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11 June 2026

Dear Abby,

**Application by MachairWind Limited for Consent to Construct and Operate a Generating Station, MachairWind Offshore Windfarm**

MachairWind Offshore Windfarm (hereafter referred to as ‘the Project’) is wholly owned by ScottishPower Renewables (UK) Limited (‘SPR’). The Applicant for the Project is MachairWind Limited, a subsidiary of SPR.

The Applicant is pleased to submit an **application under Section 36 (s.36) of the Electricity Act 1989** for the construction and operation of an offshore generating station (‘MachairWind Offshore Windfarm’). The application covers the offshore generating station, which includes the wind turbines and their fixed foundations, and inter-array cabling. The applicant is also concurrently submitting applications for **one generation marine licence** and **one transmission marine licence** under the Marine (Scotland) Act 2010. All of these applications cover proposed infrastructure within a defined area known as the MachairWind Windfarm Development Area (WDA).

A declaration under Section 36A of the Electricity Act 1989 is being made with respect to proposed generating infrastructure within the WDA and would come into effect when any approval is given by the Scottish Ministers to the Development Specification and Layout Plan covering the WDA.

**Consenting Approach**

Due to grid connection delays associated with the National Electricity System Operator’s (NESO’s) Holistic Network Design (HND) process, for consenting purposes the Project has been split into three Development Areas for which separate consent applications will be sought by the Applicant for the respective infrastructure, namely:

- The Windfarm Development Area (WDA),
- The Offshore Export Cable Corridor (ECC); and,
- The Onshore Transmission Development Area (OnTDA).

An Environmental Impact Assessment (EIA) has been completed for the proposed WDA infrastructure in accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) and The Marine Works (Environmental Impact Assessment) Regulations 2017 (as amended). The **WDA EIA Report** (comprising Volumes 1 to 3) (**EIAR**) has been submitted as part of this consent application.

Whilst the submitted applications cover the WDA only, likely combined effects between the WDA, the Offshore ECC and the OnTDA have been considered insofar as practical based on currently available information. A combined assessment is provided in each technical topic of the **WDA EIAR**, commensurate with the level of detail available at the time of carrying out this assessment. The **EIAR** evaluates likely significant effects in two steps by considering the source, pathway and receptors for:

- The WDA alone; and,
- The WDA, Offshore ECC and OnTDA combined assessment.

This approach enables potential interactions between each Development Area to be identified and assessed, ensuring that a whole Project assessment is undertaken in a manner that is meaningful and proportionate. The combined assessment currently presented within the submitted **EIAR** will be taken forward and updated in subsequent EIAs to support consenting applications for infrastructure within the Offshore ECC and OnTDA.

### Overview of the Project

The WDA is located within the Scottish Marine Area and covers an area of 448 km<sup>2</sup>. The WDA infrastructure includes but is not limited to:

- Wind Turbine Generators (WTG), their associated fixed foundations and scour protection;
- Offshore Substation Platform(s) (OSP(s)), their associated fixed foundations and scour protection;
- Inter-array cables (IACs) and associated cable protection;
- OSP link cables (if required) and associated cable protection; and
- Portion of the offshore export cables located within the WDA and associated cable protection.

The Project will be operational for up to 35 years from completion of installation and commissioning of the WTGs.

An overview of the Project infrastructure covered by the Section 36 and two marine licence applications is set out in **Table 1.1** below. Further details are provided in **Chapter 3 Project Description** within the **EIAR**.

Table 1.1 Project Infrastructure

<b>Application</b>	<b>Offshore Infrastructure</b>
Section 36 Consent	<ul style="list-style-type: none"> <li>• WTGs, their associated fixed foundations and associated scour protection; and</li> <li>• IACs and associated cable protection.</li> </ul>
Generation Marine Licence	<ul style="list-style-type: none"> <li>• WTGs, associated fixed foundations and scour protection;</li> <li>• IACs and associated cable protection; and</li> <li>• OSP link cable(s) (if required) and associated cable protection.</li> </ul>
Transmission Marine Licence	<ul style="list-style-type: none"> <li>• OSP(s), associated fixed foundations and associated scour protection;</li> </ul>

