have a significant effect (in the context of the Regulations) on the environment and therefore Environmental Impact Assessment (EIA) is **not required**.

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

Kind regards,

Barbara Olszowy
Planning Officer
Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

Planning.North@sepa.org.uk
Inverdee House I Baxter Street I Aberdeen I AB11 9QA
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Where passion meets purpose, for a positive environmental impact across Scotland.

Working flexibly

I work flexibly (Monday - Thursday).

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OFFICIAL

The Highland Council

The Highland Council
Comhairle na Gàidhealtachd

Marc MacFarlane
Licensing Operations Team
Marine Directorate
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

By e-mail to:
[Redacted]
MD.MarineRenewables@gov.scot

Please ask for / Foighnich airson: Laura May
Direct Dial / Àireamh fòn: [Redacted]
Email / Post-d: [Redacted]
Our Ref / Ur n-àireamh-iùil: 25/04011/MAR
Your Ref: SCR-0115
Date / Ceann-là: 20 November 2025

Dear Marc,

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

PROPOSAL: HIGHLAND WIND LIMITED - VARIATION OF SECTION 36 CONSENT AND GENERATING STATION MARINE LICENCE - PENTLAND FLOATING OFFSHORE WIND FARM
LOCATION: DEVELOPMENT SITE 9KM NW OF DOUNREAY NUCLEAR RESEARCH ESTABLISHMENT

I refer to the above proposed development and to your request, dated 21 October 2025, for a Screening Opinion under Regulation 8 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 ("the Regulations").

Screening Opinion

It is considered that **Environmental Impact Assessment is NOT required** for the development described in the letter and information accompanying your screening request.

The rationale behind this screening opinion is as follows:

1. The proposal does not constitute Schedule 1 development under the Regulations; and

2. While the proposal does fall within the definition of 'Schedule 2 development' (Regulation 2 - Interpretation), in that it is a generating station, having screened it against the selection criteria outlined in Schedule 3 (including cumulative impact, pollution, impact on natural resources/the natural environment, environmental quality and the historic environment), impact on the receiving environment, while possible, is not considered to be significant. Therefore, The Highland Council does not consider the proposed development to constitute 'EIA development' and an Environmental Impact Assessment (EIA) is not required.

While it is currently anticipated that the proposed variation will not result in significant adverse environmental effects, further details, as requested by NatureScot, must be provided at the application stage to verify this conclusion.

Negative Screening Opinions

The Highland Council requests that the developer is reminded of the importance to note that a negative screening opinion, i.e. one which states that EIA is not required, does not indicate that the proposed development will not have an adverse impact on the receiving environment. It merely constitutes an opinion that any impact is unlikely to be significant in terms of the criteria outlined in Schedule 3 of the Regulations.

The Applicant should note that it remains entirely possible that the proposed development may have an unacceptable impact, perhaps within a more localised area, and a negative screening opinion should not, therefore, be taken as an indication that there are no environmental issues and planning permission will automatically be forthcoming.

The Applicant is therefore advised that it is essential that any subsequent application for Section 36 Consent is accompanied by sufficient information to fully assess its environmental impacts, in particular in relation to the following criteria:

- Landscape and Visual Impacts;
- Impacts from lighting;
- Noise and odours;
- The historic environment – archaeology;
- Trees and woodland, specifically if any impacts would occur on adjacent woodland;
- Landscaping;
- Ecology, including protected species;
- Habitat and biodiversity enhancement;
- Roads and transport impacts;
- Environmental management during construction;
- Fire hazards and fire safety;
- Flood risk and drainage;
- Reinstatement and restoration.

Alterations to the Development as Proposed

If the scale, character, location and/or impact potential of the proposed development changes at any point in future, a reassessment of the need for EIA may be required. You are therefore requested to contact us to discuss any alterations to the proposal at an early stage and prior to the submission of a planning application.

Additional Guidance and Considerations

The Applicant may also wish to read our own advice and guidance on renewable energy developments, copies of which are available via: http://www.highland.gov.uk/info/198/planning_-_long_term_and_area_policies/152/renewable_energy/2

The Highland Council
Comhairle na Gàidhealtachd

Should you require any further information or clarification on any of the above, please do not hesitate to contact me.

Yours sincerely,

Laura May
Professional Support Officer – Strategic Projects Team.

Please Note: This screening opinion does not constitute pre-application planning advice. The merits of the proposed development have not been assessed, nor has its acceptability in terms of material planning considerations and development plan policy.