

Fisheries Management Scotland



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Licensing Operations Team
Marine Directorate
By e-mail

8 August 2026

Dear Sir/Madam

MeyGen Tidal Project – Inner Sound, Pentland Firth

Fisheries Management Scotland is the representative body for Scotland's District Salmon Fishery Boards, the River Tweed Commission and charitable Rivers and Fisheries Trusts. Our members work to conserve Scotland's valuable and iconic wild salmon and freshwater fish and fisheries and the aquatic environment on which they depend.

Offshore renewable energy has an important role to play if the Scottish Government are to meet their commitment for Scotland to reach net-zero emissions of all greenhouse gases by 2045. However, there remain a number of outstanding questions and concerns about the potential negative effects on diadromous fish, including Atlantic salmon and sea trout.

District Salmon Fishery Boards have a statutory duty to protect and improve salmon and sea trout fisheries. In assessing marine renewable energy developments (wind, wave or tidal), it is important that DSFBs and Fisheries Trusts, can be assured that all potential negative impacts have been assessed in full, and mitigations put in place. Where uncertainty remains, the developer should be required to contribute to research which will help fill these evidence gaps, as a condition of their operational consent. In addition, and in the light of the nature crisis, we believe that all developers should contribute to projects designed to conserve and restore important habitat at a catchment scale.

Across Scotland, wild salmon populations are in crisis, and face a range of pressures, some of which are under human control. The Scottish Government have published a [wild salmon](#)

[strategy](#) and [implementation plan](#), which sets out the actions to be taken over a five year period to 2028. The implementation plan includes a number of actions under the heading of "understanding and mitigating pressures in the marine and coastal environment".

Where salmon populations are below their conservation limits, any additional pressure, including from marine renewables, cannot be considered sustainable. Scottish salmon rivers are categorised by the Scottish Government under The Conservation of Salmon (Scotland) Regulations 2016, according to the likelihood of them meeting their conservation limits. The most recent river gradings have been [published for 2026](#). There are now 115 rivers across Scotland graded as Category 3, meaning there is a less than 60% probability of meeting their conservation limit.

It is now well-recognised that populations of Atlantic salmon have rapidly deteriorated across their native range. In the latest species reassessment by the [IUCN Red List](#) of Threatened Species, released in December 2023, Atlantic salmon have been reclassified from 'Least Concern' to 'Endangered' in Great Britain (as a result of a 30-50% decline in British populations since 2006 and 50-80% projected between 2010-2025), and from 'Least Concern' to 'Near Threatened' in terms of global populations (as a result of global populations declines of 23% since 2006).

We note, and support, the recent position that the Marine Directorate have taken - "*MSS do not consider it appropriate for an EIA/HRA to conclude there is no or negligible impact just because no evidence exists of the impact. MSS advise that impacts to diadromous fish must be adequately investigated, rather than relying on a lack of evidence to claim there is no impact*".

There is considerable uncertainty around the potential for impacts of tidal energy projects on Atlantic salmon, with limited evidence to support claims of lack of impacts. Given the significant decline in wild Atlantic salmon populations in recent years we are strongly of the view that a precautionary approach in assessments is required. Such an approach should take into account both the interactions of migratory fish within the project site, but also with the proposed cabling routes and landfall. Assessments of impacts on migratory fish species should also consider cumulative impacts, not only at sea, but also any impacts associated with terrestrial infrastructure, energy transmission and with particular emphasis on associated river crossings for cables.

There are 17 Special Areas of Conservation for which Atlantic salmon are either a primary reason for designation or a qualifying feature. For sea lamprey, there are six SAC sites and for river lamprey, there are six SAC sites. For freshwater pearl mussel, there are 19 SAC sites.

There is strong evidence arising from a series of tracking studies undertaken by the Marine Directorate that the Pentland Firth is extremely important area for returning adult salmon from the majority of Scotland's rivers. In our view, the assessments will need to scope in all 17 SAC rivers designated for Atlantic salmon in Scotland, in addition to those designated for freshwater pearl mussel.

We note that Scotland's SAC's have not had a site assessment since 2011 when numbers of returning adult salmon were significantly higher than they are now. The National Electrofishing Programme Scotland (NEPS) was developed in response to the declining salmon numbers to provide a more detailed understanding of the salmon populations and the pressures acting on them. Although NEPS was not designed to assess the status of the SACs, an assessment was possible of the larger SACs that were surveyed in the 2021 sampling programme. Only half of those SACs were considered to be in favourable condition (Malcolm et al 2023).

Whilst there is often a focus on rivers designated at Special Areas of Conservation (SACs), it is important to recognise that the drivers behind declines in wild salmon and sea trout, and other species of migratory fish, affect **all** rivers to a greater or lesser extent. In recognition that the marine phases of both Atlantic salmon and sea trout are included on the list of Priority Marine Features - the habitats and species of *greatest conservation importance* in inshore waters – we consider that **all** relevant rivers should be fully considered in the consenting and assessment process.

Under Scottish Marine Energy Research (ScotMER), the [Diadromous Fish Receptor Group](#) has identified evidence gaps related to the health, distribution, and impacts on Diadromous fish (salmon, sea trout, etc.). Scottish Government has published an 'evidence map' (available for download at the above link) which identifies and scores these evidence gaps according to a specific prioritisation process. It is important that each of these evidence gaps is considered in full by the applicant, and developers should *contribute* to filling these evidence gaps as a **specific condition of consent**.

In order to properly assess Environmental Statements for developments, information on the use of the development area by diadromous fish should be provided. If such information is lacking then a suitable monitoring strategy should be devised, either for the site in question or through contributing to strategic projects undertaken through ScotMER. Any monitoring strategies must include pre-construction monitoring in order that baseline information on movement, abundance, swimming depth, feeding behaviour etc. can be collected.

Offshore renewable developments have the potential to directly and indirectly impact diadromous fish. We would therefore expect developers to assess and, where necessary, mitigate the potential impacts of deployed devices on such fish during the deployment,

operation and decommissioning phases. These potential impacts have been highlighted through ScotMER, and include:

- Avoidance (including exclusion from particular rivers and subsequent impacts on local populations);
- Disorientation effects that could potentially affect behaviour, susceptibility to predation or by-catch; and
- Impaired ability to locate normal feeding grounds or river of origin; and delayed migration

Scotland's National Marine Plan includes the following policy which relates to diadromous fish:

WILD FISH 1: The impact of development and use of the marine environment on diadromous fish species should be considered in marine planning and decision making processes. Where evidence of impacts on salmon and other diadromous species is inconclusive, mitigation should be adopted where possible and information on impacts on diadromous species from monitoring of developments should be used to inform subsequent marine decision making.

We would emphasise that to date, and as detailed above, there remains considerable uncertainty around evidence of impacts on salmon and other diadromous species. We therefore expect to see proposals for strategic research **and** mitigation. In the case of mitigation, this should be focussed, in line with international advice via NASCO, on projects which improve freshwater conditions and increase the number of healthy wild salmon and sea trout smolts leaving Scotland's rivers.

Specific Comments

MeyGen Phase 2 represents a substantial increase in scale and potential environmental interaction compared to earlier phases, including:

- Expansion from an initial 4 turbines to a proposed 60 MW development, with up to 34 turbines (30 of which are increased in size) at full build-out
- Increased turbine diameters (up to 16 to 26 m)
- Reduced seabed and surface clearance (to 2 m from seabed and 6 m from LAT respectively)

These changes represent a step-change in spatial footprint, turbine density, and interaction potential with migratory fish, and must be fully assessed within the EIA. We do not consider that the environmental impacts of Phase one have been adequately determined which we consider to be a wasted opportunity, particularly in relation to sensitive diadromous fish species.

As we understand the situation no new site-specific surveys are currently proposed, with baseline conditions derived from existing literature and datasets. This approach is not sufficient. The MeyGen project has had eight years to gather baseline data and study impacts of the current turbine array.

As set out above, and in previous FMS/ASFB responses, we have consistently emphasised that the Pentland Firth is a strategically important migration corridor for Atlantic salmon. In the absence of robust data, a precautionary assumption of high usage must be applied. The EIA is currently based on their 'potentially' being other routes for migrating with no data to back this claim up.

Without site-specific data on, migration routes, depth distribution, temporal patterns and fish density it is not possible to robustly assess impact significance or collision risk. Proposed uses of eDNA may be sufficient for determining the presence of some species but Atlantic salmon return to the Scottish coast throughout the year. The proposed data collection period (summer 2026) is therefore not sufficient.

Collision risk remains a key impact pathway, yet existing modelling approaches rely heavily on assumptions and key behavioural inputs (evasion, avoidance) remain poorly evidenced.

FMS attended a scoping workshop and it was disappointing to hear that previous work carried out in 2022 by the University of Stirling and Aquatera, in conjunction with Nature Scot, MASTS and MeyGen, was not even known to the current project team at MeyGen, let alone acted on.

The collision risk study conducted by the University of Stirling study highlights that there is currently insufficient *in-situ* data to robustly develop and determine collision risk for MeyGen's current tidal turbines, let alone the proposed bigger turbines. Simple steps are proposed in the document that MeyGen need to take to properly determine collision risk with fish and other species. These include proper maintenance of cameras recording the turbine swept area and ensuring full coverage of the turbine swept area within the field of view of cameras. This proper data collection is the minimum required to determine collision risk with fish and other species.

Furthermore, previous FMS responses identified significant flaws in modelling assumptions, including:

- Use of array footprint as a proxy for fish distribution
- Failure to account for multiple transits through the array
- Lack of consideration of visibility, behaviour, and environmental variability

Given these limitations, any conclusion of "low" or "negligible" collision risk must be supported by empirical evidence, not assumption.

