

LICENCE AND CONSENT VARIATION – VALIDATION OF APPROPRIATE ASSESSMENT

1 Licence Details

<u>Company Name:</u>	Green Volt Windfarm Ltd
<u>Site Details:</u>	Green Volt Offshore Wind Farm, approximately 80 kilometres off the Aberdeenshire Coast, and associated offshore transmission infrastructure to landfall
<u>Date Existing Licence/Consent (“the Existing Consent”) Issued:</u>	19 April 2024
<u>Date of Existing Appropriate Assessment (“AA”) (“the Existing AA”):</u>	15 April 2024

2 Summary of proposed variation application:

Green Volt Offshore Windfarm Ltd (“the Company”) submitted an application on 17 November 2025 to vary the existing section 36 consent and generating station and offshore transmission infrastructure marine licences (“the Variation Application”).

The Variation Application seeks to vary the section 36 consent granted on 19 April 2024 (“the Existing Consent”) in the following manner:

- Vary Annex 1 to amend the description of the development (“the original design scenario”) as follows:
 - Increase the maximum hub height to 148 metres (“m”) above Still Water Level (“SWL”) rather than 143m above Lowest Astronomical Tide (“LAT”);
 - Increase the maximum height to blade tip to 266m above SWL rather than 264m above LAT;
 - Decrease the maximum rotor diameter to 236m from 242m;
 - Alter the blade tip clearance to 22m above SWL rather than Mean High Water Springs;
 - Decrease the maximum blade width to 6.5m from 8m;
 - Decrease the minimum turbine spacing to 1,000m from 1,540m;
 - Increase the maximum turbine spacing to 5,000m.
- Vary Annex 1 to add a second design scenario to the description of the development (“the second design scenario”) as follows:

Up to 30 three-bladed horizontal axis wind turbine generators (“WTGs”) each with:

- A maximum rotor hub height of 159m above SWL;

- A maximum height to blade tip of 289m above SWL;
 - A maximum rotor diameter of 260m;
 - A blade tip clearance of 22m above SWL;
 - A maximum blade width of 6.81m;
 - A minimum turbine spacing of 1,000m;
 - A maximum turbine spacing of 5,000m.
- Vary Annex 1 of the Existing Consent to specify the following:
 - Where the final design agreed through the Development Specification and Layout Plan (“DSLPL”) includes a combination of parameters from the original design scenario and the second design scenario, the collision risk to birds must be no greater than assessed in the Appropriate Assessment. If required by the Scottish Ministers, the Applicant must provide evidence of this using the best available science.
 - Vary Annex 1 to permit the use of semi-catenary, taut or semi-taut mooring lines in addition to catenary moorings; increase the mooring line radius to 1,000m from 650m; increase the number of anchors per WTG to nine from six; and permit the use of torpedo, gravity-based, suction pile and drag embedment anchors.
 - Vary condition 13 of Annex 2 of the Existing Consent to remove the requirement for representative wind farm visualisations from key viewpoints, and to remove the requirement for this plan to be based on the Development Specification and Layout Plan.
 - Vary condition 27 of Annex 2 of the Existing Consent to change the timescales for the submission of the Detailed Seabird Compensation Plan from six months prior to the implementation of compensatory measures to six months prior to the Commencement of the Development. Additionally to permit rotation of turbine blade for testing prior to the Scottish Ministers concluding that the success criteria of the Compensatory Measures have been met.
 - Vary Annex 3 to update the definitions and glossary of terms.

In addition to the varying the Existing Consent, the Company also requested to vary the associated generating station marine licence (“the GS ML”) to:

- Change the description of the licensed activity and construction materials described in the GS ML in line with the variation requested to the Existing Consent.
- Vary condition 3.2.7 to remove the requirement for representative wind farm visualisations from key viewpoints, and to remove the requirement for this plan to be based on the Development Specification and Layout Plan.
- Vary condition 3.2.23 to change the timescales for the submission of the Detailed Seabird Compensation Plan from six months prior to the implementation of compensatory measures to six months prior to the Commencement of the Development. Additionally to permit rotation of turbine

blade for testing prior to the Scottish Ministers concluding that the success criteria of the Compensatory Measures have been met.

