



Spiorad na Mara Offshore Wind Farm

Offshore Project

Environmental Impact Assessment Report

Chapter 5: Approach to Environmental Impact Assessment, Volume 1a

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Contents

5	Approach to EIA.....	5-1
5.1	Introduction.....	5-1
5.2	EIA Process.....	5-5
5.3	EIA Screening	5-5
5.4	EIA Scoping.....	5-6
5.5	Preparation of the EIAR.....	5-8
5.6	Delivering Proportionate EIA.....	5-9
5.7	EIA Methodology	5-11
5.8	Cumulative effects assessment	5-18
5.9	Combined effects.....	5-28
5.10	Consideration of onshore transmission works	5-29
5.11	Transboundary effects.....	5-30
5.12	Consultation and Engagement	5-30
5.13	Glossary of terms and abbreviations.....	5-31
5.14	References	5-34

List of Tables

Table 5.1	Sensitivity definitions	5-15
Table 5.2	Impact magnitude	5-16
Table 5.3	Significance of effect definitions.....	5-17
Table 5.4	Significant of effect matrix.....	5-17
Table 5.5	Search area extents for the Offshore Project CEA.....	5-21
Table 5.6	Tiers used for screening and assessment of other developments offshore	5-23
Table 5-7	Screening extents for offshore CEA purposes.....	5-24
Table 5.8	Acronyms and abbreviations.....	5-31
Table 5.9	Glossary	5-31

5 APPROACH TO EIA

5.1 INTRODUCTION

5.1.1 OVERVIEW

- 5.1.1.1 This chapter outlines the processes followed for the Environmental Impact Assessment (EIA) of the Offshore Project in accordance with relevant legislation and guidance.
- 5.1.1.2 In accordance with European Union (EU) Directive on the assessment of the effects of certain public and private projects on the environment (EIA Directive) (European Parliament and Council, 2011) (2011/92/EU, as amended by Directive 2014/52/EU), an EIA is required to be prepared if a development is likely to have a significant effect on the environment due to factors such as its size, nature or location. The EIA Directive was implemented in the United Kingdom (UK) and Scotland by a series of statutory instruments. Following the UK's withdrawal from the EU on 31 December 2020, amendments have been made to the relevant EIA Regulations (outlined in paragraph 5.1.1.4), such that they continue to be effective and maintain the same standards of protection now that the UK is no longer part of the EU.
- 5.1.1.3 EIA is a systematic and analytical process for identifying, assessing and presenting the likely significant environmental effects (positive and negative) of certain proposed projects and the mitigation required to avoid, reduce, or offset these effects where possible. The EIA informs the decision-making process for development consent to be granted. In Scotland/*Alba*, the EIA process culminates in the provision of an EIA Report (EIAR) written in accordance with the applicable EIA Regulations as presented below.
- 5.1.1.4 In the case of the Offshore Project, the relevant EIA Regulations (collectively referred to as herein as the 'EIA Regulations') are as follows:
- *The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017*, with regard to the Section 36 (s.36) consent application for the Offshore Project;
 - *The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017* in relation to the Offshore Project with regard to the marine licence applications.
- 5.1.1.5 As outlined in **Chapter 1: Introduction, Volume 1a**, Spiorad na Mara Limited (hereafter referred to as 'the Applicant') is submitting separate consent applications for the Offshore Project and the Onshore Transmission Works (OTW) Project. This Offshore EIAR has been submitted to the Marine Directorate - Licensing Operations Team (MD-LOT) for the s.36 consent application and the marine licence applications for the Offshore Project. The Onshore Application will be submitted to Comhairle nan Eilean Siar (CnES) in relation to the application for permission for the OTW Project, as required by the Town and Country Planning (EIA) (Scotland) Regulations 2017.

5.1.1.6 **Appendix 5.1: EIA Regulations Requirements, Volume 1c**, shows where the information required by the EIA Regulations is included in this EIAR.

5.1.1.7 In addition to the legislative requirements listed above, guidance and best practice documents have been referred to in the production of a robust and proportionate EIAR (see Section 5.6). Where relevant, specific guidance and best practice documents for each of the offshore environmental topics (referred to as 'environmental aspects') are detailed in **Chapters 6 to 23, Volume 2a**. The EIAR has been undertaken in line with the following overarching EIA guidance documents:

- *Institute of Environmental Management and Assessment (IEMA) Environmental Impact Assessment Guide to Shaping Quality Development* (IEMA, 2015);
- *IEMA Environmental Impact Assessment Guide to: Delivering Quality Development* (IEMA, 2016);
- *Delivering Proportionate EIA, A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice* (IEMA, 2017);
- *Planning Advice Note (PAN) 1/2013 Environmental Impact Assessment* (Scottish Government, 2017a);
- *Environmental Impact Assessment Handbook: Guidance for competent authorities, consultees and others involved in the Environmental Impact Assessment process in Scotland* (Scottish Natural Heritage (now NatureScot) (SNH, 2018);
- *Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989* Scottish Government (2022a);
- *Guidance for Applicants on Using the Design Envelope for Applications under Section 36 of the Electricity Act 1989* (Scottish Government, 2022b);
- *Planning Circular 1/2017: Environmental Impact Assessment regulations* (Scottish Government, 2017b);
- *Offshore Wind Farms: Guidance Note for Environmental Impact Assessment in Respect of Food and Environment Protection Act 1985 and Coast Protection Act 1949 Requirements (Version 2)* (Centre for Environment, Fisheries and Aquaculture Science (CEFAS), 2004);
- *Marine licensing and consenting: offshore renewable energy projects* (Scottish Government, 2018);
- *Marine Licensing and Consenting: Offshore Renewable Energy Projects* (January 2025).

5.1.1.8 The assessment of the potential impacts for each of the individual environmental aspects is explained in detail within **Chapters 6 to 23, Volume 2a**. While the aspect assessments follow the general EIA process and methodology set out in this chapter, certain aspects have refined their approach to accommodate specific technical requirements are guided by the professional judgement and extensive experience of technical specialists, using relevant data. These refinements may be due to bespoke guidance (as discussed in each aspect chapter), unique environmental conditions, or regulatory requirements. For example, the shipping and navigation assessment adopts a risk assessment based approach. Other examples of bespoke guidance include climate

change resilience, endangered species protection, and historic preservation requirements. Any specific or detailed approaches, methods, or differences in the assessment criteria set out in Section 5.7 are defined in the relevant aspect chapters (**Chapters 6 to 23, Volume 2a**).

5.1.1.9 The remaining structure of this chapter is as follows:

- Section 5.2: EIA Process – sets out an overview of the key stages of the EIA process and the structure of aspect-specific assessment chapters;
- Section 5.3: EIA Screening – outlines the approach to EIA screening for the Offshore Project;
- Section 5.4: EIA Scoping – sets out the background to the scoping exercise undertaken for the Offshore Project;
- Section 5.5: Preparation of the EIAR – outlines the key steps involved in preparing the EIAR and the general structure of the aspect-specific chapters;
- Section 5.6: Delivering Proportionate EIA – describes how the Offshore Project has ensured a focused and proportionate EIA;
- Section 5.7: EIA Methodology – describes the general approach adopted in undertaking the EIA and reporting in this EIAR, including baseline and impact assessment outline methodology;
- Section 5.8: Cumulative Effects Assessment – this section details the approaches to the cumulative effects assessment for the offshore and onshore elements of the Offshore Project;
- Section 5.9: Combined effects – this section sets out how combined effects have been identified;
- Section 5.10: Consideration of OTW Project – this section identifies the need for a consideration of the OTW Project and inclusion within the assessment and how it is addressed in this EIAR;
- Section 5.11: Transboundary Effects – this section identifies the need for a transboundary effects assessment and how it is addressed in this EIAR;
- Section 5.12: Consultation and Engagement – the relevant consultation and engagement undertaken as part of the EIA for the Offshore Project, including with statutory and non-statutory stakeholders, as well as public consultation.

