Date: 09 February 2026
Our ref: 540239
Your ref: N/A

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Licensing Operations Team,
Marine Directorate
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Aberdeen
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BY EMAIL ONLY

Dear Marc MacFarlane,

HRA Screening Report - Consultation - Morven Offshore Wind Limited - Morven Hawthorn Pit Grid Connection

Thank you for your consultation dated 03 February 2026. The consultation requested that our previous advice issued on the 26 January 2026 (Our ref 537881) was revised to indicate which items of advice specifically apply to the Scottish portion of the cable's effects on European sites of nature conservation importance in English territory.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). As the project is located partly in Scottish waters the advice from NatureScot, the statutory nature conservation body in Scotland, should be sought.

The applicant has already shared the draft Habitats Regulation Assessment (HRA) Screening Report with Natural England, and we provided them with discretionary advice on the 9 January 2026.

Natural England has provided in this letter the detailed advice on the HRA Screening Report within Appendix 1 which specifically applies to the Scottish portion of the cable's effects on European sites of nature conservation importance in English territory.

The following summary of this advice sets out where Natural England advise revisions to the HRA Screening Report are required.

<u>Marine Mammals Effective Deterrent Ranges</u>

The JNCC updated their guidance on Effective Deterrent Ranges (EDR) in 2025. The guidance reduced the EDR for high-order UXO clearance. The HRA Screening Report, Table 4.3, should be updated in line with this guidance.

The HRA Screening report scoped in the effects of increase underwater sound on the features of the Berwickshire and North Northumberland Coast Special Area of Conservation (SAC). Our original advice to the applicant sent on the 9 January 2026 was that the reduction in the

EDR may change this screening conclusion. However, on reflection, we are revising our advice due to the likelihood of grey seals from Berwickshire and North Northumberland Coast Special SAC foraging outside of the SAC boundary. There is therefore an effect pathway to grey seals from the SAC from increases in underwater sound for both the English and Scottish portion of the cable. We therefore agree with the HRA Screening Report that this effect should remain screened in for detailed consideration within the Appropriate Assessment.

Within the Appropriate Assessment we advise the applicant to use the seal tracking data from Thompson, Russell and Morris (2017). This data has been provided to the Morven project team by Natural England.

Invasive and Non-Native Species (INNS)

The Zone of Influence (ZoI) for the impact pathway *Introduction and spread of INNS* described in Table 4.8 should be reviewed. Table 4.8 currently states there is potential for INNS to spread beyond the footprint of the project; however, a 0.0km ZoI has been applied, indicating that all impacts will be confined to the footprint of the MHPGC Project.

Additional Impact Pathway

It is Natural England's advice that impacts on marine mammals due to changes in prey availability on the grey seal feature of the Berwickshire and North Northumberland Coast SAC should be additionally screened in for further assessment.

In-combination Screening (Section 5)

The HRA Screening Report does not present whether there are additional likely significant effects to be considered which have been identified in-combination with other plans or projects. A in-combination screening is required and should be presented in the HRA Screening Report to evidence that all effects which require further assessment have been identified.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely,

[redacted]

Appendix 1 Natural England's Advice

Specific comments are provided in Table 1.1 with advised actions provided in bold.

Table 1.1 Specific comments on the HRA Screening Report

Section	Subject	Comment	Advice
2.1.2	Screening of National Sites	The method of screening in sites has been presented and follows a stepwise approach using three screening criteria.	Natural England agrees with the approach applied.
2.1.1.6	Project description	Section 2.1.1.6 notes that "At the time of writing the HRA Screening Report the project description has not been defined in full and is based on that provided in the MHPGC Project Scoping Report (RPS, 2025). The MHPGC Project design will be refined as part of the PEIR submission at which point the conclusions of the HRA Screening Report will be reviewed."	Natural England acknowledges this and is aware that elements of the project are subject to refinement and will be presented in the Preliminary Environmental Information Report. The advice provided in this letter is therefore based on the project description provided in the MHPGC Project Scoping Report using in the HRA Screening Report.
3.1.1.5	Annex I Benthic habitats	No sites for this receptor group have been screened in for further consideration.	Natural England agrees with this conclusion.
3.2.3.5	Annex II terrestrial flora	No sites for this receptor group have been screened in and therefore this receptor has not been taken through to the Test of Likely Significant Effect (LSE).	Natural England agrees with this conclusion.
3.2.4	Annex II terrestrial fauna	No sites for this receptor group have been screened in based on the application of the screening criteria and are therefore not considered further.	Natural England agrees with this conclusion.
Table 4.1	Fish and Shellfish	Impacts pathways are considered and their ZoI.	Natural England agrees with the screening approach set out.
Table 4.2	River Tweed SAC and Tweed Estuary SAC	Both sites have been screened out for further assessment in Stage 2. Underwater sound impacts have been screened out due to the features (Atlantic salmon and lamprey) being considered of low risk of behavioural responses or auditory injury. Indirect impacts have been screened out due to the distances of the sites from the project boundary and that any migrating individuals are expected be able to avoid any areas impacted.	Natural England agrees with the screening approach set out.