The Company also requested to vary the marine licence for the Offshore Transmission to landfall infrastructure (“OfTI ML”) to:

Alter the construction materials listed to permit:

- increase the maximum weight of the offshore substation platform (“OSP”);
- increase the maximum OSP topside length and width;
- increase the number of piles per foundation, pile diameter, seabed penetration depth, scour protection area and volume per foundation;
- Vary condition 3.2.8 to remove the requirement for representative wind farm visualisations from key viewpoints, and to remove the requirement for this plan to be based on the Development Specification and Layout Plan.
- Vary condition 3.2.23 to change the timescales for the submission of the Detailed Seabird Compensation Plan from six months prior to the implementation of compensatory measures to six months prior to the Commencement of the Development. Additionally to permit rotation of turbine blade for testing prior to the Scottish Ministers concluding that the success criteria of the Compensatory Measures have been met.
- Increase the maximum hammer driving energy associated with piling the OSP foundation to 3500 kilojoules
- Decrease the maximum number of blows per minute to 40 and maximum number of blows per pile to 8406;

Appendix 1 of the Variation Application contains an updated Screening Report (“the Screening Report”) to consider the potential changes to effects caused by the changed parameters and methods.

For marine geology and physical processes the Company concluded that the impacts from the Variation Application are solely derived from the increased direct footprint of the wind farm site, whilst there is an increase in the extent of seabed disturbance, the potential impact is not materially different from that originally assessed.

The Company has drawn the same conclusion for benthic ecology for the same reasoning.

Similarly, the Company concluded that the proposed increase in footprint will not result in materially different impacts on fish and shellfish ecology from that originally assessed. In relation to underwater noise and vibration impacts, the Company undertook updated underwater noise modelling for impact piling at the OSP location due to the changes in piling parameters. The Company stated that, given the distance of Green Volt Offshore Wind Farm from potentially affected designated sites, there will be no possibility of new or materially different effects from the Variation Application.

In relation to ornithological impacts, the Company undertook updated Seabird Collision Risk Modelling (Appendix B of the Screening Report). The Company concluded that the proposed variation to the WTG design envelope would reduce the risk of collision with



seabirds. Furthermore, as there is no change to the boundary of the array area, displacement as an impact pathway is not materially changed to that which was originally assessed in the Existing AA.

Section 4.4 of the Screening Report presents a detailed consideration of the effects of the Variation Application on marine mammal ecology. The following impact pathways were reconsidered: auditory injury and disturbance from underwater noise during piling; barrier effects as a result of underwater noise; and potential entanglement with mooring lines. The assessment was undertaken using updated population estimates. As the Variation Application includes changes to the OSP jacket pile driving installation method and maximum pile dimensions, the Company has undertaken an updated underwater noise modelling assessment to remodel the injury ranges for relevant marine receptors associated with impact piling. The steps taken in modelling the offshore pile installations using an impact hammer used an updated method from that undertaken in the original assessment, this included updated methods for source level and sound propagation modelling. The Company highlighted that the predicted impact range for marine mammals increased compared to the predicted impact range used in the original assessment, the Company acknowledged that this is likely due to the increase in hammer energies but also as a result of the updated approach to the underwater noise modelling. However, the Company concluded that the characteristics of the impact pathway and its spatially constrained nature remain comparable to those previously assessed. Consequently, the Company concluded that there is no material change to the impact pathway for auditory injury and disturbance resulting from pile related underwater noise to that which was already assessed in the Existing AA. Furthermore, the Company concluded there is no significant change to barrier effects as a result of the Variation Application, and that the proposed increase in maximum length of mooring lines does not meaningfully alter the risks of entanglement with marine mammals.

In summary, the Company concluded in the Screening Report that the Variation Application does not give rise to any new or materially different impacts that could potentially cause Likely Significant Effect (“LSE”) on any European site, either alone or in-combination, and as such the conclusions of the Existing AA remain valid and no further assessment is required.