5.1.1.10 This chapter should be read in conjunction with the project description provided in **Chapter 3: Project Description, Volume 1a** and the relevant parts of the following chapters and appendices:

- **Chapter 2: Policy and Legislative Context, Volume 1a;**
- **Chapter 4: Consideration of Alternatives, Volume 1a;**
- **Appendix 5.1: EIA Regulations Requirements, Volume 1c;**
- **Appendix 5.2: Response to Scoping Opinion, Volume 1c;**
- **Appendix 5.3: Cumulative Effects Assessment Shortlisted Developments, Volume 1c;**
- **Appendix 5.4: Stakeholder Consultation and Engagement, Volume 1c.**

5.1.2 DESIGN EVOLUTION AND PROJECT DESIGN ENVELOPE

- 5.1.2.1 A key component of the EIA has been the design evolution process. This iterative process has created opportunities to develop environmental measures that are embedded into the Offshore Project's Design (see Section 5.7.4). As discussed in **Chapter 4, Volume 1a**, this process has involved stakeholder engagement, providing opportunities for stakeholders to give feedback, understand, and influence both the design and EIA process for the Offshore Project. The environment has been central to the design from the outset, as demonstrated by commitments, initially presented in the Scoping Report (MD-LOT, 2024), further developed through statutory consultation, and finalised for the application submission. These commitments are set out in **Chapter 25: Summary of Offshore Mitigation / Statement of Offshore EIA Commitments, Volume 2a**.
- 5.1.2.2 The EIAR adopts a parameter-based design envelope approach that is widely used and accepted for major infrastructure projects in the UK. Thus the EIAR reflects the potential impacts predicted on the baseline environment based on the Project Design Envelope (PDE). The PDE identifies the maximum design parameters that enable the EIA to be carried out whilst retaining sufficient flexibility within that envelope to accommodate further refinement during detailed design. Where flexibility must be retained for key design decisions such as choice of technology selected or alternative routing, a precautionary approach is applied through assessment of the maximum design parameters applied to defined scenarios which represent the worst-case scenario for each aspect assessed. The PDE and scenarios are set out in further detail in **Chapter 3, Volume 1a**.
- 5.1.2.3 The PDE identifies the parameters that enable the EIA to be carried out whilst retaining sufficient flexibility within that envelope to accommodate further refinement during detailed design. Where the design or technology is still evolving, a precautionary approach is applied, ensuring that the maximum design parameter is used in the PDE to represent the worst-case scenario for each aspect assessed. In using this precautionary approach to the assessment, the level of effect may be overstated and subsequently reduced at the time of construction, operation and decommissioning.
- 5.1.2.4 In using this precautionary approach to the assessment, the level of effect may be overstated and subsequently reduced at the time of construction, operation and decommissioning.
- 5.1.2.5 The technical chapters, **Chapters 6 to 23, Volume 2**, provide commentary on the appropriate maximum design scenario adopted for the assessment of each environmental aspect.

5.2 EIA PROCESS

5.2.1 KEY STAGES

5.2.1.1 The key stages of the EIA process are outlined in Scottish Government guidance (Scottish Government, 2017a) and can be summarised as follows:

- **EIA Screening** – determines the need for an EIA;
- **EIA Scoping** – defines the scope of work for the EIA including environmental aspects to be considered, describes the methodology of assessment (including design envelope parameters (refer to Section 5.1.2) and identifies potentially significant effects);
- **Preparation of EIA Report** – including outlining the maximum design scenario for each assessment (refer to Section 5.1.2); baseline studies, assessment of environmental effects, design iteration, development of mitigation and monitoring requirements, and evaluation of likely significant residual effects;
- **Application Submission and Consultation** – EIAR and consent application publicised and interested parties/the public given an opportunity to provide their views on it;
- **Decision-Making** – consent application determined by the competent authorities;
- **Post-Decision** – commencement of the Offshore Project including any environmental measures and monitoring required by the competent authorities.

5.2.1.2 The following sections provide more detail on the first 3 stages above.

5.3 EIA SCREENING

5.3.1.1 EIA Screening is the process used to determine whether an EIA is required for a project. Under the EIA Regulations¹, the Offshore Project is considered to be a Schedule 2 development. Schedule 3 of the EIA Regulations outlines the selection criteria for screening whether an EIA is required for Schedule 2 developments based on characteristics and location of the development, as well as the nature of potential impact.

5.3.1.2 Although a formal Screening Opinion was not sought, the Applicant has proactively decided to undertake an EIA based on the criteria within Schedule 3 of the EIA Regulations. This decision recognises the Offshore Project's potential for significant environmental effects and the need to adhere to regulatory obligations. Therefore, an EIAR has voluntarily been provided alongside the applications for consent.

¹ Schedule 2(1) of the Electricity Works (EIA) (Scotland) Regulations 2017, Schedule 2(2) of the Marine Works (EIA) (Scotland) Regulations 2017.

5.4 EIA SCOPING

Overview

- 5.4.1.1 A Scoping Report (Spiorad na Mara Limited, 2023) was prepared and submitted by the Applicant to MD-LOT in September 2023. Although the Applicant has not sought a separate scoping opinion from CnES for the OTW, they were consulted by MD-LOT as part of their Scoping Opinion, which concerns both offshore and onshore infrastructure associated with the Project.
- 5.4.1.2 The Scoping Report presented an anticipated Project area that included the following: Array Area, Offshore Cable Area of Search, Landfall, Landfall Substation Area of Search, Onshore Cable Corridor Area of Search, and Grid Substation Area of Search. The Project area at scoping defined where the Project and associated infrastructure would be located, including the temporary and permanent construction and operational work areas.
- 5.4.1.3 The Scoping Report (Spiorad na Mara Limited, 2023) outlined the anticipated Project components and activities associated with the Project during construction, operation, and decommissioning. It identified potentially significant effects associated with these activities, which would be assessed in more detail in the EIA (i.e. scoped-in). The Scoping Report also identified those effects that were unlikely to be significant and could therefore be scoped-out of the assessment.
- 5.4.1.4 A Scoping Opinion was received from MD-LOT in May 2024. The EIA Regulations² state that, where a Scoping Opinion is adopted, the EIAR must be based on it. The EIA Regulations also require that the Scoping Opinion must include the information that may reasonably be required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment.
- 5.4.1.5 The significant effects of the proposed activities on the surrounding environment identified from the Scoping Report have been scoped-in within the EIAR. Insignificant effects identified in the Scoping Report have been scoped-out of the EIAR taking account of the Scoping Opinion (MD-LOT, 2024).
- 5.4.1.6 The overall EIA process is iterative, with stages revisited as new information emerges. A key example is the design evolution process, which aims to influence the design and integrate embedded environmental measures following iterative environmental assessment. As a result, ongoing assessment and stakeholder engagement have led to updates in the Project design and final impact assessments in the EIAR, compared to what was provided for in the Scoping Report and Scoping Opinion.
- 5.4.1.7 In accordance with the mitigation hierarchy, efforts are made first to avoid or reduce potential significant environmental effects through iterative design alterations. This is presented as

² Regulation 6(3) of the Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017, and Regulation 5(3) of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017.

embedded mitigation (refer to Section 5.7.4) within each technical chapter of this EIAR. Since the initial scoping of the EIA, changes to the Project design within the anticipated Project area (at scoping stage) have been considered by the Applicant, in discussion with stakeholders (including NatureScot, CnES, Historic Environment Scotland, and local Community Councils), to reduce potential adverse environmental impact and embed mitigation. This is further detailed in **Chapter 4, Volume 1a**.

5.4.1.8 The Scoping Opinion and the statutory consultee responses have subsequently informed the assessment work and the evolution of the design of the Offshore Project. Responses to the Scoping Opinion comments, detailing how they have been addressed within this EIAR, are provided within each of the aspect chapters, and summarised in **Appendix 5.2: Response to Scoping Opinion, Volume 1c**. Whilst this does not include responses to every comments from consultation bodies, these responses have been considered in preparing the EIAR, with specific references to the relevant section or paragraph. A summary of the engagement undertaken as part of the EIA is set out in Section 5.12.

Consideration of major accidents and disasters

5.4.1.9 Within the Scoping Opinion, Scottish Ministers were content with the approach set out in the Scoping Report to consider the risk of environmental disasters to the Project and to identify any associated control measures to prevent or mitigate any potential accidents or events within the relevant environmental aspect chapters of this EIAR, rather than a standalone chapter.

5.4.1.10 Within the EIAR, effects associated with major accidents and disasters and considered within:

- **Chapter 7: Climate Change Resilience, Volume 2a** considers the resilience of the Offshore Project receptors to climatic events, over the whole project lifecycle, and identifies appropriate embedded environmental measures to mitigate that risk where relevant. The Project will be designed to operate within its environment, including during extreme environmental conditions such as storm events.
- **Chapter 16: Shipping and Navigation, Volume 2a**, across the Offshore Project lifecycle in the context of increased collision between multiple vessels, or increased collision risk between vessels and the array, exacerbated by loss of navigational aids during storm conditions. The assessment also considers the accessibility of emergency services to the Array Area should an accident occur.
- **Chapter 17: Military and Civil Aviation, Volume 2a** considers the potential increase in aircraft collision risk due to the creation of a new aviation obstacle in the environment, for air traffic within the vicinity of the Array area or aircraft using Stornoway/Steòrnabhagh. Similarly, the potential increase in collision risk due to an increase in air traffic, as a result of the use of helicopters during the Offshore Project lifecycle is assessed. Appropriate embedded environmental measures are defined and incorporated into the assessment to mitigate the risk of these events occurring.