Application	Offshore Infrastructure
	<ul style="list-style-type: none"> <li>• OSP link cable(s) (if required)* and associated cable protection; and</li> <li>• Portion of the offshore export cables located within the WDA, and associated cable protection.</li> </ul>

\*The Applicant is recommending that a condition be included within both the generation and transmission marine licences which secures installation of OSP link cables under only one of these marine licences. At this stage, it is not clear whether the OSP link cables will form part of the generation or transmission assets; therefore, this approach is intended to avoid the potential requirement for a marine licence variation following detailed design and prior to transfer of ownership of transmission assets to the Offshore Transmission Owner.

### Grid Connection Location

In August 2025 the Project’s grid connection location, which stems from NESO’s HND process, was confirmed to be in the vicinity of Girvan, South Ayrshire. The design features a High Voltage Direct Current (HVDC) connection from the Project to a switching station near Girvan which forms part of the wider Western Link 2 interconnector project between Kilmarnock South and Wales which is being taken forward separately by Transmission Owners ScottishPower Transmission and National Grid Electricity Transmission.

### Consent Validity Period

The Project has an existing grid connection date of September 2033; however, the timing of this connection is influenced by the energisation of the separate Western Link 2 project being developed by ScottishPower Transmission and National Grid Electricity Transmission, which is currently programmed for the mid-2030s. Accordingly, the Applicant anticipates it will soon be in receipt of a revised connection date of 2035, to align with the current target energisation timeframe for Western Link 2. However, there will remain continuing potential for delay to this energisation date, which will depend on the development of complex and novel HVDC technology and the constraints of global HVDC supply chains, with a conservative ‘risk range’ proposed for energisation out to 2038. Recognising the uncertainty that pertains to the Project’s final connection date and noting that the timing is wholly outside the Project’s control, the Applicant respectfully requests that the Project be granted an extended consent validity period of eight years. This would provide the Applicant with flexibility to accommodate external programme adjustments.

### Scoping Opinion and Report

A scoping process was undertaken in 2024-2025 to ensure that the EIA would be robust whilst also focused on aspects of the environment likely to be subject to likely effects. The Applicant has provided responses to the MD-LOT [Scoping Opinion](#) and the Statutory Consultation responses within the submitted **EIAR** and populated **Gap Analysis** spreadsheet.

### Consultation and Engagement

Throughout the development process, the Applicant has undertaken extensive statutory and non-statutory pre-application consultation, building and strengthening relationships with stakeholders and communities to support meaningful, informed and inclusive participation. Engagement commenced in advance of any formal consenting milestones and has been sustained throughout Project development.

The Applicant has delivered a series of focused and collaborative engagement activities with a wide range of stakeholders to seek, and incorporate where possible, specialist expertise into the EIA and wider Project decision-making process. This has included, but is not limited to, multiple Expert Topic Group meetings, Project Design workshops, and Navigational Risk Assessment workshops. This iterative approach has enabled the Applicant to work through complex issues with stakeholders, share interim and draft EIA findings, and discuss the development of mitigation measures. Further details of stakeholder engagement undertaken to date are provided in **Chapter 6 Consultation and Stakeholder Engagement** of the EIAR.

Engagement with the public and local communities has focused on the regular sharing of clear, transparent and accessible information, tailored to the interests and needs of the Project's host communities of Islay, Jura, Colonsay, Ross of Mull and Iona. Well in advance of the statutory consultation process, the Applicant implemented a multi-channel engagement approach to enhance awareness of the Project across the islands by sponsoring and attending community shows and festivals, issuing printed and online seasonal newsletters and encouraging informal dialogue with the Project's locally based Community Engagement Manager, who is based on Jura.

Community engagement included updates on the Project timelines, refinement of the Windfarm Development Area, enhanced visualisations, and information on potential environmental, social and economic impacts and benefits for local communities and the wider Argyll and Bute region. The Applicant proactively identified engagement barriers and communication preferences within and across communities, adapting its approach accordingly, to encourage participation from a broad cross-section of communities, and deliver outcomes that reflect communities' key interests, concerns and expectations. Further details of public and community engagement are provided in the **Pre-Application Consultation (PAC) Report**.