3 Summary of consultation responses – in relation to European protected sites:

NatureScot was consulted and provided a response on 04 February 2026.

NatureScot was satisfied that the Variation Application will not give rise to any additional impacts on European sites or features beyond those identified in the Existing AA.

Furthermore, NatureScot was satisfied that the conclusions of the Existing AA remain valid and that no further assessment or mitigation is required.

4 Summary of other information in relation to European protected sites (MD-SEDD responses, external reports).

Natural England advised that the Variation Application will not have any significant effect on European sites or features that were not considered in the Existing AA.

5 Updated in-combination assessment:

5.1 Ornithology

Updated in-combination assessment for Buchan Ness to Collieston Coast SPA, Calf of Eday SPA, Cape Wrath SPA, Copinsay SPA, Coquet Island SPA, East Caithness Cliffs SPA, Fair Isle SPA, Farne Islands SPA, Fetlar SPA, Flamborough and Filey Coast SPA, Forth Islands SPA, Foula SPA, Fowlsheugh SPA, Handa SPA, Hermaness, Saxa Vord and Valla Field SPA, Hoy SPA, Marwick Head SPA, North Caithness Cliffs SPA, North Rona and Sula Sgeir SPA, Noss SPA, Rousay SPA, St Abb’s Head to Fast Castle SPA, St Kilda SPA, Sule Skerry and Sule Stack SPA, Sumburgh Head SPA, Troup, Pennan and Lion’s Heads SPA and West Westray SPA.

a) New plans or projects – Offshore windfarms

Project	Description
Aspen Offshore Wind Farm and Transmission Infrastructure	This INTOG project consists of up to 72 WTGs 84km off Peterhead with a cable to landfall near Stonehaven. Cables to oil and gas assets will be applied for separately at a later date. https://marine.gov.scot/node/26045
Cenos Offshore Wind Farm and Transmission Infrastructure	This INTOG project consists of up to 95 WTGs 200km off the Aberdeenshire coast with a cable to landfall near Peterhead. Cables to oil and gas assets will be applied for separately at a later date. Construction is due to commence in 2030 and take up to five years with the project becoming fully operational by 2035 at the latest. https://marine.gov.scot/ml/cenos-offshore-windfarm
Culzean Floating Offshore Wind Turbine Pilot Project	Construction and operation of one floating offshore WTG with a maximum generating capacity of 3MW. The turbine will be connected to the existing Culzean Central Processing Facility Platform. It will take approximately one month for the pre-construction, construction and installation of the WTG, moorings, and cable installation activities which are proposed to take place in Q3, 2025. https://marine.gov.scot/?q=ml/culzean-floating-offshore-wind-turbine-pilot-project
Muir Mhòr Offshore Wind Farm	A ScotWind project consisting of up to 67 WTGs approximately 63km off the coast of Peterhead. https://marine.gov.scot/?q=node/24011



Ossian Offshore Wind Farm	A ScotWind project consisting of up to 265 WTGs approximately 80km south-east of the Aberdeenshire Coast. https://marine.gov.scot/?q=node/23264
Salamander Offshore Wind Farm	A maximum of seven floating WTGs to be installed approximately 35km off the coast of Peterhead, Aberdeenshire. https://marine.gov.scot/ml/salamander-offshore-wind-farm

