

LICENCE AND CONSENT VARIATION – VALIDATION OF MARINE PROTECTED AREA ASSESSMENT

1 Licence Details

<u>Company Name:</u>	Green Volt Offshore Windfarm Ltd
<u>Project 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 Issued:</u>	19 April 2024
<u>Date of Existing Marine Protected Area (“MPA”) Assessment (“the Existing MPA Assessment”):</u>	11 January 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 (“DSL P”) 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 Variation Application 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 marine licence 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;
- No changes are proposed to the consented boundary of the export cable.

The Existing MPA Assessment considered the impact of Green Volt Offshore Wind Farm on the subglacial tunnel valley element of the quaternary of Scotland feature of the Southern Trench Nature Conservation MPA (“ncMPA”) due to direct impacts as a result of installation of the export cable. It concluded that Green Volt Offshore Wind Farm did not pose a risk of hindering the conservation objectives of the Southern Trench ncMPA.

Although it was identified that minke whale was capable of being affected due to disturbance as a result of construction of Green Volt Offshore Wind Farm, the disturbance was predicted to be insignificant and as such no further assessment was undertaken.

In relation to the remaining features, although the export cable corridor traverses the Southern Trench ncMPA, given their key locations relative to the physical location of the export cable there was limited potential identified for these features to be affected. As such, the remaining features were not taken forward for assessment in the Existing MPA Assessment.

As the Variation Application includes increased piling parameters for installation of the OSP, the Company has considered the impact on the minke whale feature of the Southern Trench ncMPA in Appendix 1 of the Section 36C Variation Screening Report submitted as part of the Variation Application.

The Company considered the possibility of disturbance and injury to the minke whale feature of the Southern Trench ncMPA as a result of underwater noise from impact

piling. The Company undertook updated underwater noise modelling which it considered showed that the predicted thresholds for potential auditory injury and disturbance to minke whale did not overlap with the boundary of the Southern Trench ncMPA. The Company concluded that given the distance between Green Volt Offshore Wind Farm and the ncMPA, the limited nature and scale of the piling activities and consequently the low number of minke whale potentially affected, there would be no potential for impact on the minke whale population of the Southern Trench ncMPA.

The Company did not consider the remaining features of the Southern Trench ncMPA as it concluded the Variation Application does not seek to change the parameters of the offshore export cable and consequently does not give rise to any new or materially different impacts to that which was originally assessed in the Existing MPA Assessment.

3 Summary of consultation responses – in relation to Marine Protected Areas (“MPAs”):

In accordance with Section 83(8) of the Marine (Scotland) Act 2010 and Section 126(10) of the Marine and Coastal Access Act 2009, NatureScot was consulted and provided a response on 04 February 2026.

NatureScot advised it is satisfied that the Variation Application will not give rise to any additional impacts capable of affecting, other than insignificantly, the protected features of the Southern Trench ncMPA and that the conclusions of the Existing MPA Assessment remain valid.

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

No other information has been received that would invalidate the conclusions or alter the outcome of the Existing MPA Assessment.

5 Conclusion - Consideration of whether the MPA Assessment completed for the original decision is still valid:

The Scottish Ministers conclude that the Existing MPA Assessment completed on 11 January 2024 remains valid in its conclusion that there is no significant risk of Green Volt Offshore Wind Farm hindering the achievement of the conservation objectives of the Southern Trench ncMPA.

Name	Assessor or Approver	Date
Benjamin Taylor	Assessor	05 February 2026
Jane Kidd	Approver	19 February 2026