5.5 PREPARATION OF THE EIAR

5.5.1.1 The preparation of the EIAR is one of the key stages in the EIA process as it brings together information about any likely significant environmental effects to help inform decision-making. The key steps within the 'Preparation of EIAR' stage for the Offshore Project have been:

- Gather information about the existing baseline environmental conditions in the study area and identify environmental constraints and opportunities which may influence, or be affected by the Offshore Project;
- Consider possible interactions between the Offshore Project and the existing and predicted future baseline conditions;
- Identify the PDE through iterative design evolution for assessment of effects;
- Identify and assess potential environmental impacts (direct, indirect, secondary, short-, medium- and long-term, permanent and temporary, beneficial and adverse), in relation to the sensitivity of the feature impacted and the magnitude of the impact predicted, that may arise from the construction, operation, and decommissioning of the Offshore Project, based on the available design parameters and embedded mitigation (see Section 5.7.4);
- Identify and assess the potential cumulative environmental effects (direct, indirect, secondary, short-, medium- and long-term, permanent and temporary, beneficial and adverse) that may arise from multiple effects from the Offshore Project on the same receptor group (combined effects) or from the Offshore Project in addition to other existing, planned, or reasonably anticipated future developments (cumulative effects);
- Identify and incorporate features and measures to avoid or mitigate adverse effects from the Offshore Project into the design, construction, operation and maintenance, and decommissioning phases of the Offshore Project;
- Assess the significance of any likely residual effects post-mitigation, in relation to the sensitivity of the feature and the magnitude of the impact predicted;
- Identify any requirements for monitoring the effectiveness of mitigation measures proposed, as proportionate to the nature, location and size of the Project, and the significance of its effects;
- Identify any uncertainties in the methodologies used, the predictions made, and the conclusions drawn during the assessment.

5.5.1.2 For the purposes of this EIAR, the term 'impact' is defined as a change that is caused by an action. For example, the laying of an Array Cable (action) is likely to result in seabed disturbance (impact). The term 'effect' is defined as the consequence of an impact. Using the Array Cable laying example, the laying of an Array Cable (action) results in seabed disturbance (impact), with the potential to disturb benthic habitats and species (effect).

5.5.1.3 Each aspect-specific chapter of the EIAR includes the following key sections:

- **Introduction** – outlines the structure and content of the chapter;

- **Summary of policy and legislative context** – outlines the legislation, policy and guidance specific to the aspect, providing supplementary information to the general policy and legislation outlined in **Chapter 2: Policy and Legislative Context, Volume 1a**;
- **Scoping and consultation** – describes EIA Scoping and the stakeholder consultation and engagement undertaken in relation to the aspect being considered;
- **Scope of the assessment** – describes the scope of the EIA assessment for the aspect being considered. It sets out the spatial study area, temporal scope, potential receptors that could be significantly affected, and potential impacts scoped into and out of the assessment;
- **Methodology for baseline data gathering and impact assessment** – sets out the ways in which baseline data collection has been undertaken (and the aspect-specific impact assessment methodology bespoke applied, outwith the generic approach to assessment);
- **Baseline conditions** – provides a summary of the current baseline conditions and anticipated future baseline;
- **Basis for EIA** – outlines the maximum parameters and assessment assumptions that have been identified relevant to the aspect being considered and a summary of embedded environmental measures;
- **Assessment of effects: construction; operation and maintenance; and decommissioning phases** – describes potential impacts, including receptor sensitivity, magnitude of impact, additional mitigation/monitoring proposed for predicted significant impacts and residual significance of effect following the application of mitigation;
- **Consideration of OTW Project** – describes potential effects of the Offshore Project aspects in addition with OTW Project aspects on the common receptors or resources;
- **Assessment of cumulative effects** – describes potential cumulative effects of the Offshore Project in addition to other developments on the same single receptor or resource;
- **Transboundary effects** – describes potential transboundary effects to another EEA State(s).
- **Summary of residual effects** – presents a summary of the assessment of potential significant impacts, any relevant mitigation measures, and residual effects (once all mitigation measures are taken into account);
- **References** – provides all sources that were cited throughout the chapter.

5.6 DELIVERING PROPORTIONATE EIA

5.6.1 OVERVIEW

5.6.1.1 Generally, in recent years, EIARs have grown in length and complexity placing additional burden on all parties including developers, stakeholders, and decision-makers. IEMA's guidance document *Delivering Proportionate EIA: A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice* (IEMA, 2017) outlines that "EIA is recognised as giving a voice to the environment, and increasingly social issues, in the consenting process. However, the drive for improved quality in EIA, combined with the UK's evidence-based and precautionary approach, has led

to substantial challenges for the future of practice." This has largely resulted in individual EIAs being too broadly scoped and EIARs being considered to be "overly long and cumbersome".

5.6.1.2 Planning Advice Note 1/2013: Environmental Impact Assessment (Scottish Government, 2013) also outlines that:

"EIAs should be fit for purpose. Excessively long, repetitive and poorly co-ordinated EIARs can prove a barrier to informed decision-making. EIARs are by their very nature technical documents, equally however they must be written in a manner that is accessible to the planning authority as the decision-maker; to the Consultation Bodies, and also to the public. Proportionality can best be achieved by seeking information from the planning authority and the Consultation Bodies on the scope of the assessment, paying attention to their views from the outset, and by focusing on the significant environmental effects of the proposed development. Developers and their agents, planning authorities and the EIA consultation bodies all have responsibilities in this respect."

5.6.1.3 Accordingly, it is largely recognised that delivery of more proportionate EIA will help to improve focus on the likely significant effects of a project and therefore, result in better informed decision-making. As such, to ensure that the EIA and resultant EIAR are robust and focused to help inform the decision-making process, the EIA has taken into consideration the advice provided in IEMA guidance (2017) and Planning Advice Note 1/2013 (2013) which aims to help ensure that 'proportionate' EIA is delivered in support of projects in the UK.

5.6.1.4 Conducting comprehensive scoping exercises, including early-stage scoping workshops with key stakeholders, has been crucial for delivery of a proportionate EIA. The scoping process of a project is important to help ensure that the EIA is proportionate and effective, as early identification of environmental aspects and likely significant effects to be assessed allows resources to be more efficient and focused on the significant issues. It is encouraged for developers to engage with stakeholders and planning authorities (Scottish Government, 2013) during the early planning and design stages of a project to ensure effective scoping of the EIA. To this end, a robust scoping exercise was carried out for the Project, including early-stage scoping and a comprehensive set of workshops with key stakeholders in 2023.

5.6.1.5 Robust scoping and identification of the key environmental issues within the Scoping Report ensured that the subsequent EIAR is focused on the key potentially significant effects as required by the EIA Regulations. This has helped to reduce unnecessary information and streamline the assessment process, making the EIAR more concise and effective. In addition, stakeholder engagement at the earliest stage at scoping and throughout the iterative EIA process has also made sure that the EIAR is proportionate, addresses key concerns and meets stakeholder expectations.

5.6.1.6 To ensure a focused and proportionate EIAR, effects considered to not be significant were identified and agreed to be scoped out of further assessment in the EIA during the scoping stage.

Full justification for scoping-out of effects and any amendments made since receipt of the Scoping Opinion is provided within each relevant aspect-specific chapter in this EIAR (see **Chapter 1, Volume 1a** for structure of the EIAR) and within **Appendix 5.2, Volume 1c**.

5.6.1.7 Alongside and informed by the scoping exercise, this EIAR has adopted an evidence-based approach to the collation of information that is appropriate and proportionate. Much of the data and information has been collated as part of the ongoing design development process (outlined in **Chapter 4, Volume 1a**), desk studies, environmental surveys, and from professional knowledge and experience of the EIA team relating to other relevant EIAs undertaken for similar developments and in the locality. This evidence base has been drawn upon to help develop the scope of the environmental assessments and establish the robustness of survey data collected for the EIA. The evidence base has been discussed with relevant stakeholders, as required, to ensure that it is appropriate. Further details are provided in aspect-specific chapters in this EIAR.