b) New plans or projects – Non-Offshore windfarms

Project	Description
Balfour Beatty – Forth Rail Bridge	Bridge maintenance.
Cambois Cable	Construction and operation of up to four HVDC export cables from up to two offshore converter station platforms within Berwick Bank Wind Farm to landfall at Cambois, Northumberland. A range of trenching tools may be used, and cable protection will be used where target burial cannot be achieved. Proposed to begin in Q4 2026 with completion expected in Q4 2029.
Eastern Green Link 3 Cable Survey	Geophysical, geotechnical and benthic vessel-based surveys for cable route between Peterhead and England.
Inch Cape Offshore Windfarm – Boulder Clearance and Unexploded Ordnance (“UXO”) Identification (“ID”)	Pre-construction boulder clearance and UXO ID of the array array and export cable corridor for Inch Cape Offshore Windfarm between Q3 2025 and Q4 2027. It is anticipated that 20,000 boulders will be moved. UXO ID will be carried out using Multi-beam Echo Sounder and Ultra-Short Baseline.
Inch Cape Offshore Windfarm – UXO Clearance	Pre-construction UXO clearance of the array array and export cable corridor for Inch Cape Offshore Windfarm between Q3 2025 and Q4 2027. It is anticipated that a maximum of 85 UXO targets will require clearance, with 75 using low order clearance methods and up to 10 requiring high order clearance.
Native Oyster restoration trial project	Reintroduction of native oysters in the Firth of Forth. Restoration Forth propose to reintroduce native oysters, a Priority Marine Feature at two locations (Inchkeith and Inchmickery) over the summer and autumn of 2024 with monitoring ongoing into 2026.
NorthConnect Cable	Installation of a High Voltage Direct Current (“HVDC”) interconnector cable between Peterhead and Norway. Construction of the cable is scheduled to be complete by 2032.
Nova Shetland Tidal Array, Bluemull Sound	Operational tidal array comprised six turbines. Licence granted in 2023 to decommission three of the six turbines. Three turbines have now been successfully decommissioned.

Orbital Eday 3 - Fall of Warness Tidal Test Site, European Marine Energy Centre ("EMEC")	The Orbital Eday 3 proposal is to construct, alter or improve one Orbital O2-X tidal energy device at the EMEC Fall of Warness Tidal Test Site.
SHEPD - North Coast and Orkney Islands Geophysical Surveys – Basking Shark and European Protected Species ("EPS") Licences	Geophysical surveys of 24 cable routes contained within 17 cable corridors in the North Coast and Orkney region with a maximum total survey area of 240km ² . Survey activity is expected to be complete by 30 September 2028.
Spittal to Peterhead HVDC Cable	The project will consist of a HVDC link including approximately 172km of subsea cable. The cable will be buried along the route where possible, and where this cannot be done alternative cable protection will be utilised, such as rock armour. The proposed start date is November 2025, with a proposed completion date of December 2030.

c) Expired plans or projects

- Shetland to Caithness Cable Installation

d) Updated assessment for Buchan Ness to Collieston Coast SPA, Calf of Eday SPA, Cape Wrath SPA, Copinsay SPA, Coquet Island SPA, East Caithness Cliffs SPA, Fair Isle SPA, Farne Islands SPA, Fetlar SPA, Flamborough and Filey Coast SPA, Forth Islands SPA, Foula SPA, Fowlsheugh SPA, Handa SPA, Hermaness, Saxa Vord and Valla Field SPA, Hoy SPA, Marwick Head SPA, North Caithness Cliffs SPA, North Rona and Sula Sgeir SPA, Noss SPA, Rousay SPA, St Abb's Head to Fast Castle SPA, St Kilda SPA, Sule Skerry and Sule Stack SPA, Sumburgh Head SPA, Troup, Pennan and Lion's Heads SPA and West Westray SPA.

A review has been carried out of all the projects which currently have an active or open application for a marine licence, section 36 consent or EPS licence which potential for LSE has been identified on the qualifying interests of the same SPAs as are affected by the Variation Application.

A number of licences to carry out dredging and sea deposit of dredged material have been issued and will have LSE on the qualifying interests of the same SPAs as the Variation Application, however any impact from these projects will be minor and short term and therefore not have a significant contribution to in-combination effects with the Variation Application.

There are also a number of active marine licences to deposit fish farms which will have LSE on the same SPAs as the Variation Application, however effects from these projects are minor and not likely to lead to significant in-combination effects with the Variation Application.

Licences have also been issued for Eastern Green Link 3 cable surveys, maintenance of Forth Rail Bridge, native oyster reintroduction in the Firth of Forth, Inch Cape Offshore

Windfarm boulder clearance and UXO ID, and Inch Cape Offshore Windfarm UXO clearance, and North Coast and Orkney Islands geophysical surveys. These plans and projects will have LSE on the qualifying interests for some of the same SPAs as the Variation Application, however these works are all small scale and any residual impacts will be very localised so will not contribute significantly to in-combination effects with the Variation Application.

