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Date: 5 March 2026

Dear Wendy Dodds,

Habitat Regulations Appraisal Screening under The Conservation of Offshore Marine Habitats and Species Regulations 2017

Thank you for the Habitat Regulations Appraisal (“HRA”) Screening Report received on 2 December 2025, in relation to the construction and operation of the proposed Morven Offshore Wind Farm - Hawthorn Pit Grid Connection Project (“the Proposed Development”). The Proposed Development will be located approximately 61 kilometres (“km”) off the coast of Aberdeenshire, with a proposed landfall location at the National Grid Hawthorn Pit Substation in Durham.

Marine Directorate - Licensing Operations Team (“MD-LOT”) has consulted on the HRA Screening Report with NatureScot, Natural England, Royal Society for the Protection of Birds Scotland, Whale and Dolphin Conservation, Fisheries Management Scotland, Dee District Salmon Fisheries Board (“DSFB”), Esk DSFB, Forth DSFB, River Tweed DSFB and Tay DSFB. Copies of the representations are attached (see Appendix 1). MD-LOT advises you to fully review and address these, however, also highlights some key points below. In addition, MD-LOT advises that the Report to Inform Appropriate Assessment (“RIAA”) must fully align with the impact pathways identified for assessment in the Scoping Opinion adopted by the Scottish Ministers in relation to the Proposed Development dated 20 March 2025 (“the Scoping Opinion”).

The Proposed Development will occur in both Scottish and English waters. However, for the purposes of this HRA Screening Opinion, MD-LOT will only be considering effects on qualifying interests of sites designated under the aforementioned regulations relating to the extent of the Proposed Development occurring within Scottish waters. This will be entirely within the Scottish offshore region i.e. beyond 12 nautical miles of mean high water springs.

Offshore - Annex I Benthic Habitats

With regards to the identification of European sites and features, MD-LOT is content with the screening criteria and the 13.5km Zone of Influence (“ZoI”) used in Section 3.1.1 of the HRA Screening Report. This is supported by the 9 February 2026 Natural England representation.

MD-LOT is also content with the conclusion in Section 3.1.1.5 of the HRA Screening Report that no sites in Scottish waters designated for benthic habitats need to be screened into the RIAA. This is in line with both the 9 February 2026 Natural England and NatureScot representations.

Offshore - Annex II Fish and Shellfish

MD-LOT highlights the Dee DSFB representation that, where evidence of a negative impact on a protected species is inconclusive or impacts of the Proposed Development are uncertain, the Developer should make reasonable efforts to fill evidence gaps, and advises this is considered by the Developer.

With regards to the identification of European sites and features, MD-LOT is content with the sites, features, screening criteria and 13.5km Zol identified in Section 3.1.2.5. This is supported by the 9 February 2026 Natural England representation.

MD-LOT is also content with the screening conclusions regarding designated sites which met these criteria in Table 4.2 of the HRA Screening Report. This is also supported by the 9 February 2026 Natural England and NatureScot representations.

Offshore - Annex II Marine Mammals

With regards to the identification of European sites and features, MD-LOT is content with the sites, features, screening criteria and 20km Zol identified in Section 3.1.3 and Table 3.3 of the HRA Screening Report.

With regards to Table 4.4 of the HRA Screening Report, MD-LOT highlights the NatureScot representation, which advises that the Proposed Development will have no likely significant effect on either the harbour seal qualifying interest of the Firth of Tay and Eden Estuary Special Area of Conservation ("SAC"), or the grey seal qualifying interest of the Isle of May SAC. Consequently, these sites can be screened out of the RIAA.

MD-LOT further agrees with the NatureScot representation that, in the absence of underwater noise modelling, impacts on both the bottlenose dolphin qualifying interest of the Moray Firth SAC and the grey seal qualifying interest of the Berwickshire and North Northumberland Coast SAC should be screened into the RIAA. This latter inclusion is also supported by the 9 February 2026 Natural England representation and MD-LOT notes that the Developer has been provided with the Thompson, Russell and Morris 2017 seal tracking data. MD-LOT advises this data is considered when drafting the RIAA.

MD-LOT also highlights the 9 February 2026 Natural England representation that impacts on grey seal at the Berwickshire & North Northumberland Coast SAC as a result of changes in prey availability should be screened into the RIAA.

Offshore - Annex I Marine Ornithology

With regards to the identification of European sites and features, MD-LOT is broadly content with the screening criteria and 13.5km Zol identified in Section 3.1.4 of the HRA Screening Report. This is supported by the 9 February 2026 Natural England representation.

However, MD-LOT notes that the 26 January 2026 Natural England representation states the baseline description of the Teesmouth and Cleveland Coastal Special Protection Area (“SPA”) in section 3.1.4.20 of the HRA Screening Report is inaccurate. The little tern population’s current main nesting site is located at Seaton Carew, not Long Nanny.