Conclusion

It should be emphasised that we have no wish to prevent or delay any proposed development unnecessarily and we remain keen to work constructively with the developers and the Marine Directorate to identify appropriate monitoring programmes which will allow us to be able to assess the acknowledged risks of this development, and other proposed developments in a more appropriate manner. There is a clear and urgent need to fund, plan and start strategic research on the movement, abundance, swimming depth, feeding behaviour and impact pathways relevant to diadromous fish. Such research would clearly feed into the potential mitigation measures that might be deemed appropriate, and the conditions under which such mitigation should be enacted. Developers should be required to work together to fund strategic monitoring, in order to allow more certainty for all involved.

The scale of proposed offshore developments and other technical approaches to marine renewables development represents a step-change in the exposure of marine animals of high cultural and economic significance to attendant risks. As highlighted above, understanding of many of these risks is insufficient to support proposals for mitigation even at this late stage when substantial developments are being submitted for licensing. The cumulative impact of this proposal alongside those developments already submitted or likely to follow in the near future is potentially even greater. We believe that more needs to be done to ensure that the best scientific talent is made available to find practicable ways to address the unresolved uncertainties. Fisheries Management Scotland would welcome an opportunity to constructively engage with any such process.

Yours faithfully,

[Redacted]

CEO, Fisheries Management Scotland

Historic Environment Scotland



HISTORIC
ENVIRONMENT
SCOTLAND

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Our case ID: 300030259
Your ref: SCOP-0075

21 July 2026

Dear Marine Directorate

The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
MeyGen Tidal Project – Inner Sound, Pentland Firth
Scoping for Section 36 Consent variation and Marine Licence Variation (June 2026)

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 25 June 2026. We have reviewed the details in terms of our historic environment interests. This covers cultural 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.

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.

The relevant local authority archaeological and 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.

Our advice

We understand from Chapter 4 of the scoping report that the proposed variation relates solely to offshore components of the project, including changes to the Consented Array Area and Consented Cable Corridor, turbine parameters, and offshore electrical infrastructure. No changes to the onshore elements including the location or design of the landfall or the Power Conversion Unit Building are proposed as part of the proposed variation. We also note that a minimum clearance of 6.0m from blade tip of the turbine to Lowest Astronomical Tide has been proposed in Table 4-1.

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Scottish Charity No. **SC045925**
VAT No. **GB 221 8680 15**



We consider that the proposed variation is unlikely to have significant adverse impacts on heritage assets within our remit. We are therefore content that our historic environment interests can be scoped out.

We note that the applicant has indicated in paragraph 4.1.36 of the scoping report that separate consents will be sought for the onshore cable connection, with the associated EIA if required, and this connection does not form part of the proposed variation assessed within this scoping report. The competent authority may wish to consider if the onshore cable connection and the proposed variation would constitute a single project for the purposes of EIA.

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](#).

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

[Redacted]

Yours sincerely

Historic Environment Scotland

Marine Analytical Unit

MeyGen Tidal Project

Marine Analytical Unit (“MAU”) Response Marine Directorate

The MeyGen Tidal Project scoping report that has been submitted includes descriptions of a range of potential impacts. This response focuses on the assessment of socio-economic, tourism and recreation impacts.

This scoping report pertains to a Proposed Variation to the MeyGen project that was consented in 2013. The Environmental Statement (2012) stated a range of socio-economic, tourism and recreation impacts and consent was granted in 2013 and varied in 2019.

In this scoping report, the applicant has scoped out all socio-economic, tourism and recreation impacts. The applicant states that the Proposed Variation is not likely to make a significant change to assessment contained within the Environmental Statement (2012), which was subsequently consented in 2013. The applicant highlights that if at all, the proposed variations are likely to lead to similar or less impact than was assessed in the initial Environmental Statement (2012).

Given that this scoping report references the assessment made in the Environmental Statement (2012) as the main reason for not undertaking a further assessment for the Proposed Variation, the MAU would like to highlight that the socio-economic assessment of the Environmental Statement (2012) should remain valid.

However, the applicant does state in 17.4.24 that:

“The Proposed Variation will vary several parameters from what was consented in the 2013 Section 36 Consent”

The applicant has therefore provided rationale for how they perceive the Proposed Variation will change each of the socio-economic, tourism and recreation receptors assessed in 2012 and why they have scoped them out. The MAU is therefore content with socio-economics, tourism and recreation being scoped out from a further environmental impact assessment.

**Marine Directorate - Science,
Evidence, Data and Digital**



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**CASEWORK OFFICER
LICENSING OPERATIONS TEAM
MARINE DIRECTORATE
SCOTTISH GOVERNMENT**

11 August 2026

**RE: MeyGen PLC - MeyGen Tidal Project – Inner Sound, Pentland Firth - Consultation
on Request for EIA Scoping Opinion and HRA Screening Opinion – Version 2**

Advisors from the SEDD Marine Renewables & Ecology Team have reviewed the above request and provide the following advice.

Commercial fisheries

Data Sources

MD-SEDD advise that there is a further dataset available for the under 12m fleet published by the Scottish Government. The gridded fisheries data for under 12m vessels (2018-2022) is split by gear type and may be useful for spatially mapping the activity of the local static gear fishery at a finer scale. The data are available as heat map layers on [Marine Scotland Maps](#) and can also be downloaded via [Spatialdata.gov.scot](#). The layers can be quickly accessed from the links at the bottom of this page: [Fishing - Activity data and statistics | Marine Scotland Information](#).

When using MMO VMS datasets to produce spatial maps of fishing activity, MD-SEDD advise that the data are used to present figures showing both fishing effort (kW per hour) and average VMS value. Areas of low effort may not necessarily equate to areas of low value so it is advised to visualise the fishing activity using both indices.



MD-SEDD also advise that when using the Fisheries Sensitivity Mapping and Displacement Modelling (FiSMaDiM) data source in the EIA it would be helpful to present maps of these data rather than text alone.

Embedded Mitigation

MD-SEDD advise that the Cable Plan (COM 01) should be included within the embedded mitigation for commercial fisheries, as this plan may be relevant if there is potential for creel fishing to be present over the cable corridor post construction.

Potential Impacts

MD-SEDD note that the impact “Reduction in access to, or temporary exclusion from, established fishing grounds” has not been identified as an impact under the Operation and Maintenance phase, and as such no justification has been given as to whether this will be scoped in or out of the assessment. MD-SEDD advise this is a potential impact during the O&M phase, and justification is needed if this is to be scoped out of the EIA assessment. MD-SEDD agree with the scoping out of this impact for the construction and decommission phases.

Cumulative effects assessment

MD-SEDD advise that the impact “Reduction in access to, or temporary exclusion from, established fishing grounds” should still be considered within the cumulative effects assessment despite being scoped out of the project alone assessment for the construction and decommissioning phases.

Physical processes advice

The MD-SEDD have reviewed Chapter 8 Marine and Coastal Processes in the MeyGen EIA scoping report (2026), and the supporting material on the validity and transferability of the original DHI modelling (appendix 2 and supporting report).

MD-SEDD advise that MeyGen propose scoping out all Marine and Coastal Processes from the EIA report supporting this proposed variation to the existing marine license. The



justification for this is that the assessment in the original EIA on a particular impact pathway was either overly precautionary or that the proposed changes remain within the original design/Rochdale envelope. MD-SEDD have some concerns with this approach because MeyGen are proposing to install turbines slightly further to the west of the originally consented array area. For example, whilst the number of installed turbines is reducing, their locations are likely to change (modelled layout 1 has the further west) and therefore the impacts may change slightly. Whilst the physical processes and conditions are very similar at the new locations, the resulting sediment transport pathways and ultimate fate of sediments may differ.

Appendix 2 summarises the modelling work undertaken to investigate the validity and transferability of the original DHI modelling. More recent modelling of the current velocities are compared with the DHI modelling results. These new results take into account the newly proposed positions of the 30 additional turbines. Broadly, the new modelling results show a very similar spatial picture of increased and reduced current speeds. However, the results are showing higher magnitude maximum current speed decreases and increases (due to the array) close to the array. MD-SEDD advise that this could have an impact on sediment transport as higher current speeds are likely to entrain sediment with larger grain size, and potentially higher concentrations. No new sediment transport modelling has been performed.

MD-SEDD advise that whilst the original DHI modelling (using the tools available at the time) was undoubtedly overly precautionary, the predicted changes may not fully represent the potential impacts caused by the amended array design. MD-SEDD also advise that the new modelling methodologies are more suitable to the proposed array and should therefore be used within the EIA for the proposed design amendments. MD-SEDD therefore advise keeping marine and coastal processes in scope for the EIA supporting this proposed variation to the existing marine license.

MD-SEDD response to scoping questions for Marine and Coastal Processes and Marine Water and Sediment Quality:

- 1) *Do you agree with the study area that has been identified for marine and coastal processes?*
Yes
- 2) *Do you agree that the baseline data sources identified are sufficient to adequately characterise the marine and coastal processes?*
Yes

- 3) *Do you agree that all impacts/ pathways/ effects that could arise from all stages of the Proposed Variation have been identified for marine and coastal processes?*
Yes, and they should be kept in scope.
- 4) *Do you agree that transboundary impacts for marine and coastal processes may be scoped out of the EIA?*
Yes, and cumulative impacts for marine and coastal processes can be scoped out too.
- 5) *Do you agree on the suitability of proposed embedded mitigation of relevance to marine and coastal processes that have been identified for the Proposed Variation?*
Yes
- 6) *Do you agree that a WFD Compliance Assessment is a requirement?*
MD-SEDD have no experience with such assessments. MD-SEDD therefore advise that SEPA are consulted.