Statutory consultation has been undertaken in accordance with the Marine Licensing (Pre-Application Consultation) (Scotland) Regulations 2013. The Applicant has exceeded minimum regulatory expectations through the scope, duration and accessibility of consultation delivered. An extensive programme of statutory consultation was undertaken across two periods of Pre-Application Consultation, comprising:

- 12 in-person public consultation events across the Project's host islands;
- Two virtual consultation rooms, providing continuous online access to information;
- Two interactive online maps to support understanding of the Project's refined area and layout; and
- Four webinar events, enabling real-time discussion and participation for those unable to attend in person.

The Applicant's approach demonstrates a clear commitment to best-practice consultation and engagement, extending beyond statutory requirements to ensure that stakeholder and community feedback has meaningfully informed Project design, mitigation development and environmental assessment.

### **Compliance with the Habitats Regulation**

A Habitats Regulations Appraisal (HRA) has been completed pursuant to the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) and the Conservation of Habitats and Species Regulations 2017 (together, "the Habitats Regulations"), as documented within the submitted **HRA Screening Report** and **Report to Inform Appropriate Assessment (RIAA)**.

The Applicant's **RIAA** concludes that no Adverse effect on site integrity (AEoSI) would occur as a result of the Project, either alone or in-combination with respect to the ornithological features of any SPA. On this basis, it is the Applicant's position that the consenting applications for the WDA infrastructure do not require a derogation under the Habitats Regulations.

However, the Applicant recognises it is possible that the Scottish Ministers, acting as the relevant Competent Authority, may not reach the same conclusion as the Applicant in relation to one specific aspect of the **RIAA**, namely impacts on the guillemot feature of the North Colonsay and Western Cliffs SPA. In this event, a derogation from the Habitats Regulations would need to be undertaken and compensation may be deemed necessary. To accommodate this eventuality, the Applicant has prepared a **Without Prejudice Derogation Case** which accompanies the consenting applications. The Derogation Case has taken account of The Conservation of Habitats and Species (Offshore Wind) (Miscellaneous Amendments) (Scotland) Regulations 2026 which took effect on 25 May 2026.

The HRA related documents submitted therefore provide robust and complete information to enable the Scottish Ministers to grant the consenting applications for the Project in compliance with the Habitats Regulations.

#### **Documentation Enclosed**

A full list of the documentation accompanying the Project s.36 consent and associated marine licence applications is provided in **Appendix 1** of this letter. The Applicant wishes to highlight that the submitted documentation includes **Appendix 5 WDA Mitigation and Commitments Register**, which lists the suite of proposed EIA mitigation measures to be delivered through a series of implementation plans. These plans, which are expected to be secured under conditions attached to any consent and licences granted, are submitted in outline form at this stage and have been consulted on with relevant stakeholders during the pre-application stage. The Applicant also wishes to highlight that **Section 2.4.2 Approach to Conditions** within the submitted **Planning Statement** identifies several matters which the Applicant considers should be addressed within conditions attached to any consents and licenses granted, including to implement the design objectives outlined within **Appendix 15 Design Strategy** which have been developed in discussion with NatureScot. Additionally, the Applicant has developed a **Socio-economic Action Plan (SEAP)** which sets out how MachairWind will be developed, built and operated in a manner that maximises social, economic and wider benefits for its host island communities, Argyll and Bute, the West of Scotland, and Scotland more broadly. The **SEAP** is presented as a supporting document alongside the application and explains how opportunities and positive impacts can be maximised for the benefit of local communities and businesses.

#### **Confidential Documents**

The following item within the **EIAR** is considered a confidential document and will not be placed on public facing portals, publicly accessible physical locations as a printed copy, or anywhere else in the public domain: **Annex 11.3A of Appendix 11.3 Collision Risk Modelling**.