5.7 EIA METHODOLOGY

5.7.1 OVERVIEW

5.7.1.1 This section describes the general approach adopted in undertaking the EIA and reporting in this EIAR. Each individual environmental aspect chapter provides specific details of the methodology for baseline data collection and the approach to the assessment of effects. Reference should be made to aspect-specific chapters in this EIAR.

5.7.2 BASELINE ENVIRONMENT

5.7.2.1 Determining the current environmental conditions is a crucial part of the EIA process, as it establishes the existing state of the environment before any construction or installation activities for the Offshore Project begin. This baseline is used as a reference point to assess the potential impacts of the project during construction, operation and decommissioning. Information on existing conditions is gathered through desk-based research and surveys to establish a 'baseline' for comparing potential impacts resulting from the Offshore Project. Each aspect of the assessment is detailed in the individual chapters of the EIAR.

5.7.2.2 Additionally, it is important to evaluate whether baseline conditions are likely to change naturally over the Offshore Project's duration (in the absence of the Offshore Project), particularly regarding specific aspects or receptors. This is known as the future baseline. Changes may include the construction or operation of other planned or consented developments. Where such developments are built and operational at the time of writing and data collection, these have been considered to form part of the baseline environment. Otherwise planned future developments are considered within the assessment of cumulative effects.

5.7.2.3 The characterisation of the existing environment involves several key steps to ensure a comprehensive baseline for impact assessment. These steps include:

- Defining study areas for each receptor based on relevant characteristics (e.g., mobility/range);
- Reviewing available information, such as public data, reports, and site-specific surveys;
- Identifying potential impacts that may result from the proposed project;
- Assessing whether there is sufficient data to support confident EIA judgements;
- Targeting additional data collection to address key questions and fill critical gaps;
- Evaluating the gathered information to confirm that the environmental baseline is characterized in sufficient detail;
- Identifying any remaining data gaps or limitations and discussing their implications for baseline characterisation and the potential to materially influence the outcome of the EIA;
- Considering future baseline conditions and possible changes over the Offshore Project's lifespan, including factors like climate change and other foreseeable developments.

5.7.2.4 The specific methodologies for establishing a robust baseline for assessing potential impacts on each receptor are detailed in the aspect chapters of the EIAR. These methodologies have been informed by relevant guidance as well as feedback from the Scoping Opinion and consultation processes.

5.7.3 ASSESSMENT OF POTENTIAL EFFECTS

5.7.3.1 The identification and evaluation of effects is based on the information set out in **Chapter 3, Volume 1a**, environmental assessment good practice guidance documents and relevant aspect-specific guidance where available.

5.7.3.2 The EIA for the Offshore Project utilises the 'source-pathway-receptor' model to identify relevant receptors, where applicable. This model highlights potential impacts of the Offshore Project on environmental receptors, establishing a clear link between impact sources and receptor. The model comprises three key components:

- **Source**, the origin of potential impacts, such as offshore construction activities that may cause disturbance of sediment that becomes mobilised into the water column;
- **Pathway**, the route through which these potential impacts reach a receptor, such as re-deposition of sediment on the seabed;
- **Receptor**, the environmental element affected, which can include physical, ecological, or human components, such as water quality or benthic habitat (e.g. for the above example, immobile species on the seabed may be a receptor of deposition of sediment on the seabed).

5.7.3.3 An impact is considered to have an effect only if a pathway to a receptor exists; without an identifiable pathway, no effect is recognised (the potential effect for the example given in paragraph 5.7.3.2 would be the smothering effect). The Offshore Project may result in both negative and positive potential impacts, with the assessment process distinguishing between them

based on whether they are direct or indirect, secondary, cumulative, inter-related, short-, medium- and long-term, temporary or permanent. The significance of these effects, whether positive or negative, is determined using the methodology outlined in Section 5.7.5.

5.7.4 EMBEDDED ENVIRONMENTAL MEASURES

5.7.4.1 Good practice consideration and application of environmental measures involves a hierarchal approach, considering avoidance of negative effects as the primary objective. The iterative design evolution process followed has been driven by collaborative working between the design, environment and landowner teams, and in consultation with key stakeholders. This may have been through the consideration and adoption of alternatives or through measures incorporated within the Offshore Project design itself.

5.7.4.2 According to the IEMA (2016), mitigation measures can be categorised as follows:

- **Primary (inherent):** Measures integrated (or embedded) into the Offshore Project's design to reduce or avoid the likelihood or magnitude of negative environmental effects, such as location or design choices;
- **Secondary (foreseeable):** Additional measures implemented to further minimise environmental effects to 'Not Significant' levels (when appropriate), which are not part of the core design of the Offshore Project;
- **Tertiary (inexorable):** Measures required by standard practices or legislative requirements, independent of the EIA process, meaning they would be implemented regardless of the EIA findings.

5.7.4.3 Embedded environmental measures are primary or tertiary measures that are identified and incorporated into the design evolution of the Offshore Project to minimise potential environmental effects. These environmental measures are taken into account when assessing the magnitude of change and subsequent significance of effects, meaning they are assumed to be integral to the Offshore Project's design prior to any evaluation.

5.7.4.4 A Commitments Register has been used as the primary tool to capture and agree all embedded environmental measures and the mechanism of securing them. Measures are summarised in **Chapter 25, Volume 2a**. The EIAR is based upon the assumption that all these environmental measures will be implemented as part of the Offshore Project. Implementation of the embedded environmental measures relied upon in the assessment are secured in the consent conditions and through a series of outline management plans that are submitted with the EIAR (provided in **Volume 3**).

5.7.5 EVALUATING SIGNIFICANCE

- 5.7.5.1 The EIA Regulations, outlined in paragraph 5.1.1.4, mandate that the EIA determine the likely significant effects of the Offshore Project on the environment. Central to this process is determining whether a development is likely to significantly affect the environment, although the EIA Regulations do not explicitly define "significance." Therefore, the methods for identifying and evaluating potential impacts and effects must be transparent and verifiable. The primary focus of this EIAR is to communicate the significance of potential environmental effects to help inform decision-making.
- 5.7.5.2 The methodology presented here draws on current EIA principles and guidance from sources such as the IEMA; NatureScot, the Chartered Institute of Ecology and Environmental Management (CIEEM), and Marine Scotland's Consenting and Licensing Guidance for Offshore Energy Applications. Specific guidance relevant to each aspect is detailed in the corresponding chapters, which may diverge from the general methodology outlined.
- 5.7.5.3 For this EIAR, 'impacts' are defined as the changes resulting from an action, and 'effects' are defined as the consequences of potential impacts, which can be positive or negative. The assessments evaluate the significance of effects by taking into account the value or sensitivity of identified receptors, the magnitude of change to baseline conditions (impact magnitude), and any mitigation measures in place that are embedded into the Offshore Project.
- 5.7.5.4 The general process of evaluating significance is as follows:
- Establish the baseline conditions;
 - Identify the receptors and potential impacts, including duration and nature;
 - Define receptor sensitivity;
 - Define magnitude of change considering embedded environmental measures;
 - Evaluate effects and assign significance, combining value or sensitivity and magnitude of change;
 - Identifying measures to address any predicted adverse significant environmental effects;
 - Report effects.

Baseline

- 5.7.5.5 The first stage of the assessment involves establishing the baseline conditions upon which the assessment is based. Environmental impacts are compared to the conditions before the Offshore Project commences (the current baseline) and will also consider the projected future baseline (the theoretical situation without the Offshore Project), where possible. For instance, predictable changes like climate change or other expected changes based on reasonable assumptions and modelling are considered. Each aspect-specific chapter defines the baseline (current and future, where possible) against which the Offshore Project's environmental impacts are assessed.

Value or sensitivity of receptor

5.7.5.6 As outlined in paragraph 5.7.3.2, a receptor is an environmental aspect affected (either physical, ecological or human) by the Offshore Project. For each aspect in the EIAR, baseline studies and data collection have supported the identification of relevant receptors taken forward into the assessment. Each receptor is considered for value or sensitivity based on a range of factors including, but not limited to, nature, rarity, quality, fragility, replaceability, and importance of the resource and is generally determined by geographical context. Sensitivity also includes the capacity of the resource or receptor to accommodate changes, or to recover.

5.7.5.7 For the Offshore Project, value or sensitivity is categorised as either **negligible, low, medium, or high** (in accordance with the general definitions provided in **Table 5.1**), unless otherwise stated.