Yours sincerely,

Marine Renewables and Ecology Team

Marine Directorate – Science, Evidence, Data and Digital



Maritime & Coastguard Agency



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24 July 2024

Reference: SCOP-0075

REQUEST FOR SCOPING OPINION UNDER THE ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017 FROM MeyGen PLC – INNER SOUND PENTLAND FIRTH.

Thank you for your email dated 25 June 2026 requesting comments on the scoping report provided by Meygen PLC within the Inner Sound of Pentland Firth. The MCA welcomes the opportunity to provide comments under the above Environmental Impact Assessment Regulations, and we would comment as follows:

We note that the variation in Section 36 consent and Marine License is sought for a change in the original area of deployment, reduction in the footprint, reduction in number of turbine from 61 to 34, increase in device dimensions including rotor diameter, rotor swept area, decrease in clearance of turbine rotors from seabed to 2m. reduction in clearance above blade tip to LAT as 8m-6m and a removal of the max. power rating per turbine cap. We also note that there is a change to the planned cable corridor. The project team and their navigation consultants presented this project to the MCA and other key Shipping and Navigation stakeholders on 8th April 2026.

We understand that the applicant intends to submit a s.36 variation request along with a marine license variation application. We would expect the project to carry out a Navigational Risk Assessment as per the current MCA guidance, MGN654. The NRA should be accompanied by a detailed MGN 654 Checklist which can be found at: <https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>

The Environmental Impact Report should supply detail on the possible impact on navigational issues for both commercial and recreational craft, specifically:

- Collision Risk
- Visual intrusion and noise
- Risk Management and Emergency response
- Marking and lighting of site and information to mariners
- Effect on small craft navigational and communication equipment
- The risk to drifting recreational craft in adverse weather or tidal conditions.
- The likely squeeze of small craft into the routes of larger commercial vessels
- Risk controls including those appropriate for deployment of device testing.

As mentioned within Section 14.9.2 we understand the applicant intends to carry out a full MGN-654 complaint traffic survey by visual (CCTV) and AIS from shore-based centre. We note, the applicant also intends to use long term (at least 12 months) AIS data to capture seasonal variations in the vessel traffic patterns. Attention should be given to strategically important lifeline ferry routes and special consideration should be given to the adverse weather routing in the area.

The layout should be planned in such a way to ensure maximum clearance to any vessel navigating through the array area at all states of weather/ tide.

We note that the applicant intends to carry out a cumulative impacts assessment as per Section 14.7 of the scoping report.

Attention should still be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would be willing to accept a 5% reduction in surrounding depths referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore.

We note that the devices planned for the site are subsurface devices drilled on to the seabed. Suitable arrangements should be made to ensure the deployments remain secure to the seabed for the met-ocean conditions expected in the area, with a programme of regular inspection and maintenance of the works in place. If mooring arrangements are being considered for any aspects of the project MCA expects a Third-Party Verification (see HSE/MCA Regulatory expectations guidance on moorings for floating devices) of the mooring arrangements for all floating devices will be required prior to construction to provide assurance that the moorings are suitable for the expected metocean conditions at the location, this will be a part of the marine license conditions.

MGN 654 Annex 4 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) **Order 1a standard**, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Failure to report the survey or conduct it to **Order 1a** might invalidate the Navigational Risk Assessment if it was deemed not fit for purpose. We note from Section 14.9.5 of the scoping report that the applicant intends to use site specific surveys for bathymetry of the study area and this will be used to calculate clearance depths for the Navigation Risk Assessment- we can confirm that this is in line with the MGN 654 Annex 1 methodology document. However, the site-specific bathymetric survey should be compliant with MGN 654 Annex 4 and should be of IHO Order 1a standard. The data should be based on recent survey and the details of this should be included within the NRA preferably as an Annex and the data should be shared with UKHO and MCA.

We are mostly content with Table 14-3. However, we note that within the table there are numerous instances of reference to Under keel Clearance (UKC) reduction from 8m at LAT to 6m at LAT. We would like to point out that it is the reduction in over the blade clearance to sea surface at LAT that is changed from 8m to 6m not UKC. UKC is the depth measured from the keel of the vessel to the seabed or top of the blade (on this occasion). Further we note from the latest Electronic Navigation Chart (ENC) that the charted depth within the extension is 30.9m, therefore for a rotor diameter of 26m and 2m seabed clearance the remaining clearance over the blade to LAT is 2.9m. As noted in the above paragraph we understand that the project intends to use site specific bathymetric surveys for clearance calculations the data must be verified to confirm that the site survey is up to date and of the same standard to the data available on ENCs for this to be considered for clearance calculations. UKC calculations should be complaint with MGN 654 Annex 3 and suitable margin of

safety should be considered for CATZOC allowances. We note from section 14.4.9 that there are occasional transits of vessels with draughts greater than 6m through the site in the East-West direction and detailed assessment of these vessels should be considered. If regular operators are identified, then consultation to microsite device locations may be considered within the NRA. Impact on vessel routeing (including poor weather routeing) should be scoped into the EIA and NRA.

We would recommend the applicant to undertake a Hazard Identification workshop with all relevant navigation stakeholders and regular users in the area. This will help in preparing the Navigation Risk Assessment and Hazard Log. Decisions relating to further risk controls and mitigation measures should be agreed in consultation with other interested parties to determine whether the ALARP status has been met for each risk.

On the understanding that the Shipping and Navigation aspects are undertaken in accordance with MGN 654 and its annexes, along with a completed MGN checklist, MCA is likely to be content with the approach. However, as explained in previous paragraphs the superiority of the site-specific bathymetry survey data over the charted depth needs to be evidenced within the NRA and during consultations for this to be considered over charted depth. If charted depth is used for calculations, we believe the proposed variation will have significant effect on navigation safety for the vessels currently using the inner sound and even for the lifeline ferry service operating in the area.

Yours sincerely
[Redacted]

Navigation Licensing Lead
UK Technical Services - Navigation

NatureScot

Marine Directorate - Licensing and Operations Team

FAO [Redacted]

Scottish Government
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12 August 2026

Our ref: CNS REN TS – Inner Sound

By email only: MD.MarineRenewables@gov.scot

Dear Sir / Madam

SCOP-0075 REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36 CONSENT VARIATION FOR MEYGEN TIDAL STREAM PROJECT – INNER SOUND, PENTLAND FIRTH

Thank you for consulting NatureScot on the scoping report to inform the Environmental Impact Assessment (EIA) and Habitats Regulations (HRA) Screening report for the Section 36 Consent Variation submitted by MeyGen PLC for the MeyGen Tidal Project, and for agreeing to extend the response deadline.

Our advice on the natural heritage interests to be addressed is provided below.

Policy context

Working within the context of a climate emergency and a biodiversity crisis, we seek to provide advice that is enabling and secures the right development in the right place with the most benefit for climate change reduction and that which avoids damage, and where possible, achieves enhancement and restoration of biodiversity.

As a statutory consultee, NatureScot works in support of the Scottish Government's vision for a Blue Economy with its six outcomes acting as focal points to ensure the marine environment supports ecosystem health, improved livelihoods, economic prosperity, social inclusion and wellbeing. We provide advice in the absence of an up-to-date policy for tidal stream but in the spirit of Scottish Government's ambition and its aims to balance the promotion of the sustainable development of offshore renewable energy, whilst protecting and restoring our biodiversity.

Proposal

This scoping report relates to a Section 36 Variation to the existing 2013 S36 Consent and 2014 Marine Licence, the consent variation proposes:

- Reduction in the area of the original consent and changes to the array area in which the tidal turbines will be installed
- An increase and change to the cable corridor spatial extent
- A reduction from 61– 34 turbines
- An increase in rotor diameter from 16-20m – 16-26m
 - Associated increase in rotor swept area per turbine from 201 – 314m² per turbine to 201 – 531m²
 - Associated reduction in the minimum clearance of the turbine rotors to seabed from 4.5m to 2m
 - Associated reduction in the minimum clearance of the turbine rotors to sea surface at Lowest Astronomical Tide (LAT) from 8m to 6m
- An increase in cable voltage for new cables (four already installed as part of Phase 1A) from 6.6kV to 12kV; and
- A removal on the cap on individual turbine rates power.

The operational lifetime of the project is expected to be approximately 30 years with discrete installed stages having operating durations of between 15 and 20 years within a UK CfD framework.

There is no requirement for any associated changes to terrestrial works so there is no associated requirement for terrestrial planning consent variations.

Content of the Scoping Report and EIA Report

We note and agree with the following topic areas that fall within our remit being scoped out:

- Physical and coastal processes
- Seascape, Landscape and Visual Impacts
- Recreation, as part of Socio-economic, tourism and recreation.

We disagree with some aspects of receptors in topics being scoped out at this stage and provide further advice under the receptor topic areas below.

We welcome the outline in Section 23 of the proposed structure of the EIA Report including technical appendices which will accompany and support the EIA Report. We would welcome further dialogue on the development of Collision Risk Modelling for marine mammals and marine birds as well as the approach to underwater noise modelling. Whilst some detail is provided in the scoping report, our experience to date is that it is post scoping and during the development of collision risk modelling that further dialogue is required to agree approaches and avoid assumptions when issues arise during modelling.

Assessment approach

We welcome the approach to pre scoping workshops earlier this year and those meetings have helped to inform the assessment approach proposed in the scoping report.