#### **Public Notices / Advertisements**

Following agreement with MD-LOT, in accordance with statutory requirements public notices advising that the Applicant has submitted applications for a s.36 consent and

accompanying marine licences, and inviting the public to submit comments on these applications, will be placed in the following publications on dates to be agreed:

- The Edinburgh Gazette
- The Herald
- The Oban Times
- Fishing News

The adverts will advise the public how to submit comments on the application during the public consultation period, in accordance with the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Electricity (Applications for Consent) Regulations 1990.

The application documents will be made available for the public to view in digital format by providing iPads at the locations listed below. Hard copies of the MachairWind Windfarm Development Area Environmental Impact Assessment Report – Non-Technical Summary and the Project visuals will also be available to view at the following locations:

- Islay Service Point, Jamieson Street, Bowmore, Isle of Islay, PA43 7HP
- Jura Service Point, Craighouse, Isle of Jura PA60 7XG
- Colonsay Service Point, Scalasaig, Isle of Colonsay, PA61 7YW
- Island Castaways, The Square, Bunessan, Isle of Mull PA67 6DG
- Iona Village Hall, Isle of Iona PA76 6SJ

Once the application has been accepted by MD-LOT, the application documents will also be published online on the Document Library of the MachairWind website at:

[Document library- ScottishPower Renewables - scottishpowerrenewables.comhttps://www.scottishpowerrenewables.com/offshore/machairwind](https://www.scottishpowerrenewables.com/offshore/machairwind)

Copies of the application documents can be made available on request. Digital copies will be subject to a charge of £15 on a USB stick (including postage and packaging). Hard copies will be subject to a charge of £1,000. Hard copies of the MachairWind EIA Non-technical Summary are available on request free of charge. Requests for copies of the application documents can be made at: [machairwind@scottishpower.com](mailto:machairwind@scottishpower.com)

The Applicant trusts that all of the necessary documentation has been provided to enable MD-LOT to swiftly validate the applications. However, should MD-LOT require any further information then please let me know.

Yours sincerely,  
[Redacted]

**Kiera Wilson**  
Development Lead  
MachairWind

## Appendix 1

- This cover letter to the s.36 consent application.
- Two marine licence application forms and supporting information.
- EIA Report:
  - Non-Technical Summary
  - Volume 1: EIAR Introductory Chapters (Chapter 1 to 6)
  - Volume 2: EIAR Technical Chapters (Chapters 7 to 22)
  - Volume 3a: EIAR Technical Appendices – Standalone:
    - Appendix 1 - WDA Scoping Report
    - Appendix 2 - WDA Scoping Opinion
    - Appendix 3 - WDA Scoping Validation Report
    - Appendix 4 - Gap Analysis
    - Appendix 5 - WDA Mitigation and Commitments Register
    - Appendix 6 - Outline Environmental Management Plan
    - Appendix 7 - Marine Pollution Contingency Plan
    - Appendix 8 - Invasive Non-Native Species Mitigation Plan
    - Appendix 9 - Draft Marine Mammal Mitigation Protocol
    - Appendix 10 - Fisheries Mitigation, Monitoring and Communication Plan
    - Appendix 11 - Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries
    - Appendix 12 - Outline Lighting and Marking Plan
    - Appendix 13 - Outline Vessel Management Plan and Navigational Safety Plan
    - Appendix 14 - Outline Carbon Management Plan
    - Appendix 15 - Design Strategy
  - Volume 3b: EIAR Technical Appendices – Introductory Chapters
  - Volume 3c: EIAR Technical Appendices – Technical Chapters
- Other Application Documents:
  - Pre-Application Consultation Report
    - PAC Appendices
  - Report to Inform Appropriate Assessment (RIAA)
    - Report to Inform Appropriate Assessment (RIAA) Part 1 Upfront Sections
    - Report to Inform Appropriate Assessment (RIAA) Part 2 Marine Mammals
    - Report to Inform Appropriate Assessment (RIAA) Part 3 Ornithology
  - Windfarm Development Area Habitats Regulations Appraisal Screening Report
  - Without Prejudice Derogation Case
  - Report to Inform Marine Protected Area Assessment
  - Planning Statement
  - Nature Positive Plan
  - Socio-economic Action Plan