With regards to applying the aforementioned screening criteria to identify European sites and features to be screened into the test of likely significant effects, MD-LOT highlights the following qualifying interests/SPAs omitted from Table 3.6 in the HRA Screening Report, as identified in the NatureScot representation:

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

Similarly, with regards to conclusions from the test of likely significant effects, MD-LOT highlights the following omissions from Tables 4.6 and 4.7 of the HRA Screening Report which are noted in the NatureScot representation:

- Great skua qualifying interest of the Handa SPA, Ronas Hill - North Roe & Tingon SPA and St. Kilda SPA; and
- Fulmar qualifying interest of the Cape Wrath SPA, Handa SPA, North Rona & Sula Sgeir SPA, Flannan Isles SPA and St. Kilda SPA.

In line with the NatureScot representation, MD-LOT advises that the aforementioned qualifying interests/SPAs should have been considered in the relevant Tables of the HRA Screening Report. However, MD-LOT agrees with the conclusion of no likely significant effects both for those qualifying features/SPAs that were included in Tables 4.6 and 4.7 of the HRA Screening Report and the omissions noted above. Consequently, no Annex I Marine Ornithology SPAs need to be considered further in the RIAA for the Proposed Development. This is in line with the NatureScot representation.

Onshore - Annex I Terrestrial Habitats

With regards to the identification of European sites and features, MD-LOT is broadly content with the screening criteria and 250 metre (“m”) Zol identified in Section 3.2.1 and Table 3.7 of the HRA Screening Report.

However, MD-LOT highlights the 9 February 2026 Natural England representation that indicates a 0.0km Zol has been applied when assessing if invasive non-native species have the ability to spread beyond the footprint of the Proposed Development. This is inconsistent with the Zol identified in the screening criteria. In line with the aforementioned Natural England representation, MD-LOT advises the Developer to review the assessments with the appropriate Zol for this impact pathway applied. Should likely significant effects be identified originating from the portion of the Proposed Development situated in Scottish waters, the designated site(s) affected should be assessed in the RIAA. MD-LOT advises that where instances of likely significant effects originating from the English section of the Proposed Development are identified, the Developer should contact Natural England, as the Statutory Nature Conservation Body for England, for advice.

The Developer concludes on the likelihood of significant effects resulting from the Proposed Development in Table 4.9 of the HRA Screening Report. To the extent that these

conclusions relate to the portion of the Proposed Development in Scottish waters, MD-LOT agrees with those conclusions reached by the Developer.

Onshore - Annex I Terrestrial Ornithology

With regards to the identification of European sites and features, MD-LOT is content with the screening criteria and 250m ZOI identified in Section 3.2.2 of the HRA Screening Report. MD-LOT is also content with the impact pathways considered in Table 4.10 of the HRA Screening Report, as supported by the 9 February 2026 Natural England representation.

The Developer concludes on the likelihood of significant effects resulting from the Proposed Development in Table 4.11 of the HRA Screening Report. To the extent that these conclusions relate to the portion of the Proposed Development in Scottish waters, MD-LOT agrees with those reached by the Developer.

Onshore - Annex II Terrestrial Flora

With regards to the identification of European sites and features, MD-LOT is content with the screening criteria and the 250m ZOI used in Section 3.2.3 of the HRA Screening Report.

MD-LOT notes that no sites designated for Annex II Terrestrial Flora were identified by these screening criteria. Consequently, MD-LOT is content with the conclusion in paragraph 3.2.3.5 of the HRA Screening Report that no such sites needed to be assessed for likelihood of significant effects resulting from the portion of the Proposed Development in Scottish waters. This is supported by Natural England's 9 February 2026 representation.

Onshore - Annex II Terrestrial Fauna

With regards to the identification of European sites and features, MD-LOT is content with the screening criteria, the 20km search buffer, and the 250m ZOI used in Section 3.2.4 of the HRA Screening Report.

MD-LOT notes that no sites designated for Annex II Terrestrial Fauna were identified by these screening criteria. Consequently, MD-LOT is content with the conclusion in Section 3.2.4 of the HRA Screening Report that no such sites needed to be assessed for likelihood of significant effects resulting from the portion of the Proposed Development in Scottish waters.

In-Combination Assessment

MD-LOT highlights the 9 February 2026 Natural England representation, which notes that effects from the Proposed Development alone which are likely but not be deemed significant will need to be considered in-combination with any similar effects from other concurrent projects which affect the same features. This is acknowledged in Section 5.1.1.1 of the HRA Screening Report. However, as screening for in combination effects is still underway, and the HRA Screening Report only considers effects of the Proposed Development alone the Developer will need to detail the full in combination screening process in the RIAA.

MD-LOT is broadly content with the in-combination assessment methodology proposed in Section 5.2 of the HRA Screening Report. However, MD-LOT notes that Table 5.2 of the HRA Screening Report will require updates following the Developer's review of this HRA Screening Opinion and its associated representations. This is in line with NatureScot and Natural England representations.

Yours sincerely,
Benjamin Taylor
Marine Directorate - Licensing Operations Team