As this is scoping for a proposed variation and not for a new consent or marine licence application, the intention is for the EIA to focus on the aspects of the proposed variation which have the potential to result in new or materially different effects compared to those assessed within the ES (2012) prepared to support the previous application and consent. We also highlight that knowledge / assessment techniques / approaches have moved on since 2012.

We note the consideration given to the existing Phase 1A project which includes four operating turbines in each of the receptor topics, as to whether it is to be considered as part of the baseline or included as part of a worst-case scenario and provide advice accordingly.

Climate change and carbon costs

The impact of climate change effects should be considered, both in futureproofing the project design, as well as information on how certain climate stressors may work in combination with potential effects from the proposed tidal array. The EIA Report should also consider the carbon cost of the development (including supply chain) and to what extent this is offset through the production of green energy.

We note that there is no mention of a blue carbon assessment, this should be considered and ruled out due to the proposed activities and benthic habitats not likely to cause disturbance and therefore release of blue carbon.

Habitats Regulations Appraisal (HRA) Screening Report

An HRA Stage 1 LSE screening report has been provided alongside the EIA scoping report. Our advice on the HRA screening report is provided below in Appendix F.

Positive effects for biodiversity and nature inclusive design

We recommend consideration of positive effects for biodiversity as well as nature inclusive design aspects at an early stage. We acknowledge that, whilst not currently policy within the marine environment, these aspects form part of the ability to address both the climate and biodiversity crises and as such we encourage applicants to consider this as part of their application.

Mitigation and Monitoring

The intention to adopt embedded mitigation measures is welcomed. Mitigation measures can often be most successful when they are considered from the outset of the project rather than as a late-stage solution. Therefore, in some cases, mitigation can be incorporated as designed in measures that are truly embedded to avoid / reduce impacts.

Please note the EIA Report must clearly articulate those mitigation measures that are embedded and relied upon for the purposes of the assessment and those that are informed by the EIA (or HRA) and are necessary to avoid or reduce predicted significant adverse environmental effects.

Tidal stream development is still a relatively new industry in Scottish / UK waters. There are still knowledge gaps or uncertainty in the interactions of natural heritage receptors with tidal stream arrays. We encourage monitoring that will seek to reduce uncertainty and or increase our understanding to this and other tidal stream projects.

Natural Heritage interests to be considered

We provide advice as detailed below within receptor-specific technical appendices for key natural heritage interests to be considered in the EIA Report:

- Advice on marine physical and coastal processes is provided in **Appendix A**
- Advice on benthic ecology is provided in **Appendix B**
- Advice on marine mammals and megafauna is provided in **Appendix C**
- Advice on ornithology is provided in **Appendix D**
- Advice on fish and shellfish ecology is provided in **Appendix E**
- Advice on HRA screening report in **Appendix F**

Further information and advice

We hope this advice is of assistance to help inform the scoping opinion, noting that there may be aspects where some further engagement is required to assist in undertaking the EIA.

For any further advice, please contact our marine energy mailbox – marineenergy@nature.scot .

Yours faithfully,

[Redacted]

Head of Marine Energy – Sustainable Coasts and Seas

Appendix A - MEYGEN TIDAL ARRAY - MARINE PHYSICAL AND COASTAL PROCESSES (Section 8)

A.1 Approach

We note and agree that the study area for this topic is 10km from the proposed array area.

A comparative assessment has been undertaken to inform this scoping exercise. This has considered the original numerical modelling, alongside more recent supplementary modelling taking account of the revised Project Design Envelope. The conclusions indicating that the previous modelling was overly conservative whilst the new project parameters are expected to also reduce the magnitude and spatial extent of effect.

The comparative assessment has concluded that with the revised Project Design Envelope, the result of the modelling indicates that all impact pathways are either equal to or less than those assessed in the 2011 consent. For this reason, they propose scoping out this topic from the EIA.

The scoping report indicates a Water Framework Directive Assessment will be conducted - we have reviewed the proposed approach and whilst we have no direct experience of such an assessment, what is proposed appears acceptable. SEPA should also be approached for their views.

In terms of cumulative considerations, we agree that currently there are no projects at a stage that can be taken further into a cumulative assessment and we do not consider there to be any transboundary implications.

We support the overall approach to marine and coastal physical processes and agree with the conclusion that this receptor topic can be scoped out.

A.2 Mitigation and Monitoring

We welcome the commitment to an operational control whereby tidal turbines will not operate when significant wave height exceeds 3.5m to limit the effects of wave attenuation during storm events.

A.3 Scoping Report Questions

1. *Do you agree with the study area that has been identified for marine and coastal processes? Yes.*
2. *Do you agree that the baseline data sources identified are sufficient to adequately characterise the marine and coastal processes? Yes.*
3. *Do you agree that all impacts/ pathways/ effects that could arise from all stages of the Proposed Variation have been identified for marine and coastal processes? Yes.*
4. *Do you agree that transboundary impacts for marine and coastal processes may be scoped out of the EIA? Yes.*
5. *Do you agree on the suitability of proposed embedded mitigation of relevance to marine and coastal processes that have been identified for the Proposed Variation? See comment above re operational cut off during storm events.*

6. *Do you agree that a WFD Compliance Assessment is a requirement?* We think it will be helpful, but advice should be sought from MD SEDD and/ or SEPA as to it being a requirement.

Appendix B - MEYGEN TIDAL ARRAY - BENTHIC ECOLOGY (Section 9)

We note and agree that the study area for this topic is a 10km buffer from the proposed array area, as identified and informed from the modelling for Marine and Coastal Processes.

As part of the 2012 ES, site specific surveys were undertaken or results utilised from other surveys carried out by Marine Directorate, we support the proposed drop-down video survey to ground truth and verify the previous 2010 surveys to be carried out this year, to inform and support the application

Whilst certain biotopes have been recorded in the Array Area that are indicative of Annex 1 rocky reef, it is considered that details on siting of either turbines or cables can be undertaken to minimise any potential impacts and this should be addressed further in draft project commitments within the EIA Report.

We advise since the ES (2012) was undertaken, more prominence and consideration should be given to both Priority Marine Features and marine Invasive Non-Native Species. Checking NMPI layers should inform if there is a likelihood of PMF habitats within the array area and/or the export cable corridor. The assessment should consider whether or not the proposal is likely to have a significant impact on any PMF. Guidance is available on our website¹. The mINNS management plan should be reviewed and updated where necessary from the Phase 1A project, taking into account:

- Marine Biosecurity Planning Guidance for producing site and operation-based plans for preventing the introduction of non-native species
- Marine biosecurity planning – Identification of best practice: A review: NatureScot Commissioned Report No. 748.
- If mINNS are found within the project area, the results of surveys must be shared with NatureScot (ENQUIRIES@Nature.scot) and Marine Directorate (MarineNonNativeSpecies@gov.scot). All non-native species found should be logged via [iRecord](#).
- A recent report by SAMS, commissioned by the Offshore Wind Directorate on 'Invasive non-native species mitigation measures for offshore renewables' is soon to be published. We recommend reviewing this and updating the biosecurity/ mINNS mitigation plan as appropriate, as new knowledge and good practices emerge.

We recommend when assessing the proposals impacts on PMF's, the developer considers the Feature Activity Sensitivity Tool (FeAST)² and Marine Evidence based Sensitivity Assessment (MarESA)³ as well as considering wider literature.

We do not support the justification provided for scoping out EMF effects. For "electromagnetic changes" or EMF, we would usually expect further consideration of this impact on electro-magnetic sensitive species, e.g. skates, rays, etc., to inform the assessment, and consideration

¹ <https://www.nature.scot/professional-advice/protected-areas-and-species/priority-marine-features-scotlands-seas>

² <https://feature-activity-sensitivity-tool.scot/>

³ https://www.marlin.ac.uk/sensitivity/sensitivity_rationale

should also be given to EMF cumulatively. As a topic area, EMF merits further consideration in the EIA Report.

Work undertaken by the Offshore Wind Energy and Change Programme (OWEC) funded Floating Offshore Wind Environmental Response to Stressors (FLOWERS) project may have pertinent information to consider in respect of EMF effects from subsea cables –

<https://www.thecrownestate.co.uk/news/the-crown-estate-and-cefas-advance-understanding-of-interactions-between>.

In terms of cumulative considerations, we agree that currently there are no projects at a stage that can be taken further into a cumulative assessment and we do not consider there to be any transboundary implications.

We support the overall approach to benthic considerations and agree, with the exceptions noted above, with the conclusions recached in Table 9.5.

B.1 Monitoring and Mitigation.

It will be helpful to consider the impacts to benthic interests further based on pre-construction surveys if the proposal is consented.

B.2 Scoping Report Questions

1. *Do you agree with the data sources, including project specific surveys, to be used to characterise the benthic ecology baseline within the EIA? Yes*
2. *Do you agree that all pathways, receptors and potential impacts have been identified for benthic ecology? Yes*
3. *Do you agree with the impacts which have been scoped out of the EIA for benthic ecology? See comments above.*
4. *Do you agree that transboundary impacts for benthic ecology may be scoped out of the EIA? Yes.*
5. *Do you agree on the suitability of proposed embedded mitigation of relevance to benthic ecology that have been identified for the Proposed Variation? Yes, noting that further commitments should be considered including nature inclusive design of any cable protection measures as well as prep construction surveys to support micro- siting to avoid any sensitive areas of Annex 1 habitats.*
6. *Do you agree that no additional site-specific surveys for benthic ecology will be required (other than those described in Section 9.9) to inform the Proposed Variation? Yes, we support that further drop-down video survey is occurring this year to deliver additional spatial coverage and enable verification the 2011 baseline.*
7. *Do you agree with the proposed methodology for the consideration of cumulative effects for benthic ecology? We advise that all relevant regulators are contacted for agreement on other projects that may be required to be considered as part of a cumulative assessment.*

Appendix C - MEYGEN TIDAL ARRAY - MARINE MAMMALS, TURTLES AND OTTER (Section 10)

C.1 Study Area

We note a 50km study area has been identified for the consideration of inclusion or otherwise in the assessment of marine mammals and other marine species including otter, and turtle species.