The St Margaret's Hope Pier Extension project was identified as having LSE on the Hoy SPA, however the marine works took place from February to May 2024 and therefore no in-combination effects are anticipated with the Variation Application.

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Buchan Ness to Collieston Coast SPA, Calf of Eday SPA, Cape Wrath SPA, Copinsay SPA, Coquet Island SPA, East Caithness Cliffs SPA, Fair Isle SPA, Farne Islands SPA, Fetlar SPA, Flamborough and Filey Coast SPA, Forth Islands SPA, Foula SPA, Fowlsheugh SPA, Handa SPA, Hermaness, Saxa Vord and Valla Field SPA, Hoy SPA, Marwick Head SPA, North Caithness Cliffs SPA, North Rona and Sula Sgeir SPA, Noss SPA, Rousay SPA, St Abb's Head to Fast Castle SPA, St Kilda SPA, Sule Skerry and Sule Stack SPA, Sumburgh Head SPA, Troup, Pennan and Lion's Heads SPA and West Westray SPA:

- Aspen Offshore Wind Farm

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Forth Islands SPA and St Abb's Head to Fast Castle SPA:

- Cambois Cable

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Buchan Ness to Collieston Coast SPA, Calf of Eday SPA, Cape Wrath SPA, Copinsay SPA, East Caithness Cliffs SPA, Fair Isle SPA, Farne Islands SPA, Fetlar SPA, Flamborough and Filey Coast SPA, Forth Islands SPA, Foula SPA, Fowlsheugh SPA, Handa SPA, Hermaness, Saxa Vord and Valla Field SPA, Hoy SPA, Marwick Head SPA, North Caithness Cliffs SPA, North Rona and Sula Sgeir SPA, Noss SPA, Rousay SPA, St Abb's Head to Fast Castle SPA, St Kilda SPA, Sule Skerry and Sule Stack SPA, Sumburgh Head SPA, Troup, Pennan and Lion's Heads SPA and West Westray SPA:

- Cenos Offshore Wind Farm and Transmission Infrastructure

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Buchan Ness to Collieston Coast SPA, Flamborough and Filey Coast SPA, Forth Islands SPA, Fowlsheugh SPA, St Abb's Head to Fast Castle SPA, and Troup, Pennan and Lion's Heads SPA:

- Culzean Floating Offshore Wind Turbine Pilot Project

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Buchan Ness to Collieston Coast SPA, Calf of Eday SPA, Cape Wrath SPA, Copinsay SPA, Coquet Island SPA, East Caithness Cliffs

SPA, Fair Isle SPA, Farne Islands SPA, Fetlar SPA, Flamborough and Filey Coast SPA, Forth Islands SPA, Foula SPA, Fowlsheugh SPA, Handa SPA, Hermaness, Saxa Vord and Valla Field SPA, Hoy SPA, Marwick Head SPA, North Caithness Cliffs SPA, North Rona and Sula Sgeir SPA, Noss SPA, Rousay SPA, St Abb's Head to Fast Castle SPA, St Kilda SPA, Sule Skerry and Sule Stack SPA, Sumburgh Head SPA, Troup, Pennan and Lion's Heads SPA and West Westray SPA:

- Muir Mhòr Offshore Wind Farm

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Buchan Ness to Collieston Coast SPA:

- NorthConnect Cable

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Hermaness, Saxa Vord and Valla Field SPA:

- Nova Shetland Tidal Array, Bluemull Sound

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Buchan Ness to Collieston Coast SPA, Calf of Eday SPA, Copinsay SPA, Coquet Island SPA, East Caithness Cliffs SPA, Fair Isle SPA, Farne Islands SPA, Flamborough and Filey Coast SPA, Forth Islands SPA, Fowlsheugh SPA, Hermaness, Saxa Vord and Valla Field SPA, Hoy SPA, Marwick Head SPA, North Caithness Cliffs SPA, North Rona and Sula Sgeir SPA, Noss SPA, Rousay SPA, St Abb's Head to Fast Castle SPA, St Kilda SPA, Sule Skerry and Sule Stack SPA and Troup, Pennan and Lion's Heads SPA:

- Ossian Offshore Wind Farm

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Buchan Ness to Collieston Coast SPA, Calf of Eday SPA, Cape Wrath SPA, Copinsay SPA, East Caithness Cliffs SPA, Fair Isle SPA, Fetlar SPA, Forth Islands SPA, Foula SPA, Fowlsheugh SPA, Handa SPA, Hermaness, Saxa Vord and Valla Field SPA, Hoy SPA, Marwick Head SPA, North Caithness Cliffs SPA, North Rona and Sula Sgeir SPA, Noss SPA, Rousay SPA, St Abb's Head to Fast Castle SPA, St Kilda SPA, Sule Skerry and Sule Stack SPA, Sumburgh Head SPA, Troup, Pennan and Lion's Heads SPA and West Westray SPA:

- Salamander Offshore Wind Farm

The following project was not assessed in the Existing AA and was identified as having an LSE on the qualifying interests of the Buchan Ness to Collieston Coast SPA, Copinsay SPA, East Caithness Cliffs SPA, Hoy SPA, North Caithness Cliffs SPA, and Troup, Pennan and Lion's Heads SPA:

- Spittal to Peterhead HVDC Cable

There will be in-combination effects with the variation application from the Cambois Cable; Aspen, Cenos, Culzean, Muir Mhòr, Ossian and Salamander offshore wind farms; the NorthConnect and Spittal to Peterhead Cables; and the Nova Shetland Tidal Array. The Scottish Ministers conclude that, providing any conditions of the AAs for the

above projects are adhered to, the conditions of the Existing AA and the condition set out in Section 7 below is adhered to, any in-combination effects will not cause an AEOSI.

5.2 Marine Mammals

Updated in-combination assessment for Moray Firth SAC

a) New plans or projects – Offshore Windfarms

Project	Description
Aspen Offshore Wind Farm	This INTOG project consists of up to 72 WTGs 84km off Peterhead with a cable to landfall near Stonehaven. Cables to oil and gas assets will be applied for separately at a later date. https://marine.gov.scot/node/26045
Cenos Offshore Wind Farm and Transmission Infrastructure	This INTOG project consists of up to 95 WTGs 200km off the Aberdeenshire coast with a cable to landfall near Peterhead. Cables to oil and gas assets will be applied for separately at a later date. Construction is due to commence in 2030 and take up to five years with the project becoming fully operational by 2035 at the latest. https://marine.gov.scot/ml/cenos-offshore-windfarm
Muir Mhòr Offshore Wind Farm	A ScotWind project consisting of up to 67 WTGs approximately 63km off the coast of Peterhead. https://marine.gov.scot/?q=node/24011
Ossian Offshore Wind Farm	A ScotWind project consisting of up to 265 WTGs approximately 80km south-east of the Aberdeenshire Coast. https://marine.gov.scot/?q=node/23264
Salamander Offshore Wind Farm	A maximum of seven floating WTGs to be installed approximately 35km off the coast of Peterhead, Aberdeenshire. https://marine.gov.scot/ml/salamander-offshore-wind-farm

b) New plans or projects – Non-Offshore Windfarms

Project	Description
BEAR Scotland Ltd - Bridge Maintenance -	10 year bridge maintenance works to carriageway and walkways.