Table 5.1 Sensitivity definitions

Value/Sensitivity	Description
Negligible	Very low importance and rarity, local scale, very high potential for recovery
Low	Low or medium importance and rarity, local scale, high potential for recovery
Medium	Medium or high importance and rarity, regional scale, limited potential for recovery
High	High importance and rarity, national and/or international scale, limited potential for recovery

5.7.5.8 The approach to defining sensitivity may also vary for individual aspects. Aspect chapters provide further detail on specific value or sensitivity of receptors identified and taken forward in the assessments.

Magnitude of change

5.7.5.9 The magnitude of change (impact magnitude) is defined as the overall level of change in the environment, with consideration of several factors such as the extent over which that impact occurs, its extent, duration, likelihood, frequency, and reversibility. In particular, magnitude of change is determined based on how the following factors will impact the baseline conditions:

- Spatial extent – the geographical area over which the effect will occur. The spatial scope for each aspect assessment depends on the potential effects and the location of receptors that could be impacted. Relevant study areas for each environmental aspect are detailed in aspect-specific chapters (**Chapter 6 to Chapter 23, Volume 2a**) where applicable. The technical assessments consider:
 - The physical or developable area of the Offshore Project;
 - The characteristics of the baseline environment;
 - The manner and extent to which environmental effects may occur within or beyond the developable area.

- Temporal extent – the duration within which the impact will occur. The temporal scope refers to the time periods during which receptors experience impacts and effects, which can be permanent, temporary, long-term, or short-term. This scope has been determined for each aspect in consultation with relevant stakeholders and is outlined in relevant aspect chapters. The EIA evaluates effects during the construction, operation and maintenance, and, where applicable, decommissioning phases of the Offshore Project. More details on these phases are provided in **Chapter 3, Volume 1a**.

5.7.5.10 For the Offshore Project, magnitude of change is categorised as either **negligible, low, medium, or high** unless otherwise stated. Aspect chapters provide further detail on what represents a negligible, low, medium or high magnitude of change in relation to the individual aspect. The assessment of the magnitude of changes includes consideration of the embedded and good practice environmental measures that are part of the Offshore Project.

Table 5.2 Impact magnitude

Impact Magnitude	Description
Negligible	Very slight/no change to baseline conditions
Low	Minor loss/divergence from baseline conditions
Medium	Partial loss and/or alteration to qualifying/key elements and features of the receptor or receiving environment
High	Complete loss and/or alteration to qualifying / key elements and features of the receptor or receiving environment.

Significance of effects

5.7.5.11 As outlined in paragraph 5.7.5.1, the EIA Regulations require an EIAR to provide a description of the likely significant effects of a development on the environment. An effect is a consequence of an impact and is largely outlined as significance of effect which can be either positive or negative. Consequently, the significance of effect is evaluated through the consideration of the magnitude of the change/impact in combination with the value or sensitivity of the receiving environment (receptor) affected.

5.7.5.12 The magnitude of change/impact does not necessarily equate to significance of effect. As part of the evaluation, significance of effect is determined as either **negligible, minor, moderate, and major** with definitions provided in **Table 5.3**.

Table 5.3 Significance of effect definitions

Category	Definition	Significance
Negligible	No detectable change in the environment or receptor and no significant effect	Not Significant
Minor	A detectable but small-scale change to environment or receptor with no significant effect	Not Significant
Moderate	A detectable and fundamental change to environment or receptor resulting in a possible significant effect	Potentially Significant
Major	A fundamental change to environment or receptor resulting in a significant effect	Significant

5.7.5.13 As a general rule for this EIAR, the following applies:

- ‘Major’ effects are considered to be Significant;
- ‘Moderate’ effects are considered to be Potentially Significant;
- ‘Minor’ and ‘negligible’ effects are considered to be Not Significant.

5.7.5.14 However, professional judgement is applied, where appropriate, to determine significance of effect. Where effects are assessed, according to the matrix in **Table 5.4**, to be moderate and ‘Potentially Significant’ in EIA terms, professional judgement is applied to determine whether they are Significant or Not Significant.

5.7.5.15 Significance of effect in each of the aspect-specific chapters is described based on the general approach set out in the matrix provided in **Table 5.4**. Variations to the approach, which may be applicable to specific environmental aspects, for example based on specific standards and guidance, are detailed in each aspect-specific chapter where appropriate.

Table 5.4 Significant of effect matrix

		Sensitivity of Receptor/Receiving Environment to Change/Effect			
		Negligible	Low	Medium	High
Magnitude of Change/ Effect	Negligible	Negligible (Not Significant)	Negligible (Not Significant)	Negligible (Not Significant)	Negligible (Not Significant)
	Low	Negligible (Not Significant)	Negligible (Not Significant)	Minor (Not Significant)	Minor (Not Significant)
	Medium	Negligible (Not Significant)	Minor (Not Significant)	Moderate (Potentially Significant)	Moderate (Potentially Significant)
	High	Negligible (Not Significant)	Minor (Not Significant)	Moderate (Potentially Significant)	Major (Significant)

5.7.5.16 Residual effects are summarised in **Chapter 24: Summary of Likely Significant Residual Effects, Volume 2.**

5.7.6 DATA GAPS OR LIMITATIONS

- 5.7.6.1 Data gaps or limitations in the assessments are acknowledged in relevant aspect-specific chapters, especially if they hinder the determination of baseline conditions, receptor value or sensitivity or magnitude of change. A precautionary approach is adopted, ensuring that an impact cannot be deemed 'Not Significant' without sufficient supporting evidence. All data gaps or limitations are specified in the relevant aspect chapters.
- 5.7.6.2 While assessing significance of effect is inherently subjective, a defined methodology aims to enhance objectivity and consistency across aspects. Given the variability of environmental factors, some differences in the process may occur, and any deviations are noted in the aspect-specific chapters where relevant. The general evaluation process incorporates considerations of receptor value or sensitivity and magnitude of change, and embedded environmental measures designed to mitigate effects. Professional judgement, aligned with standards set by organisations such as CIEEM and the Landscape Institute, is applied where necessary, with further details provided in aspect-specific chapters of this EIA as applicable.
- 5.7.6.3 As the consent application for the OTW Project will be submitted separately to CnES, after the submission of the application for the Offshore Project, the OTW Project has not, at the time of writing this EIA, been subject to a full EIA. Therefore, consideration of the OTW Project in relation to whole project effects relevant to the Offshore Project EIA is based on the parameters of the OTW Project that are publicly available at the time of writing. Further details are included within **Chapter 3, Volume 1a.**

5.8 CUMULATIVE EFFECTS ASSESSMENT

5.8.1 OVERVIEW

- 5.8.1.1 The cumulative effects assessment (CEA) is a critical component of the EIA process. Its purpose is to evaluate the cumulative impacts of the Offshore Project alongside other relevant plans, projects, and activities on shared receptor groups or resources. This holistic approach ensures that the broader environmental implications are thoroughly understood and managed.
- 5.8.1.2 In this EIA, the term 'cumulative effect' refers to assessment of multiple impacts and activities from several developments which may have insignificant impacts individually but which together represent a significant cumulative effect.
- 5.8.1.3 This section outlines the legislative framework and guidance that underpin the CEA, as well as the methodology adopted to conduct the assessment. By adhering to these guidelines, we aim to

provide a comprehensive and transparent evaluation of the cumulative environmental effects associated with the Offshore Project.

5.8.2 LEGISLATION

5.8.2.1 The requirement for CEA is established under the EIA Directive (2011/92/EU, as amended by Directive 2014/52/EU) and transposed into domestic law through the EIA Regulations. The CEA has been carried in accordance with the EIA Regulations (Schedule 4 Paragraph (5) (e)) which require that the assessment of cumulative effects must consider the combined impacts of the Offshore Project with other existing and/or approved projects. The EIA Regulations (Schedule 4 Paragraph (5) for Electricity Works and Schedule 4, Paragraph (6) for Marine Works) also requires the assessment of “direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium- term and long-term, permanent and temporary, positive and negative effects of the development”.