C.2 Baseline

We recommend these additional data sources to be considered as part of the assessment:

1. Morris et al., (2026): NatureScot Research Report 1421 - Aerial surveys of seals in Scotland during the harbour seal moult, 2021-2025: <https://www.nature.scot/doc/naturescot-research-report-1421-aerial-surveys-seals-scotland-during-harbour-seal-moult-2021-2025>
2. Carter et al., (2026): At-sea distribution of seals on the Northwest European Shelf: Towards transboundary conservation and management. *Journal of Applied Ecology*, 63, e70236. <https://doi.org/10.1111/1365-2664.70236>
3. Gilles et al., (2025): Spatial models of cetacean density in European Atlantic waters based on SCANS-IV summer 2022 survey data*: https://www.tiho-hannover.de/fileadmin/57_79_terr_aqua_Wildtierforschung/79_Buesum/downloads/Berichte/SCANS-IV_Modelling_Report_final_20250514.pdf

*Gilles et al., (2025) was referred to by the applicant at the Scoping Workshop in April 2026, and while it has been cited in Paragraph 10.6.1 of the Scoping Report, it has not been included in Table 10-1, nor in the final reference list. We assume this to be an oversight as opposed to an exclusion of this source.

We note no project specific surveys for marine mammals have been proposed to inform the application. There is a reliance on existing literature / survey sources and or in a non-dedicated qualitative manner from the UAV surveys. Marine mammal data recorded following this approach are unlikely to be of sufficient quality to be effectively incorporated in the EIA Report.

We reiterate previous discussions with the developer to improve the quality of marine mammal data collected by the project. This includes the consideration of drone surveys of surrounding seal haul outs.

Grey and harbour seals values presented for the North Coast and Orkney SMA are correct as of SCOS (2025), which uses survey data collected in 2019 for both species. More recent count data, collected in 2025, has now been published as part of Morris et al., (2026) and we would expect these values to be used.

SCOS (2026) is presently being finalised and if available, we would also expect for its outputs to be integrated into future stages of this Application. We are expecting reductions in the Potential Biological Removal rates (PBR) for both grey and harbour seals in the North Coast and Orkney SMA and where possible these revised rates should be used in the assessment.

At-sea population densities based on Carter et al., (2025) are provided in paragraph 10.4.18. We request the applicant to ensure that like-for-like density values are used in the assessment and to specify whether values used are absolute, or relative density.

We welcome the inclusion of coastal bottlenose dolphin, Risso's dolphin, orca and white-beaked dolphin in the Scoping Report following NatureScot advice provided during the Scoping Workshop in April 2026. These are in addition to harbour porpoise, minke whale, grey seal and harbour seal. Descriptions, densities and abundance values for cetaceans and pinnipeds are correct as of the latest available evidence.

We note the incorporation of the Orkney & Northeast Scotland Photo ID Catalogue for Risso's dolphin and the Scottish Killer Whale ID Catalogue in the baseline characterisation provided for these species. In both these cases, we would remind the applicant to either present clear evidence that only a sub-portion of the catalogue populations use the study area surrounding the Proposed Variation area or apply the whole catalogue population numbers for assessments for the species

No further species have been included for consideration in the Scoping Report based on these sources, however based on our own review of the above data sources, we advise that **common dolphin, long-finned pilot whale and humpback whale** are included for assessment. This is based on:

1. The HWDT sightings map shows at least 30 recordings of **common dolphin** ranging from 3 - 46 individuals (2017 to as recently as June 2026) within the 50km buffer zone. Further sightings of common dolphin are recorded within ORCA's Whale and Dolphin Sightings map and within WDC ShoreWatch sightings data (NBN Atlas, 2024).
2. Given recent seasonal **long-finned pilot-whale** presence within the 50km buffer area (e.g. SMASS), as well as recordings from WDC ShoreWatch (NBN Atlas, 2010-2017).
3. **Humpback whale** have also been sighted in the Pentland Firth in various years and months across HWDT, WDC and ORCA data sets. Sightings in Scottish waters are generally considered to be increasing, and they are now considered as 'regularly occurring'.

During the April 2026 Scoping Workshop, we advised that additional data sources including (but not limited to) HWDT Whale Track, ORCA and ShoreWatch could also be used to check for other marine mammal species that may also benefit from inclusion at this stage.

C.3 Impact Pathways

Table 1-1 presents a high-level summary of the impacts to be scoped into the EIA Report under the various topics including marine mammals, and a more detailed overview of the exercise undertaken is presented in Table 10-3. The impact pathways follow NatureScot advice provided during the Scoping Workshop in April 2026, and overall, we largely agree with the impact pathways to be scoped in for the phases of construction, operations and maintenance and decommissioning phases of the development in Table 1-1, Table 10-3 and in Table 4-3 of the HRA Screening Report.

We note on page 10-27 that impact pathways MM-16, MM-17 and MM-18 are listed, however no detail of what these pathways are is provided.

We largely agree with the range of impact pathways scoped out with one exception:

- MM-13: Physical barrier to movement during operations and maintenance.

We advised at the April 2026 scoping workshop to scope in the potential impact of a barrier effect (MM-13) across all phases of the development for marine mammals. Noting that this has been included in the HRA Screening report for the operation and maintenance phase, presumably for seal species only. We disagree with the justification statement that “*the revised PDE represents a reduction in the magnitude of impacts*”. Although there is a reduction in the number of turbines in the Proposed Variation, there is an increase in turbine diameter and a reduction in the distance between the blade tip and the seabed/LAT. We do not yet have sufficient knowledge of small scale / large scale avoidance (displacement) and/ or barrier effects that may be caused by a tidal stream array.

We agree that marine turtles are considered to be rare/occasional visitors in Scottish waters and these can be scoped out of further assessment in the EIA Report.

We agree that otters can be scoped out of further assessment in the EIA Report.

C.4 Assessment Approach

C.4.1 Collision Risk

We agree with the assessment proposed that it will implement the NatureScot (2016) CRM approach for the four original listed species scoped in (harbour seal, grey seal, minke whale & harbour porpoise). We advise a qualitative assessment for all other marine mammal species.

We are aware of discussions around the approach to collision risk e.g. Tidal Industry Seal Project (TISP) and we advise further discussion and agreement on assumptions and preliminary results prior to the submission of the application. Depending on results, we may advise on the need for the submission of a ‘without prejudice’ derogation case for harbour seal with the preliminary identification of compensation measures.

C.4.2 Underwater Noise

We agree with the assessment methodology detailed in paragraphs 10.9.4-5, and the approach to the assessment of construction noise detailed in paragraph 10.9.6. Given that drilling is the planned construction method for installing the AR3000 devices, we anticipate drilling to be included in a qualitative assessment of continuous sound sources, and activities such as UXO clearance to be included in propagation modelling of high-amplitude impulsive sounds. We agree with the use of NFMS (2024) thresholds for auditory injury against NMFS (2005) Level B harassment thresholds for acoustic disturbance.

C.5 Cumulative Impacts

The CEA will consider the ‘realistic worse case’ scenario for projects with potentially relevant effects. We consider further description / discussion is required around what this will entail and the need for agreement on this in advance of application submission, this should include what other projects / development are to be included.

It is also proposed to consider the four currently existing turbines as part of the environmental baseline and hence consider effects arising from the Proposed Variation only. We disagree that the existing four turbines should be considered as part of the baseline and recommend that the CEA should present two scenarios both with and without the inclusion of the existing four turbines.

We agree that there are unlikely to be any transboundary / cross border effects for marine mammals and this can be scoped out.

C.6 Mitigation and Monitoring

We would expect to see a Marine Mammal Mitigation Plan submitted for the pre-construction and construction periods of this proposal.

Marine mammal monitoring of a more quantitative nature should be further considered for the operational phase and agreed if the project is consented and preliminary suggestions as to the scope and duration of such surveys should be included in the EIA Report.

C.7 Scoping Questions

1. *Do you agree with the data sources, including project specific surveys, to be used to characterise the marine mammals baseline within the EIA?* See comments above.
2. *Do you agree that all pathways, receptors and potential impacts have been identified for marine mammals?* See comments above.
3. *Do you agree with the impacts which have been scoped out of the EIA for marine mammals?* See comments above.
4. *Do you agree that transboundary impacts for marine mammals may not be scoped out of the EIA?* Yes
5. *Do you agree on the suitability of proposed embedded mitigation of relevance to marine mammals that have been identified for the Proposed Variation?* We provide additional comments on this above.
6. *Do you agree that no site-specific surveys for marine mammals will be required to inform the Proposed Variation?* It is disappointing that no site-specific surveys are proposed.
7. *Do you agree with the proposed methodology for the consideration of cumulative effects for marine mammals?* See comments above about the inclusion the existing four turbines within the baseline.

Appendix D - MEYGEN TIDAL ARRAY – ORNITHOLOGY (Section 11)

The proposed array area lies within North Caithness Cliffs Special Protection Area (SPA).

We note the intention to use a combination of desk-based review of relevant data, existing site-specific data as well as commissioned site-specific UAV bird surveys to inform the baseline, the focus of which should be on diving species due to the potential for collision risk - auks, divers, shag and cormorant.