A9 Cromarty Bridge, Culbokie	
Bowdun Offshore Wind Farm Landfall Site Geophysical Surveys	Geophysical surveys within one km ² portion of the project's nearshore area to inform export cable landfall plans.
BP North East Offshore Wind Limited Array Area and Export Cable Corridor Geophysical Surveys EPS Licence Application	Geophysical survey of Flora Offshore Wind Farm array area and export cable corridor. Surveys due to be complete by 31 May 2028.
Eastern Inner Dock Quay, Port of Nigg - Quayside Construction	Creation of an Inner berth to existing dock to provide a quay suitable for ship berthing. New quay - 290m long and 36m wide. The works will take approximately two years to complete, the anticipated start dates for work is Jan 2025.
EPS Licence - Inch Cape Offshore Windfarm (revised design) construction	Construction activities associated with Inch Cape Offshore Windfarm generating station.
Inch Cape Offshore Windfarm - UXO Clearance	Pre-construction UXO clearance of the array array and export cable corridor for Inch Cape Offshore Windfarm between Q3 2025 and Q4 2027. It is anticipated that a maximum of 85 UXO targets will require clearance, with 75 using low order clearance methods and up to 10 requiring high order clearance.
Invergordon Service Base Phase 5	Construction to extend quay with piled wall, rock armour and infill to increase laydown area with additional construction of heavy load pad, RoRo area and widening of access. Sept 2025 - Sept 2030.
NnGOWL Windfarm and Export Cable Corridor construction EPS licence	Variation to extend the existing EPS licence which relates to construction activities at the Neart na Gaoithe Wind Farm and export cable corridor. These activities include: export and inter-array cable installation; rock placement for cable protection; use of ultra short baseline positioning devices and vessel activity during construction. Additionally, geophysical surveys will be undertaken utilising the following equipment: multi-beam echosounder; side-scan sonar; sub-bottom profiler; and very high frequency obstacle sonar.
Oyster translocation Dornoch Firth	Creation of cultch bed, and subsequent deposit of native oysters.
Port of Dundee Quay Improvement	Construction of new piled wall 106m long using impact and vibro-piling for 48 piles.
Seagreen Offshore Transmission Asset Final Construction and Operations and Maintenance Activities	Construction of the landfall duct burial for the offshore transmission assets ("OTA") and associated operation and maintenance activities including geophysical surveys and repairs of the OTA (including the export cable and offshore substation platform). Total duration anticipated to be up to

	five months in 2024, two months in 2025 and two months in 2026.
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- c) Expired plans or projects
 - Ardersier Port Development
- d) Updated assessment for Moray Firth SAC

A review has been carried out of all the projects which currently have an active or open application for a marine licence, section 36 consent or EPS licence which potential for LSE has been identified on the qualifying interests of the Moray Firth SAC.

A number of licences to carry out dredging and sea deposit of dredged material have been issued and will have LSE on the qualifying interests of the Moray Firth SAC, however any impact from these projects will be minor and short term and therefore not have a significant contribution to in-combination effects with the Variation Application.

Licences have also been issued for maintenance of Cromarty Bridge, native oyster translocation in the Dornoch Firth, Inch Cape Offshore Windfarm UXO clearance, Inch Cape Offshore Windfarm generating station construction, Neart na Gaoithe and Seagreen Offshore wind farms construction, and geophysical surveys associated with Bowdun and Flora offshore wind farms. These plans and projects will have LSE on the qualifying interests of the Moray Firth SAC, however these works are all small scale and any residual impacts will be very localised so will not contribute significantly to in-combination effects with the Variation Application.

The following projects were not assessed in the Existing AA and were identified as having LSE on the qualifying interests of the Moray Firth SAC:

- Aspen Offshore Wind Farm
- Cenos Offshore Wind Farm and Transmission Infrastructure
- Eastern Inner Dock Quay, Port of Nigg - Quayside Construction
- Invergordon Service Base Phase 5
- Muir Mhòr Offshore Wind Farm
- Ossian Offshore Wind Farm
- Port of Dundee Quay Improvement
- Salamander Offshore Wind Farm

There will be in-combination effects with the Variation Application from the above plans and projects. However, the Scottish Ministers conclude that, providing any conditions of the AAs for the above plans and projects are adhered to and the conditions of the Existing AA are adhered to, any in-combination effects will not have an AEOSI of the Moray Firth SAC.