5.8.3 GUIDANCE DOCUMENTS

5.8.3.1 Several guidance documents provide additional context and best practice for conducting CEA. These include:

- *A Handbook on Environmental Impact Assessment: Guidance for Competent Authorities, Consultees, and Others Involved in the Environmental Impact Assessment Process in Scotland* (NatureScot, 2018): This handbook offers comprehensive guidance on the EIA process, including the assessment of cumulative effects.
- *Environmental Impact Assessment for Offshore Renewable Energy Projects* (BSI, 2015): This document provides specific guidance for conducting EIA for offshore renewable energy projects, with a focus on cumulative impacts.
- *Renewable UK Cumulative Impact Assessment Guidelines: Guiding Principles for Cumulative Impacts Assessment in Offshore Wind Farms* (Renewable UK, 2013): These guidelines offer principles and best practices for assessing cumulative impacts in the context of offshore wind farms.
- *Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment* (PINS, 2025). This guidance builds on *Advice Note Seventeen: Cumulative Effects assessment* (PINS, 2025), to provide guidance on the assessment on cumulative effects.

5.8.3.2 By adhering to the legislative requirements and guidance documents, the CEA aims to provide a thorough and transparent evaluation of the cumulative environmental effects associated with the Proposed Development. This ensures that decision-makers have the necessary information to make informed choices that protect and enhance the environment.

5.8.4 METHODOLOGY

- 5.8.4.1 The CEA involves a systematic process to identify, screen, and evaluate the cumulative impacts of the Offshore Project alongside other relevant plans, projects, and activities. The long-list includes those in the UK and adjoining international jurisdictions and is based on publicly available information at the time of preparation. It considers both the scale of the other developments, and their potential to produce cumulative effects with the Project. This section outlines the methodology adopted for the CEA, ensuring a thorough and transparent assessment.
- 5.8.4.2 The PINS and RenewableUK guidance suggest that other developments that are deemed likely to go ahead or are going ahead (reasonably foreseeable) and for which sufficient information is available, should be taken forward for consideration. For the purposes of the CEA, the types of 'other developments' include:
- projects that are under construction;
 - projects that have planning permission or Marine Licences;
 - projects for which planning or Marine Licence applications have been submitted to the relevant authority;
 - projects that are reasonably foreseeable (e.g. projects identified in development plans, projects in other plans and programmes as may be relevant, offshore renewable energy projects that have a Crown Estate Agreement for lease, offshore renewable energy projects that have been scoped).
- 5.8.4.3 The CEA focuses on other developments in proximity to the Offshore Project which may have effects on the same resources and receptors. Generally, only other developments that require an EIA are included in the CEA. The CEA includes other developments that may begin construction, operation, or be decommissioned within the same period as the Offshore Project's construction, operation, or decommissioning.
- 5.8.4.4 The Offshore Project CEA considers impacts upon receptors during each project phase arising from the Offshore Project alongside all past (unless incorporated within the baseline), present or reasonably foreseeable projects, programmes or plans that result in an additive effect with any element of the Offshore Project. The assessment also considers the contribution of the Offshore Project to those impacts.
- 5.8.4.5 The other developments identified by each technical aspect as having a potential cumulative effect are detailed and assessed in **Chapters 6 to Chapter 22, Volume 2a**. The list of developments has been reviewed periodically as the EIA progressed to ensure that new developments which arise up until submission of the application for development consent were included in this EIAR.
- 5.8.4.6 The CEA methodology is generally divided into screening and assessment stages. The offshore screening approach followed Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (PINS, 2025) and Planning Inspectorate Advice Note

Seventeen (Planning Inspectorate 2025) which is an accepted process for major projects, with additional relevant aspects from the RenewableUK (RenewableUK and NERC, 2013) accepted guidance, which is specific to the marine elements of an offshore wind farm in consideration of mobile wide-ranging species (foraging species, migratory routes, etc.).

5.8.4.7 The CEA for each aspect is detailed in **Chapters 6 to Chapter 22, Volume 2a**. Further details on the short list of the other developments considered are set out in **Appendix 5.3: Cumulative effects assessment shortlisted developments, Volume 1c**.

Compiling the CEA long-list

5.8.4.8 The first step in the CEA process is to identify developments or activities that may interact with the Offshore Project and result in cumulative effects. This involves a comprehensive review of publicly available information to identify projects, plans, and activities which may interact with the Offshore Project across its construction, operation and maintenance, and decommissioning phases.

5.8.4.9 The longlist has been developed in consultation with the appropriate authority (MD-LOT) to identify which plans, projects and current activities should be included through examination of existing data sets (e.g. regulatory databases).

5.8.4.10 A specialised methodology has been employed to evaluate any potential interactions. This staged process considered the level of detail available for each project, plan, and activity, to determine its status and potential for physical, temporal, conceptual, or spatial interactions with the Offshore Project.

5.8.4.11 The search areas defined in **Table 5.5** have been applied during the development of the long list of 'other developments'. It should be noted that these initial screening ranges are based on what are considered to be the maximum extents of potential impacts from those activities and are therefore considered to be highly precautionary and professional judgement has been applied.

Table 5.5 Search area extents for the Offshore Project CEA

Infrastructure development or projects	Search area extent
Aggregate, dredging and disposal	Up to 50km from the Offshore Project Boundary.
Offshore energy (offshore wind)	Projects located in UK Waters or the Irish Sea.
Offshore energy (wave and tidal)	Up to 510km from the Offshore Project Boundary, or within species specific MU/SMU in Scottish waters.
Oil and gas	Up to 200km from the Offshore Project Boundary, or within the ICES Division West of Scotland/Alba (6a).
Cables and pipelines	Up to 200km from the Offshore Project Boundary.

Infrastructure development or projects	Search area extent
Military, aviation and radar	Up to 200km from the Offshore Project Boundary.
Coastal (Including harbour development)	Up to 200km from the Offshore Project Boundary.
Carbon Capture	Up to 200km from the Offshore Project Boundary.
Small-scale infrastructure development or projects	All categories of marine developments or projects up to 1km from the Offshore Project Boundary.

5.8.4.12 Operational offshore energy developments (including offshore wind farms) are included in the long list due to the potential pathway to cumulative effect with the Offshore Project, for aspects such as Offshore Ornithology. Otherwise infrastructure developments which are operational as of September 2025 are considered within the baseline of the relevant offshore aspect assessment.

5.8.4.13 There is a level of uncertainty with respect to the potential cumulative effects which may arise, as not all proposed projects or activities will take place or happen as currently described. To address this, the CEA considers:

- **Project Maturity:** Projects are categorised based on their stage of development (e.g., scoping, planning, construction, operation). More weight is given to projects that are further along in their development process;
- **Data Confidence:** The reliability of data is assessed, with higher confidence placed on information from projects with detailed and publicly-available design information;
- **Temporal Overlap:** The timing of potential impacts is evaluated to determine if they coincide with the phases of the Offshore Project, ensuring that cumulative effects are accurately assessed;
- **Spatial Overlap:** The geographical extent of impacts is considered to identify areas where cumulative effects may be more pronounced.

5.8.4.14 By incorporating these factors, the CEA aims to provide a realistic and comprehensive assessment of cumulative effects, accounting for the inherent uncertainties in Offshore Project development stages.

Tiered approach

5.8.4.15 The tiering structure used for screening and assessment of other developments is in accordance with both Planning Inspectorate's Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment (PINS, 2025) and Planning Inspectorate Advice Note Seventeen (Planning Inspectorate 2025) (**Table 5.6**). The Tiers are listed in descending order of level of detail likely to be available (and certainty of effects arising). Appropriate weight may therefore be given to each scenario (Tier) in the decision-making process when considering the potential cumulative impacts associated with the Offshore Project.

Table 5.6 Tiers used for screening and assessment of other developments offshore

Tier	Criteria
Tier 1	<ul style="list-style-type: none"> • other developments <i>“under construction;</i> • <i>permitted application(s), whether under the Planning Act 2008 or other regimes, but not yet implemented; and</i> • <i>submitted application(s), whether under the Planning Act 2008 or other regimes, but not yet determined.”</i>
Tier 2	<ul style="list-style-type: none"> • other developments <i>“on the Planning Inspectorate’s Programme of Projects where a Scoping Report has been submitted.”</i>
Tier 3	<ul style="list-style-type: none"> • other developments <i>“on the Planning Inspectorate’s Programme of Projects where a scoping report has not been submitted.</i> • <i>other developments identified in the relevant Development Plan (and emerging Development Plans - with appropriate weight being given as they move closer to adoption) recognising that there will be limited information available on the relevant proposals;” and</i> • <i>“identified in other plans and programmes (as appropriate) which set the framework for future development consents/approvals, where such development is reasonably likely to come forward.”</i>

5.8.4.16 In assessing the potential for cumulative effects from the Offshore Project, it is important to bear in mind that other developments, predominantly those ‘proposed’, may or may not be taken forward for development. Therefore, there is a need to build in a consideration of certainty (or uncertainty) with respect to the potential impacts which might arise from such proposals, in line with the approach set out by PINS in Advice Note Seventeen (2025). For example, other developments which are already under construction have a higher degree of certainty that will contribute to cumulative effects than those other development applications that are at an early stage.