We provided advice on the methodology for the UAV surveys but have not yet seen any results and we also note that there are other count results due later this year of North Caithness Cliffs SPA commissioned by NEEOG (offshore wind collaborative group) in 2025. These survey results should be used to inform the assessment.

For the application, we will require all survey information to be presented - including total bird numbers, birds flying and birds on the water for all species. We will also require clear justification for any decisions which exclude data in calculating densities.

Furthermore, we will expect details of how distance correction has been calculated and how availability bias has been accounted for. For further advice in relation to these issues, we recommend consulting our guidance note on 'Assessing collision risk between underwater turbines and marine wildlife'. A clear and detailed description of any analyses undertaken should be presented in the EIA.

We advise that the Woodward *et al.* 2019 Mean Max +1 standard deviation foraging ranges are used to determine connectivity for both the EIA and HRA. We also advise that, due to the location of the proposal, there will be exceptions to the Woodward *et al.* 2019 foraging ranges as detailed in our guidance notes- these have been extracted into Annex A below. We also acknowledge the consideration being given to the apportioning process given the proposed array area lying within the North Caithness Cliffs SPA.

Further advice on connectivity and sites / species to be considered under HRA is provided in **Appendix F.**

We note that underwater collision risk modelling (CRM) will be carried out for the four breeding auk species (puffin, black and common guillemot, razorbill, European shag and gannet). We would advise that in addition to these species we would expect that great cormorant, red-throated and great northern diver are included in the CRM if they are detected in significant numbers in the ongoing site-specific survey. We also wish to understand which method and model of collision risk modelling will be undertaken.

We advise for cumulative effects, consideration should be given to consented offshore windfarms, including Pentland Firth – Highland Wind and West of Orkney, where predicted impacts to species being taken through CRM are identified, whether from offshore wind or underwater tidal stream collisions. Further discussion may be required around the approaches to be taken for CRM.

We agree that transboundary impacts will not be significant, and we do not require these to be considered / included in the EIA Report.

D.1 Mitigation and Monitoring

General embedded mitigation is presented in Section 11.3. However, no mitigation or monitoring other than for vessel disturbance of inspections of turbines (secondary entanglement) has been proposed in relation to ornithology. Further consideration of monitoring in respect of marine birds interactions with tidal turbines should be provided in the EIA Report.

D.2 Cumulative Effects

We note the approach proposed in Section 11.7, however we advise to date there is not as yet fully finalised seabird compensation plans so further discussion may be required in respect of how to take account of predicted offshore windfarm impacts both those required to be compensated for and those that require mitigation only.

D.3 Scoping Questions

1. *Do you agree with the data sources, including project specific surveys, to be used to characterise the ornithology baseline within the EIA? See comments above.*
2. *Do you agree that all pathways, receptors and potential impacts have been identified for ornithology? Yes*
3. *Do you agree with the impacts which have been scoped out of the EIA for ornithology? Yes*
4. *Do you agree that transboundary impacts for ornithology may not be scoped out of the EIA? Yes*
5. *Do you agree on the suitability of proposed embedded mitigation of relevance to ornithology that have been identified for the Proposed Variation? See comments above.*
6. *Do you agree that no site-specific surveys for ornithology will be required to inform the Proposed Variation? See comments above about UAV surveys.*
7. *Do you agree with the proposed methodology for the consideration of cumulative effects for ornithology? See comments above.*

D.4 Annex A - Guidance on assessing connectivity to seabird colony SPAs

We advise mean max + 1SD from Woodward et al (2019) should be used to screen in connectivity to colony SPAs with the following exceptions:

1. Tracking on Fair Isle showed foraging distances are greater than those of all other colonies for both common **guillemot and razorbill**. This may relate to poor prey availability during the study. However, trends for seabirds in the Northern Isles indicate this may be becoming a more frequent occurrence. We therefore recommend for common guillemot and razorbill:
 - Use of mean max+1SD, including data from Fair Isle for all **Northern Isles** designated sites.
 - For all designated sites south of the Pentland Firth (i.e. excluding the Northern Isles) use of mean max+1SD discounting Fair Isle values.
2. For **gannet** we recommend using mean max +1SD for all colonies without site specific maximum values. However, for the SPA colonies where site specific evidence exceeds this value (509.4km), namely:
 - Forth Islands (Bass Rock),
 - Grassholm and
 - St Kilda

then the site-specific maximum should also be used.
3. For species with insufficient data to calculate mean max +1SD then the closest metric is to be used in the following order of preference:
 - Mean Max (MM),
 - Max,
 - Mean.

Specifically, the exceptions for gannet, guillemot and razorbill are:

Species	Exception Applied	Recommended Foraging Range (km)	Metric
Northern gannet	Forth Islands SPA	590	Max
	Grassholm SPA	516.7	Max
	St Kilda SPA	709	Max
Common guillemot	All Northern Isles SPAs	153.7	MM+SD
Razorbill	All Northern Isles SPAs	164.6	MM+SD

Appendix E - MEYGEN TIDAL ARRAY - FISH AND SHELLFISH ECOLOGY (Section 12)

A 10 km study area is proposed for fish and shellfish from the proposed array area, based on the updated hydrodynamic modelling.

No site-specific surveys are planned for fish and shellfish, although the previous benthic sampling combined with existing data sources has been used to inform likelihood of presence of suitable habitats for spawning /nursery etc. noting that the proposed array areas is unlikely to be suitable for the spawning / nursery habitats for herring or sandeel habitat. We accept this approach.

Please note use of the term common skate complex is no longer considered appropriate and instead should be referenced as flapper skate *Dipturus intermedius* and blue skate *D. flossada*.

Table 12.6 lists the various impact pathways proposed to be scoped in/out of the assessment. We broadly accept the impacts to be scoped in, noting our comments below.

For “electromagnetic changes” or EMF, we would usually expect consideration of modelling to inform the assessment, and consideration should also be given to EMF cumulatively. As an emerging topic area, EMF merits further consideration in the EIA Report. Work undertaken by the Offshore Wind Energy and Change Programme (OWEC) funded Floating Offshore Wind Environmental Response to Stressors (FLOWERS) project may have pertinent information to consider in respect of EMF effects from subsea cables –

<https://www.thecrownestate.co.uk/news/the-crown-estate-and-cefas-advance-understanding-of-interactions-between>.

Collision risk and quantification Atlantic Salmon, Marine Directorate have been undertaking further tracking surveys of Atlantic salmon including within the Pentland Firth. We note that no quantification of collision for either adult salmon or smolts is to be undertaken. Further consideration of this and inclusion of data from previous monitoring of the operational turbines should be provided to further justify this approach. Advice should also be sought from MD SEDD.

See our advice in Appendix B for recommendations regarding mINNS and the management / biosecurity plan.

For basking shark, we highlight that any mitigation should mirror that of marine mammals.

For diadromous fish, we advise consideration of impacts under EIA and not HRA. It is impossible at this stage to assign fish to natal rivers to facilitate a quantitative assessment to inform consideration of the conservation objectives.

E.1 Scoping Questions

1. Do you agree with the study area defined in Section 12.3 for fish and shellfish ecology? Yes
2. Do you agree with the data sources listed to be used to characterise the fish and shellfish baseline within the EIA? Yes
3. Are there any additional data sources or guidance documents that should be considered?
No

4. *Do you agree that no site-specific surveys for fish and shellfish will be required to inform the Proposed Variation?* Yes, but see comments above on provision of monitoring results from the operational turbines monitoring.
5. *Do you agree that all receptors have been identified for fish and shellfish?* Yes
6. *Do you agree all potential impacts and impact pathways have been identified in relation to fish and shellfish?* See comments above.
7. *Do you agree with the impacts which have been scoped out of the EIA for fish and shellfish?* See comments above.
8. *Do you agree on the suitability of proposed embedded mitigation relevant to fish and shellfish has been identified for the Proposed Variation?* We recommend further consideration of potential nature inclusive design, particularly for any cable protection.
9. *Do you agree with the proposed assessment methodology for the consideration of cumulative effects for fish and shellfish?* Yes
10. *Do you agree that transboundary impacts for fish and shellfish may be scoped out of the EIA?* Yes
11. *Do you agree with the proposed assessment methodology for fish and shellfish ecology?* See comments above.

Appendix F - HRA Screening Report

F.1 Marine and Coastal Processes / Benthic Ecology

We agree with the conclusions reached that there is no potential LSE identified due to no Special Areas of Conservation in the Zone of Influence of the proposed development.

F.2 Diadromous fish

Diadromous fish are not discussed in the Screening Report, and we advise that potential impacts to diadromous fish should be assessed through EIA and not through the HRA. (Noting that as more tracking studies results become available it may be that consideration of Atlantic Salmon may fall back under HRA for future proposals). See our EIA Report comments above for further advice.

F.3 Marine mammals

We disagree that the Moray Firth SAC Bottlenose dolphin feature can be screened out at this stage, this is due to frequent records in the Pentland Firth of bottlenose dolphin with Photo ID matches to this SAC population.

We agree that the Southern North Sea SAC and the Hebrides and the Minch SAC can be screened out for harbour porpoise feature.

For grey seal, whilst we note and agree with the argument for screening out grey seal from the Faray and Holm of Faray SAC, we consider this species should be assessed within the EIA Report. Particularly as there are number of local haul-out sites for grey seal and they have been observed in the local vicinity of the operational turbines in array area.