Section	Subject	Comment	Advice
Table 4.3	Marine Mammals	Table 4.3 identifies impact pathways to marine mammal receptors and their ZoI. Table 4.4 notes that the impact pathway *Underwater sound impacts* is screened in for the Berwickshire and North Northumberland Coast SAC, located 25.6km from the MHPGC Project Interim Boundary. The ZoI for the impact pathway *Injury and disturbance from underwater sound* is stated as being 26 km and therefore the SAC is screened in as it overlaps with the ZoI for underwater noise effects on marine mammals. The Effective Deterrent Range (EDR) used to set the ZoI are based on the JNCC 2020 guidance (JNCC Report 654). In 2025, JNCC updated the EDRs as reported in the JNCC Report 803 Available: JNCC Report 803. Updated Effective Deterrent Ranges (EDRs) for assessing the significance of noise disturbance in harbour porpoise Special Areas of Conservation (SACs) (England, Wales & Northern Ireland)). JNCC Report 803 reduced the EDR for high-order UXO clearance (≤ 263 kg) to 20 km (without a bubble curtain) and to 10 km (with a bubble curtain).	**We advise that the 2025 EDR guidance is applied in the HRA Screening Report and Appropriate Assessment.** Natural England agrees that EDRs can be used as part of the screening approach. Seal tracking data should also be used in the case where mobile species are known to forage outside of the SAC. We agree with the HRA Screening Report that underwater sound impacts should be screened into Berwickshire and North Northumberland SAC should be screened in. We advise that the seal tracking data from Thompson, Russell and Morris, 2017 is used in the Appropriate Assessment (this data has been provided to the Morven project team).

Section	Subject	Comment	Advice
Table 4.4	Berwickshire and North Northumberland Coast SAC	The impact pathway *Impacts to marine mammals due to changes in prey availability* is proposed to be screened out as impacts to the seabed from construction phase activities are expected to be localised, small in extent, and in many cases temporary. This is considered unlikely to result in noticeable changes in prey density or distribution.	The document notes that there are areas within the MHPGC Project Interim Boundary identified as spawning grounds for important prey species for grey seal. Natural England notes that Table 4.5 states that mortality, injury and/or disturbance to prey may cause reduced availability to marine ornithological receptors. This is comparable to the effect this impact may also have on the grey seal population of the Berwickshire and North Northumberland Coast SAC. **Natural England advises that the impact from changes in prey availability for the grey seal feature of the Berwickshire and North Northumberland Coast SAC is screened in.**
Table 4.4	Southern North Sea SAC	Screened out of further assessment.	Natural England concurs that this site can be screened out.
Table 4.5	Marine Ornithology	Impacts pathways considered and their ZoI.	Natural England agrees with the screening approach and ZoI set out.
Table 4.8	Introduction and spread of Invasive and Non-Native Species (INNS)	The text describing the ZoI notes that INNS have the potential to spread beyond the footprint of the project however, a 0.0km ZoI has been applied indicating that all impacts will be confined to the footprint of the MHPGC Project.	Natural England agrees that the spread of INNS could potential be beyond the development footprint. **We advise the ZoI for this impact pathway is reviewed.**
Table 4.10	Terrestrial ornithology	Impacts pathways considered and ZoI	Natural England agrees with the screening approach set out.

Section	Subject	Comment	Advice
5	In-combination Effects Screening	No screening has been presented for the impact pathways which have been shown to have no likely significant effect 'alone'. Paragraph 5.1.1.1 states correctly that "The intention of this screening is to determine whether an impact pathway that has otherwise not been identified as having LSE on a designated site may have a LSE when combined with effects from other plans or projects." Paragraph 5.1.1.2 states that "For the purposes of this HRA Screening, a high-level review of other plans and projects has been undertaken to provide an initial indication of which projects might interact with the MHPGC Project. Where best available evidence indicates that there is no risk that the MHPGC Project will have LSE on specific features of a site in-combination with other plans or projects by undermining its conservation objective(s), these features will be screened out of further assessment"	Effects which cannot be excluded on the basis of objective information (i.e., effects which are 'likely') but which on their own will not undermine the conservation objectives (i.e., be 'significant') need to be considered in combination with any similar effects from other relevant plans and projects also being proposed at the same time and affecting the same site to determine if together their combined effects might be significant. The HRA Screening document does not present whether there are additional likely significant effects to be considered in the Appropriate Assessment which have been identified in-combination. It is acknowledged that the document will be revised when further details are known and a long list of projects to consider is developed. **Natural England advises that an in-combination screening assessment is required and should be presented in the HRA Screening Report to evidence that all effects which require further assessment have been identified.**
5.2	In-combination methodology	This section provides methods for the in-combination assessment proposed for the Report to Inform an Appropriate Assessment (RIAA) and is based on the guidance Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments.	Natural England agrees with the in-combination assessment methodology set out.
Table 5.2	In-combination assessment	Table 5.2 presents the in-combination effects to be considered in the RIAA.	This table will require review following the adoption of any advice provided is this letter or by others.
Table 6.1	Summary	Table 6.1 presents the Summary of National Sites screened in for Appropriate Assessment and the impact pathways to be assessed.	This table will require review following the adoption of any advice provided in this letter or by others.