6 Conclusion - Consideration of whether AA completed for the original decision is still valid:

The Scottish Ministers conclude that the Existing AA remains valid in its conclusion of no AEOSI on the Moray Firth SAC, Calf of Eday SPA, Cape Wrath SPA, Copinsay SPA, Coquet Island SPA, Fair Isle SPA, Farne Islands SPA, Fetlar SPA, Flamborough and Filey Coast SPA, Foula SPA, Handa SPA, Hermaness, Saxa Vord and Valla Field SPA, Hoy SPA, Marwick Head SPA, North Caithness Cliffs SPA, North Rona and Sula Sgeir SPA, Noss SPA, Rousay SPA, St Abb's Head to Fast Castle SPA, St Kilda SPA, Sule Skerry and Sule Stack SPA, Sumburgh Head SPA and West Westray SPA, either alone or in combination with other plans and projects provided the conditions listed in the Existing AA remains adhered to and the condition in Section 7 below is adhered to.

The Scottish Ministers conclude that the Existing AA remains valid in its conclusion of AEOSI in-combination with other wind farms for:

- Kittiwake at Buchan Ness to Collieston Coast SPA;
- Kittiwake, razorbill and guillemot at East Caithness Cliffs SPA;
- Gannet at Forth Islands SPA;
- Kittiwake at Fowlsheugh SPA; and
- Kittiwake at Troup, Pennan and Lion's Heads SPA.

The Scottish Ministers further conclude that the Existing AA remains valid in being unable to conclude no AEOSI in-combination with other wind farms for:

- Guillemot at Fowlsheugh SPA; and
- Puffin at Forth Islands SPA.

7 Requirement for conditions

The requirement for the below condition is as a result of the Company's request that, where a combination of parameters from both the original design scenario and the second design scenario are used and presented in the DSLP, the collision risk to birds must be no greater than assessed in the Existing AA.

The Existing Consent already includes the requirement for a DSLP. However, condition 12 as set out below is intended to replace condition 12 as written in the Existing Consent. The condition below relates to Habitats Regulations Appraisal ("HRA") concerns as well as covering other interests. The condition here is written in its complete form and so may also refer to non-HRA interests. Defined terms used in the conditions below will have the meaning given to them in the section 36 consent variation, if granted.

In order to ensure that the final design agreed does not cause a greater risk to the environment than assessed in the original application and the Existing AA, the Scottish Ministers have added point h) to the DSLP condition.

12. Development Specification and Layout Plan

The Company must, no later than six months prior to the Commencement of the Development, submit a Development Specification and Layout Plan ("DSLP"), in writing, to the Scottish Ministers for their written approval. Such approval may only be granted following consultation by the Scottish Ministers with the MCA, NLB, NatureScot, the Ministry of Defence ("MOD"), Civil Aviation Authority ("CAA"), Scottish Fishermen's Federation ("SFF"), Aberdeenshire

Council, Aberdeen City Council, Angus Council and any such other advisors or organisations as may be required at the discretion of the Scottish Ministers.

The DSLP must include, but not be limited to the following:

- a) A plan showing the location of each individual WTG (subject to any required micro-siting), including information on WTG spacing, WTG identification/numbering, seabed conditions, bathymetry, confirmed foundation type for each WTG and any key constraints recorded on the site;
- b) A list of latitude and longitude coordinates accurate to three decimal places of minutes of arc for each WTG. This should also be provided as a Geographic Information System shape file using World Geodetic System 84 format;
- c) The grid coordinates of the centre point of the proposed location for each WTG;
- d) A table or diagram of each WTG dimensions including: height to blade tip (measured above LAT) to the highest point, height to hub (measured above LAT to the centreline of the generator shaft), rotor diameter and maximum rotation speed;
- e) The generating output of each WTG used on the site (Figure 1) and a confirmed generating output for the site overall;
- f) The finishes for each WTG (see condition 19 on WTG lighting and marking); and
- g) The length and proposed arrangements on or above the seabed of all inter-array cables.
- h) Where the final design includes a combination of parameters from scenarios 1 and 2 in Annex 1, the Company must provide evidence that the risk to the environment is no greater than that assessed in the Appropriate Assessment for the Development dated 15 April 2024 and in the Application.

Reason: To confirm the final Development specification and layout.

Name	Assessor or Approver	Date
Benjamin Taylor	Assessor	05 February 2026
Lauren Cowan	Assessor	12 February 2026
Jane Kidd	Approver	02 March 2026