5.8.4.17 For these reasons, all of the relevant other developments on the long list are allocated into ‘Tiers’, reflecting their current status within the planning and development process. This allows the CEA to present several scenarios, reflecting the varying levels of certainty of an activity proceeding and therefore the potential for impacts to arise that might act cumulatively with the impacts arising from the Offshore Project.

Screening of the CEA long-list

5.8.4.18 The first stage of the CEA produced a ‘long-list’ of other relevant projects, plans and activities (‘other developments’) happening within a Zol around the Offshore Project Boundary. Each aspect assessment within the EIAR has considered cumulative effects and undertaken an aspect-specific CEA that is reported in the corresponding chapter. Each assessment has defined an appropriate Zol for the assessment of cumulative effects, which is determined based on the largest study area relevant to specific environmental aspect, and is applied to the long list.

5.8.4.19 The screening stage involves evaluating the long list to determine the potential for cumulative effects. This is done on an aspect-by-aspect basis, ensuring that the potential for relevant receptor-impact pathways is identified. The screening criteria include:

- **Conceptual Overlap:** Identifying instances where an impact has the potential to directly or indirectly affect the receptor(s);
- **Physical Overlap:** Establishing the ability for impacts from the Offshore Project to overlap with those from other projects/plans on a receptor basis;
- **Temporal Overlap:** Determining if impacts from multiple projects occur simultaneously or sequentially, affecting the same receptors.

5.8.4.20 Projects, plans, and activities that meet these criteria are taken forward to the assessment stage for each aspect.

Aspect specific screening list – impact ranges

5.8.4.21 The screened long list identifies all the other developments that might give rise to cumulative effects when considered alongside the potential impacts arising from the Offshore Project but does not detail the differences in impact ranges for different environmental receptors.

5.8.4.22 In order to focus the aspect specific CEAs presented in **Chapters 6 to Chapter 22, Volume 2a**, the screened long list is subject to further aspect specific screening to identify those relevant other developments within the Zols of the Offshore Project for each aspect. The aspect specific screening distances used to refine the screened long list into aspect specific short lists (along with justifications for the distances used) are provided in **Table 5-7**.

Table 5-7 Screening extents for offshore CEA purposes

Aspect	Zol	Rationale
Socio-Economics	a. 'Local' study area; the Isle of Lewis b. 'Regional' study area; the Outer Hebrides	'Local' study area; the Isle of Lewis, and the 'Regional' study area; the Outer Hebrides considered the most likely areas within which cumulative effects may arise.
Climate Resilience	N/A	The Climate Change Risk (CCR) assessment is an assessment of the resilience of the Project to projected climate change. The resilience of the Project assets is unaffected by other developments.
Climate - Greenhouse Gases	N/A	Green House Gas (GHG) emissions have a global effect rather than directly affecting any specific local receptor to which a level of sensitivity can be assigned. The global climate is therefore the only receptor for the GHG assessment.

Aspect	Zol	Rationale
Physical and Coastal Processes	6 km	Zol/Study Area incorporates a 6 km buffer around the Offshore Project Boundary, which is a peak spring tidal excursion extent and thus the maximum extent of sediment transport from the Offshore Project. This extent is based on the understanding of likely effects, established from baseline investigations and assessment work and therefore the area within which cumulative effects may occur.
Marine Sediment and Water Quality	6 km	Zol/Study Area incorporates a 6 km buffer around the Offshore Project Boundary, which is a peak spring tidal excursion extent, and thus the maximum extent of sediment transport from the Offshore Project.
Benthic Ecology	6 km	Zol/Study Area incorporates a 6 km buffer around the Offshore Project Boundary, which is a peak spring tidal excursion extent, and thus the maximum extent of sediment transport from the Offshore Project.
Fish Ecology	A. 113 km B. coastal and offshore waters extending along the west coast of Scotland, from the southern extent of the Outer Hebrides to the mainland coast. C. 100 km	A. Marine Fish Study Area: 113 km at the furthest extent from the Offshore Project Boundary. The Marine Fish Study Area is defined through the modelled extent resulting from an impact piling applied an unmitigated, single-strike sound pressure level of 150 dB re 1 μ Pa (RMS). B. Diadromous Fish Study Area: coastal and offshore waters extending along the west coast of Scotland, from the southern extent of the Outer Hebrides to the mainland coast. This area is informed by published literature on the known or likely migratory pathways of the species relevant to the assessment. Due to the limited availability of detailed empirical data on migration routes and spatial ranges for some diadromous species, the defined area is relatively large, potentially exceeding the area of direct relevance. C. Basking Shark and oceanic sunfish Study Area: 100 km, to account for the highly mobile nature of these species, during seasonal presence within the region.
Marine Mammals	Offshore wind farms within species-specific MUs/SMUs, in Scottish Waters (piling noise impact pathways) Other offshore developments within the 100 km-radius Study Area	The EIA for marine mammals is based upon species-specific Zols. Cetacean Zols are based on species-specific marine mammal management units (MMMUs or MUs), while seal Zols are based on seal monitoring units (SMUs). As per the scoping response advice from NatureScot, the assessment considers the UK portion of marine mammal management units only, as this 'better reflects the likely size of populations affected by the potential impact pathways'. Four of the 14 species assessed for the Offshore Project have an MU or SMU restricted to the waters off the west coast of Scotland, while five species are part of the much larger Celtic and North Seas MU, and the remaining five have no defined MU. The cumulative assessment for population modelling of the five species parameterised for iPCoD screened in all Scottish offshore wind

Aspect	Zol	Rationale
	(other impact pathways)	farms within the respective MUs/SMUs, where sufficient information was publicly available (i.e. where a scoping or EIA report had been submitted at time of assessment). The wider cumulative assessment also considered other impact pathways with more localised effects, e.g. increased vessel traffic or pollution events, within the marine mammal study area (100 km radius of the Project); incorporating the coastal waters surrounding the northern part of Isle of Lewis/ <i>Eilean Leòdhais</i> and the body of water between the Isle and the Scottish mainland, known as The Minch/ <i>Mhaoil</i> .
Marine and Nearshore Ornithology	510 km	<p>The foraging range for gannet (509.4 km) is greatest for species assessed quantitatively in the CEA, defined in 'Population sizes for Biologically Defined Minimum Population Scales (BDMPS)</p> <p>For the pressures Artificial Light and Barrier Effect, the assessment has concluded that the Project Alone impact is negligible, and it is deemed that the effects are insignificantly impactful to lead to a significant cumulative or in-combination impacts on a population level. Therefore, species for which the only impact pathways identified were Artificial Light and/or Barrier Effect (specifically Northern fulmar and Manx shearwater) have been excluded from the CEA Screening process, and therefore other plans/projects which would only have had spatial connectivity due to these species have not been screened in.</p>
Marine Archaeology and Cultural Heritage	a. 2 km b. 60 km	Zol (a.) incorporates a 2 km buffer around the Offshore Project Boundary, which aligns with the Marine Archaeology Study Area (MASA). The MASA is industry standard and allows for the consideration of direct and indirect effects on Marine Archaeological and Cultural Heritage receptors and is designed to accommodate the potential imprecision of historic marine positioning. The Zol (b.) for the settings assessment incorporates a 60 km radius search area which aligns with the SLVIA ZOI.
Shipping and Navigation	50 nm	<p>50 nm is standard for shipping and navigation chapters / NRAs and which has been discussed at length with stakeholders. It is a distance at which influence of two cumulative projects can significantly impact a vessels route.</p> <p>Given the international nature of shipping, 50 nm is ample to identify other developments including offshore wind farms, wave/tidal developments, subsea cables/pipelines, and port/harbour developments that may be included in any cumulative effects relating to the Project. Any developments identified within the area would be tiered based on project type, project status, distance to the Project, level of concern during consultation, and data confidence. For there to be an impact there would also need to be a clear pathway i.e., a main</p>