Benjamin Taylor

From: [redacted]
Sent: 29 January 2026 13:34
To: Benjamin Taylor
Cc: Marc MacFarlane; Lauren Cowan; Emma Lees; [redacted]
Subject: RE: 251218 - Morven Offshore Wind Limited - Hawthorn Pit Grid Connection - HRA Screening Report - Consultation - NatureScot advice

Follow Up Flag: Follow up
Flag Status: Completed

Categories:
Objective:

Dear Benjamin,

Thank you for requesting our advice on the Habitats Regulations Appraisal (HRA) Screening Report for the Morven Offshore Wind Farm (document reference: MVCNS-J4029-RAM-00002). This HRA screening report is specific to the Morven Hawthorn Pit Grid Connection (MHPGC) Project which seeks to establish a grid connection between the Morven North or Morven South array areas in Scottish Waters and the National Grid Hawthorn Pit Substation in northeast England. Our advice is specific to Scottish sites only.

NatureScot advice

Annex I Benthic Habitats
As noted in section 3.1.1.5 there are no Annex 1 benthic habitats within the maximum zone of influence, as such we agree with the conclusion reached that no sites in Scottish waters are required to be screened into the HRA.

Annex II Fish and Shellfish
Four SACs in Scottish waters were identified within the regional Fish and Shellfish Study Area as per Table 3.1 in section 3.1.2.6. For these sites, we agree with the impact pathways considered (Table 4.1) and No Likely Significant Effect conclusions reached as per Table 4.2.

Annex II Marine Mammals
Four SACs in Scottish waters were identified as per Table 3.3 in section 3.1.3.9 with narrative on impact pathways set out in Table 4.3 which includes underwater noise impacts from UXO clearance activities. In the absence of project specific underwater noise modelling at this stage, the following sites have been screened in on a precautionary basis as per Table 4.4:

- Berwickshire and North Northumberland Coast SAC for grey seal,
- Isle of May SAC for grey seal,
- Moray Firth SAC for bottlenose dolphin.

The Firth of Tay and Eden Estuary SAC, designated for harbour seal, has been screened out on the basis that is lies 95.9km from the closest edge of the wind farm boundary and that specific to this species site fidelity life history characteristics, is likely to be found within 50km of the SAC. On this basis we agree there is No LSE for harbour seal at Firth of Tay and Eden Estuary SAC.

In Scotland, we would usually apply a 20km screening buffer for grey seal SACs. We acknowledge that they are capable of foraging larger distances, however 20km reflects their behaviour during the breeding season when they are closely associated with the SAC breeding colony and in line with Scottish Conservation Objectives. However, we note the cross-border nature of the Berwickshire and North Northumberland Coast SAC

designated for grey seal and are content to accept, in the absence of underwater noise modelling, that there is potential for a LSE.

The Isle of May SAC, also designated for grey seals, lies some considerable distance from the wind farm boundary - 94.1km. We advise that this site does not need to be screened in for further assessment, however, should the Applicant wish to do so, it is in their gift.

Bottlenose dolphins from the Moray Firth SAC are regularly sighted some 200km south in the Firth of Forth area (Hague et al. 2020) and south into English waters. This species (coastal ecotype) is mainly found within the 20m depth contour and as such relatively close to the coast. In the absence of underwater noise modelling, we are content to accept the conclusion of LSE.

Annex 1 marine ornithology
For Ornithology, we are content with the screening criteria and foraging ranges used in section 3.1.4. Upon reviewing Table 3.6 we accept the SPAs identified but note the following omissions:

- Razorbill at Fowlsheugh, Forth Islands and St Abb's Head to Fast Castle SPAs,
- Gannet at Outer Firth of Forth and St Andrews Bay Complex, Fair Isle, Hermaness, Saxa Vord & Valla Field and Noss SPAs,
- Leach's petrel at Foula SPA.

We are content with the impact pathways identified as per Table 4.5. In reviewing Tables 4.6 and 4.7 we note the following omissions:

- Great Skua at Handa, Ronas Hill - North Roe & Tingon, and St Kilda SPAs,
- Fulmar at Cape Wrath, Handa, North Rona and Sule Sgeir, Flannan Isles and St Kilda SPAs.

A conclusion of No LSE has been reached for all SPAs / features listed in Tables 4.6 and 4.7 which we agree with. Our own assessment of the omitted SPAs / features, as discussed above, also concludes No LSE.

In-combination effects screening
From Section 5, we note that the potential for in-combination effects will be considered once the long-list of relevant plans and projects is available.

I trust this is of assistance.
Best wishes,
Karen

[redacted]

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nature.scot - Scotland's Nature Agency - Buidheann Nàdair na h-Alba - @nature_scot

** If your email is particularly large please resend to marineenergy@nature.scot **