We disagree that the harbour seal feature of Sanday SAC can be screened out, despite the arguments which consider the distance and habitat preference modelling (Carter et al 2022), indicating their presence in the array area unlikely. The array area is just outside of the foraging range (50km) of harbour seal from this SAC, but given ongoing declines in the population and the likelihood of foraging distances increasing for this population, we advise further consideration should be given to this species as part of a RIAA.

We support the conclusion no LSE for otter from Caithness and Sutherland SAC, noting that otters may well be in the coastal environment and should be considered in the EIA Report.

F.4 Ornithology

The proposal lies within the North Caithness Cliffs Special Protection Area (SPA). It is also within foraging range of seabirds / sea ducks/ grebes and divers from the following SPAs:

Hoy SPA, Scapa Flow SPA, East Caithness Cliffs SPA, Copinsay SPA, North Orkney SPA, Auskerry SPA, Marwick Head SPA, Rousay SPA, Calf of Eday SPA, West Westray SPA, Sule Skerry and Sule Stack SPA, Cape Wrath SPA, Troup, Pennan and Lions Head SPA, Fair Isle SPA, Seas of Foula SPA, North Rona and Sula Sgeir SPA, Foula SPA, Mousa SPA, Priest Island (Summer Isles) SPA, Noss SPA.

The qualifying interests which should be considered and taken forward and assessed include:

- Common guillemot
- Razorbill

- Atlantic puffin
- European shag
- Great cormorant
- Northern gannet
- Red throated diver
- Great northern diver
- Black throated diver
- Slavonian Grebe
- Long tailed duck
- Red-breasted merganser
- Velvet scoter
- European storm petrel
- Leach's storm petrel

This list of species should be compared against any site-specific UAV survey results.

We support the designated sites and species to be taken forward into a Report to Inform an Appropriate Assessment as outlined in Tables 6.2 and 6.3.

We note the approach to be taken for apportioning, which means that birds observed within the array area are anticipated to originate mainly from the North Caithness Cliffs SPA. We also welcome the intention - to further refine the approach to be taken in the RIAA is developed alongside the EIA Report.

For a number of the SPAs a conclusion of 'potential LSE cannot be ruled out' for a breeding seabird species but the conclusion for the breeding seabird assemblage is 'no potential for LSE'. We advise that for those SPAs which have a seabird assemblage feature, where LSE is concluded for at least one named species of the assemblage, then that is the conclusion for the assemblage feature.

F.4.1 In-combination

We broadly agree with the approach to the in-combination assessment as described in Section 8.1. We advise that a full list of projects proposed to be included within the in-combination assessment (and cumulative assessment for the EIA) should be agreed in advance of application submission.

Northern Lighthouse Board



Northern Lighthouse Board

84 George Street
Edinburgh EH2 3DA

Tel: 0131 473 3100
Fax: 0131 220 2093

Website: www.nlb.org.uk
Email: enquiries@nlb.org.uk

Your Ref: MD SCOP-0075
Our Ref: AL/OPS/ML/TIDE_004_26

Licensing Operations Team – Marine Directorate
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

22 July 2026

REGULATION 14 OF THE MARINE WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

REGULATION 12 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

SCOP-0075 – MEYGEN PLC – MEYGEN TIDAL PROJECT – INNER SOUND, PENTLAND FIRTH

Thank you for your e-mail correspondence dated 25th June 2026 relating to the Scoping Report submitted by **MeyGen PLC** for a variation to the existing Section 36 consent for the site. It is noted that this variation request includes an increase in capacity of up to 100MW for the site, a reduction from a proposed 61 to 34 turbines, and an increase in rotor size, with an associated decrease in surface clearance from 8m to 6m.

Northern Lighthouse Board acknowledge the inclusion of Chapter 14 (Shipping and Navigation) within the report, and note the topics that will be scoped in to the full EIA report. NLB also recognise commitment (COM-12) to further develop the v-AIS AtoN network around the expanded site, and will continue to work with MeyGen to develop the capability.

In response to the questions posed within Section 14.10, NLB have no objection to the content proposed within the Scoping Report, and no suggestions for additional topics.

Yours sincerely

[Redacted]

NLB respects your privacy and is committed to protecting your personal data.
To find out more, please see our Privacy Notice at www.nlb.org.uk/legal-notice/

Orkney Islands Council

From: [Redacted]
To: [MD Marine Renewables](#)
Subject: Re: MeyGen PLC - MeyGen Tidal Project – Inner Sound, Pentland Firth - Consultation on Request for EIA Scoping Opinion and HRA Screening Opinion - Response required by 25 July 2026
Date: 10 July 2026 14:59:23
Attachments: [image003.png](#)

Classification: NOT PROTECTIVELY MARKED

Hi,

Thank you for consulting OIC Marine Planning. We would like to highlight the importance for the applicant to consult with Pentland Ferries due to the development taking place in very close proximity to the operational ferry route, particularly due to the reduced distance between the tidal devices and water surface. Consultation should also take place with the Orkney Fishing Association due to the alteration to the devices locations in an area that may be fished. It is welcome that both organisations have been identified on the list of stakeholders anticipated to be included (14.9.4).

At this stage we have no further comments to add to the Scoping Report.

Best regards,
[Redacted]

| Marine Planner
Development and Marine Planning | Planning and Regulatory Services
Infrastructure and Organisational Development | Orkney Islands Council
01856 873535 ex 2131 | [Redacted] [OIC Marine Planning](#)

Scottish Fishermen's Federation

From: [Redacted]
To:
Cc:
Subject: Re: MeyGen PLC - MeyGen Tidal Project – Inner Sound, Pentland Firth - Consultation on Request for EIA Scoping Opinion and HRA Screening Opinion - Response required by 25 July 2026
Date: 23 July 2026 15:00:58
Attachments: [image003.png](#)
[image.png](#)

To the Licensing Operations Team,

Please find below the Scottish Fishermen's Federation (SFF) response to the consultation on the Request for an Environmental Impact Assessment Scoping Opinion and Habitats Regulations Appraisal Screening Opinion for the proposed MeyGen Tidal Project variation application (SCOP-0075). SFF understands that the current consultation relates to the scope of the Environmental Impact Assessment that will accompany a future Section 36 Consent and Marine Licence variation application rather than the variation application itself. The comments below therefore relate to the proposed scope and methodology of the assessment.

SFF has reviewed the chapter specific scoping questions presented within the Scoping Report. The comments below highlight those aspects of the proposed scope and methodology where SFF considers further clarification or assessment may be beneficial.

SFF considers that Commercial Fisheries and Shipping & Navigation should remain scoped into the EIA.

In relation to the Commercial Fisheries assessment, SFF notes the reliance on AIS, VMS and other desk based datasets. While these provide useful information, the EIA should acknowledge the limitations of such datasets and ensure that contemporary fishing activity and vessel use of the area are validated through engagement with the fishing industry.

While SFF recognises the rationale for adopting a proportionate assessment informed by the 2012 Environmental Statement, the EIAR should clearly demonstrate that current fisheries activity, vessel movements and navigation patterns remain adequately represented by the available evidence base.

SFF understands from discussions with fishermen, including operators active from Peterhead, that the Inner Sound continues to be used as a fishing vessel transit route. The EIA should therefore consider route dependency, operational importance and navigational function, rather than relying solely on traffic density or vessel count data. Consideration should be given to factors influencing route selection, including weather conditions, tides, navigational constraints and vessel characteristics. A route may be used by a relatively small number of vessels but nevertheless remain operationally important to those vessels and should therefore not be discounted solely on the basis of traffic frequency. In addition, the continued availability of safe navigation routes should be treated as a fundamental consideration within the assessment. The importance of a route should be evaluated not only by reference to vessel numbers, but also by the role it plays in facilitating safe passage under varying weather, tidal and operational conditions.

SFF has no further comments on the HRA Screening Report at this stage.

Should you require any clarification on the points raised, please do not hesitate to contact me.

Regards,
[Redacted]

[Redacted]

Offshore Consents Assessments Manager

Scottish Fishermen's Federation

24 Rubislaw Terrace | Aberdeen | AB10 1XE

T: +44 (0) 1224 039088 | [Redacted]

E: [Redacted] | sff.co.uk

Follow us: [Facebook](#) | [Twitter](#)



Registered Address | Scottish Fishermen's Federation (SFF) | 24 Rubislaw Terrace | Aberdeen | AB10 1XE

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Scottish Water

Monday, 29 June 2026



Marine Licensing
375 Victoria Road

Aberdeen

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk



Dear Customer,

MeyGen Tidal Energy Project Area, Inner Sound, Pentland Firth, KW1 4YB
Planning Ref: SCOP-0075
Our Ref: DSCAS-0158034-2ZF
Proposal: Section 36 consent variation

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at <https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and->

Developers/Connecting-to-Our-Network which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

Next Steps:

All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

[Redacted]

Development Services Analyst
PlanningConsultations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Supplementary Guidance

- Scottish Water asset plans can be obtained from our appointed asset plan providers:
 - Site Investigation Services (UK) Ltd
 - Tel: 0333 123 1223
 - Email: sw@sisplan.co.uk
 - www.sisplan.co.uk
- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for

checking the water pressure in the area, then they should write to the Development Operations department at the above address.

- If a connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.
- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or a Sustainable Drainage System (SUDS) proposed to vest in Scottish Water is constructed.
- Please find information on how to submit application to Scottish Water at our Customer Portal.

SEPA

From: [Planning.North](#)
To: [MD Marine Renewables](#)
Subject: PCS-20009242 SEPA response to SCOP-0075
Date: 01 July 2026 14:09:38
Attachments: [image.png](#)

To Whom It May Concern,

Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
SCOP-0075 - MeyGen Tidal Project variation, Inner Sound, Pentland Firth

Thank you for the above consultation. Based on the information provided, this application appears to fall below the thresholds that SEPA would normally provide site specific advice for. We refer you to the [SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations](#). You should also refer to our wider standing advice and other guidance, which is available on our website via:

www.sepa.org.uk/environment/land/planning/. If there is a significant site-specific issue that is not addressed by our guidance or other information available on our website, and on which you would like our advice, please reconsult us clearly highlighting the issue in question and we will do our best to assist.

from

[Redacted]

Senior Planning Officer



For the future of our environment

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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

Licensing Operations Team
Marine Directorate
Marine Laboratory
Aberdeen
AB11 9DB

Please ask for: [Redacted]
Direct phone: [Redacted] [Redacted]
Your ref: SCOP-0075
Our ref: 26/02826/MAR
Date: 28th July 2026

Dear Sir/Madam,

**CONSULTATION UNDER REGULATION 12(4) OF THE ELECTRICITY WORKS 2017
AND REGULATION 14(4) OF THE MARINE WORKS 2017 REGULATIONS**

**SCOP-0075 – MEYGEN PLC, MEYGEN TIDAL PROJECT, INNER SOUND,
PENTLAND FIRTH**

Thank you for consulting The Highland Council (THC) on the Environmental Impact Assessment (EIA) Scoping Request for the above project. We received the consultation request on 25th June 2026 and this was registered on the 2nd July 2026. Having reviewed the supporting documents supplied as part of the consultation we have the following comments to make:

We understand that the application seeks to vary the existing Section 36 consent (2013) and the Marine Licence (214). The proposed variations relate to;

- A change in the array area in which the tidal turbines are installed, including a reduction in the area consented.
- A reduction from 61 to 34 turbines.
- An increase in rotor diameter from 16-20m to 16-26m
 - Associated increase in rotor swept area per turbine from 201-314m² to 201-531m²
 - Associated reduction in the minimum clearance of the turbine rotors to seabed from 4.5m to 2m
 - Associated reduction in minimum clearance of the turbine rotors to the sea surface at lowest Astronomical Tide from 8m to 6m.
- An increase in cable voltage for new cables from 6.6kV to 12kV; and
- Removal on the cap on individual turbine rated power.

It is understood that these amendments are confined to the offshore elements of the project and that no changes are proposed to the separately consented onshore components of the development.

Having reviewed the supporting documents supplied as part of the consultation we have the following comments to make:

Coastal Process – The Council notes that the applicant has proposed to scope out significant effects on coastal processes on the basis that the original hydrodynamic assessment represented a realistic worst-case scenario, with thrust applied in 2012 modelling resulting in an overestimation of potential changes to the wave and tidal regime. The Council also notes the validity of the original modelling has been independently reviewed by the University of Edinburgh and found to remain applicable to the proposed variation.

We have also considered the reduction in the minimum blade clearance to 2m above seabed. It is understood that the original hydrodynamic assessment utilised a depth average approach and, as such turbine clearance above the seabed was not a parameter incorporated within the model and the distance from the seabed to blade tip was not considered to influence the modelling outcomes. On this basis and having regard to the applicant's reliance on the original hydrodynamic assessment, the validity of which has been independently reviewed by the University of Edinburgh, the Council accepts that significant effects on coastal processes are unlikely to differ materially from those previously assessed. Accordingly, the Council agrees that this topic can be scoped out.

To assist the assessment of any future application it is recommended that the applicant submits the University of Edinburgh's review, or a summary of its conclusions where appropriate, in support of the application.

Seascape, Landscape and Visual Impact – We note that the proposed variation relates solely to the offshore elements of the development, and no changes are proposed to the onshore infrastructure. Furthermore, the revised proposal comprises fewer turbines than were assessed as part of the original application and does not introduce any surface infrastructure. We are therefore content that Seascape, Landscape and Visual Impact can be scoped out.

Other Comments

The Council notes that the proposed variation would reduce the minimum clearance between the blade tip and the sea surface to 6m. It is considered that this reduced clearance has the potential to influence navigational safety and vessel movement, particularly for vessels with deeper draughts or where under keel clearance is an important consideration. Whilst recognising that navigational safety is principally a matter for the relevant maritime consultees, the applicant should confirm whether this reduction gives rise to any changes in navigational arrangements, vessel transit routes or recreational use of the area.

Yours sincerely

[Redacted]

Principal Aquaculture and Coastal Planner
(Highland Wide)

**The Royal Yachting Association
Scotland**

10th July 2026

Licensing Operations Team
Marine Directorate
Marine Laboratory,
375 Victoria Road,
Aberdeen,
AB11 9DB
MD.MarineRenewables@gov.scot

Dear Sir/Madam

SCOP-0075 – MeyGen PLC – MeyGen Tidal Project – Inner Sound, Pentland Firth

I have read the appropriate parts of the scoping report on behalf of RYA Scotland and, while I do not anticipate any issues during the operation of the proposed scheme, agree that shipping and navigation should be scoped in to the EIA. I note that we are listed as bodies to be contacted about this and confirm that we will be happy to contribute as we did to the initial scheme which has been operating without any issues for recreational boating as far as I am aware. I will work with my colleague in the Cruising Association. I suggest that the Pentland Firth Yacht Club from Thurso is added to the list of consultees.

Yours sincerely,

[Redacted]

Planning and Environment Officer, RYA Scotland

Transport Scotland

From: [Redacted]
To: [MD Marine Renewables](#)
Cc: [Redacted]
Subject: MeyGen PLC - MeyGen Tidal Project – Inner Sound, Pentland Firth - Consultation on Request for EIA Scoping Opinion and HRA Screening Opinion - 21 July 2026
Date: 21 July 2026 15:03:58
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)

Licensing Operations Team

Thank you for the opportunity to comment on the Scoping Report (SR) for the offshore elements of the MeyGen Tidal Project, located within the Inner Sound of the Pentland Firth. I understand that this is produced in support of a variation to a Section 36 Consent granted in 2013 and the Developer now seeks to vary the 2013 Section 36 Consent and a Marine Licence granted in 2014, whereby the Developer is seeking to install the most efficient turbine technology, maximise the available resource and reduce the end cost of the energy produced. I note that the Proposed Variation involves changes to the offshore elements of the Consented Project only, with no changes to the Consented Project above Mean High Water Springs (MHWS). No variations to existing onshore consents are sought.

The SR states that an onshore export cable connection is required between the Power Conversion Unit Building (PCUB) and the planned Gills Bay substation, located approximately 5.4 km to the south-west. The cable is proposed to be installed underground. I note that separate consents and planning permit EIA will be sought for this onshore cable connection, and the connection does not form part of the Proposed Variation assessed within the EIA Scoping Report.

Given the above, I can confirm that Transport Scotland does not have any comment to make on the offshore SR or the Variation application. We would, however, expect to be consulted on the onshore cable connection, when submitted.

Kind regards,

[Redacted]
Development Management
Network Operations
Roads Delivery and Operations Directorate

transport.gov.scot

Transport Scotland 5th Floor 177 Bothwell Street Glasgow G2 7ER



TRANSPORT SCOTLAND
CÒMHDHAIL ALBA



UK Chamber of Shipping

From: [Redacted]
To: [MD Marine Renewables](#)
Subject: RE: MeyGen PLC - MeyGen Tidal Project – Inner Sound, Pentland Firth - Consultation on Request for EIA Scoping Opinion and HRA Screening Opinion - Response required by 25 July 2026
Date: 02 July 2026 15:43:45
Attachments: [image001.png](#)
[image003.png](#)

Dear Marine Renewables,

The UK Chamber of Shipping welcomes the consultation on the Scoping Report for MeyGen Tidal Project and offers response limited to our main area of interest, Chapter 14 – Shipping and Navigation.

1. Do you agree the proposed shipping and navigation study area is sufficient to capture all relevant impacts?

The Chamber accepts the 5nm study area for the development given its scale and location.

2. Do you agree that all relevant data sources have been identified and are sufficient to characterise the baseline?

The Chamber considers the list of data sources to be typical. The Chamber however does not agree with the statement within 14.4.15 that it is not possible to predict future vessel activity with a high degree of accuracy, rather considering that much of the traffic has been steady for a large number of years and may be expected to be steady going forward. This is particularly the case due to the sites location and limitations to large vessel traffic.

3. Do you agree with the outlined approach to the vessel traffic survey, in particular, the use of CCTV in place of radar data?

Chamber member vessels are of sufficient size so as to carry AIS. The Chamber is open to CCTV data being used so long as MCA and NLB are satisfied.

4. Have all the potential impacts on shipping and navigation scoping resulting from the development been identified? Do you agree with the scoped-in impacts?

In addition to the impact identified the Chamber recommends that SN-04 fully considers draught of impacted vessels for deviation, as well as analysis into likely squat of vessels transiting given regular climatic conditions with the proposal for UKC to be reduced to 6m. This aligns with 14.9.5.

The Chamber recommends that SN-06 consider the draught of SAR and ETV vessels that may be utilised in a SAR event, and any impact on UKC.

5. Do you agree that appropriate shipping and navigation consultees have been identified?

Yes

6. Do you agree with the proposed approach to the NRA and EIA assessment?

Yes as in agreement with MGN 654.

The Chamber hopes these comments are of value and welcomes any follow up as merited.

Yours faithfully,
[Redacted]

Policy Director, Shipping Industry & Research
UK Chamber of Shipping
30 Park Street, London, SE1 9EQ

DD: +44 (0)20 7417 2843
[Redacted]

www.ukchamberofshipping.com