Aspect	Zol	Rationale
		vessel route interacting with both the project and the cumulative project (base case and future case).
Civil and Military Aviation	a. 100 km b. 40 km	For military and civil aviation there are two zones of influence under consideration for relevant impacts. The first Zol (a) has considered offshore wind developments within a 100 km range of the turbine area. This distance is the maximum range at which radar cumulative effects are considered to occur. The second Zol (b) covers a distance of 40 km from the turbine area which is considered to be the range at which the cumulative effects from the creation of an aviation obstacle environment may occur.
Seascape, Landscape and Visual Impact	60 km	The Seascape, Landscape and Visual Impact Assessment (SLVIA) Study Area for the SLVIA is defined on the basis of the extent of potential significant effects arising from the Offshore Infrastructure of the Project by a radius of 60 km from the Offshore Project boundary, informed by the Zone of Theoretical Visibility (ZTV) and professional judgement.
Offshore Airborne Noise	15 km	A Zol has been applied to ensure direct and indirect cumulative effects can be appropriately identified and assessed. The construction offshore airborne noise Zol is a search distance of 15 km for offshore activities.
Commercial Fisheries	Zol incorporates the ICES Division West of Scotland/Alba (6a)	The use of the ICES Division West of Scotland/ <i>Alba</i> as the spatial extent for the cumulative Zol for the Offshore Project is appropriate as it captures the full range of relevant marine activities and receptor interactions for commercial fisheries. This area encompasses existing and planned offshore wind projects, MPAs, and fishing grounds along the west coast of Scotland/ <i>Alba</i> , including those adjacent to the Outer Hebrides/ <i>Na h-Eileanan Sià</i> . It reflects the operational range of vessels active within the Study Area, particularly static gear vessels such as creelers and scallop divers, as well as mobile gear vessels transiting between the west coast, east coast, and mainland ports. This spatial extent accounts for displacement patterns, seasonal movement of fleets, and access to overlapping grounds, ensuring that cumulative effects are assessed across the realistic area of influence for the affected fishing sectors. The zone is therefore considered representative and proportionate, reflecting where vessels currently operate and where displacement or redistribution of effort is most likely to occur.
Other Sea Users	A. 1 km B. 60 km	The Zol as identified within this chapter is determined by the Study Area, which encompasses the Array Area and Offshore Cable Area of Search plus a 1 km buffer (A) surrounding the Offshore Project, plus a ZTV covering a 60 km radius (B) from the Offshore Project to

Aspect	ZoI	Rationale
		encompasses an area for potential visual effects, which aligns with the SLVIA ZoI.
Offshore Human Health	a. 'Local' study area; the Isle of Lewis b. 'Regional' study area; the Outer Hebrides	'Local' study area; the Isle of Lewis, and the 'Regional' study area; the Outer Hebrides considered the most likely areas within which cumulative effects may arise.

Assessment Stage

5.8.4.23 All available information on the 'other developments' within the short list generated is collated to inform the CEA (see **Appendix 5.3: Cumulative effects assessment shortlisted developments, Volume 1c**). This list is aspect specific and presents all relevant plans, projects, and activities considered for each aspect's CEA.

5.8.4.24 The CEA methodology follows the Offshore Project assessment of effects methodology. Where the approach may differ between aspects based on their nature, the cumulative projects included, the available data, and practical considerations this is reported in each aspect-specific chapter. Both qualitative and quantitative assessments are employed as appropriate.

5.8.4.25 Where the potential significant effect for the Offshore Project alone is assessed as negligible, or where an impact is highly localised, these are generally excluded from the CEA. This exclusion is confirmed at an aspect-specific assessment level.

5.8.4.26 As part of each aspect's assessment, a review is undertaken of each of the 'other developments' in turn to assess whether cumulative effects may arise. This also includes, where relevant, any environmental measures where negative cumulative effects have been identified and clearly signposts to the relevant means by which required mitigation will be secured.

5.8.4.27 In developing potential environmental measures that may be required of the Offshore Project in relation to cumulative effects, appropriate consideration of measures likely to be implemented by the proponents of other developments to address effects arising from those developments has been undertaken to ascertain the contribution of each development to the effect (using professional judgement).

5.9 COMBINED EFFECTS

5.9.1.1 Combined effects refer to the inter-relationships between environmental aspects that may lead to different or greater environmental effects than in isolation. Such effects are concerned with the likely significant effects from multiple impacts and activities from construction, operation, and maintenance, and decommissioning of the Offshore Project on the same receptor, or group of receptors. For instance, a biological receptor might be affected by the temporary disturbances from

vessels used for construction activities and increased sediment in the water. The combined impact of these effects can be more significant than each individual effect on its own. The combined effects assessment is presented in **Chapter 23: Combined Effects Assessment, Volume 2a**.

5.9.1.2 It is not necessarily the case that the maximum adverse impact in terms of any one aspect impact would automatically result in the maximum potential impact when a number of aspect impacts are considered collectively. In addition, individual impacts may not be significant but could become significant when their inter-relationship is assessed.

5.9.1.3 Combined effects can arise in the following ways:

- **Project lifetime effects:** assessment of the scope for effects that occur throughout more than one phase of the project (i.e. construction, operation and maintenance, decommissioning), to interact to potentially create an effect of greater significance than if assessed just within individual/isolated project phases;
- **Receptor led effects:** through the combined impacts of multiple factors on a single receptor (or group). These effects are identified by examining potential interactions, spatially and temporally, associated with the Offshore Project. Receptor-led effects might be short-term, temporary or transient effects, or incorporate longer term effects.

5.9.1.4 The assessment identifies any significant residual combined effects (and non-significant effects, greater than negligible or neutral significance, which could combine to create a perceivably significant effect) on common receptors or receptor groups set out in individual aspect assessments. It provides a qualitative statement on the potential for actual or perceived significant residual effects for such receptors. Each technical chapter (**Chapter 6 to 22, Volume 2a**) provides further detail on the methodology and assessment of combined effects for the relevant receptors.

5.10 CONSIDERATION OF ONSHORE TRANSMISSION WORKS

5.10.1.1 As described in **Chapter 1, Volume 1a**, the Project is comprised of both the Offshore Project and the OTW Project, that are being consented separately under different consenting regimes, with the Offshore Project being the focus of this EIAR.

5.10.1.2 To ensure the Offshore Project and OTW Project are considered holistically and not in isolation of each other, consideration is given within the environmental aspect chapters (**Chapter 6 to 22, Volume 2a**) to instances where OTW Project has the potential to interact with effects arising as a result of the Offshore Project, at the same receptor or receptor group. This interaction has the potential to result in an effect which is of a greater magnitude than when experienced alone.

5.10.1.3 There are a limited number of environmental aspects within this Offshore EIAR where there is a feasible pathway for this interaction to occur, due to them being largely experienced in the marine environment. However, a pathway may be present where the aspect is not limited to the marine environment, such as Socio-Economics, where effects may be experienced onshore too. The

environmental aspect has considered the potential of these effects, based on the level of information available at the time of assessment pertaining to the OTW Project. A summary of the relevant OTW Project information is included in **Chapter 3, Volume 1a**.

5.11 TRANSBOUNDARY EFFECTS

- 5.11.1.1 Transboundary effects occur when a development in one European Economic Area (EEA) State impacts the environment of another EEA State(s). The '*Convention on Environmental Impact Assessment in a Transboundary Context*' (Espoo Convention, 1991), adopted by the United Nations Economic Commission for Europe to enhance the cooperation between EEA states in assessing environmental effects in a transboundary context.
- 5.11.1.2 The Espoo convention has been incorporated into the EIA Regulations³. These regulations outline the processes for consultation and notification. If a project is expected to cause significant transboundary effects, the EIA Regulations require Scottish Ministers to engage with the affected EEA State and invite them to participate in consultations.
- 5.11.1.3 Although the Scoping Report did not identify any potential transboundary interactions based on the information available in 2023, transboundary effects have been considered further as part of the EIA. Where potentially significant transboundary effects are predicted to arise from the Offshore Project, they are evaluated and described in the relevant aspect-specific chapter. If no transboundary effects are predicted, this is also noted.

5.12 CONSULTATION AND ENGAGEMENT

- 5.12.1.1 Effective stakeholder consultation and engagement is an important pillar of the development of any project, from inception and throughout the Project lifecycle. Consultation allows for the Applicant to communicate Project details and milestones and for regulator, stakeholder and public feedback to be incorporated into the Project decision-making process and design.
- 5.12.1.2 Best practice in EIA encourages consultation and engagement with stakeholders early in the process, with advice and input from key consultees being sought at the early design stages of a project, to inform decisions about the Project. **Appendix 5.4: Stakeholder Consultation and Engagement, Volume 1c** provides an overview of the consultation and engagement that has been undertaken for the Offshore Project, and this is described in further detail in the **Offshore PAC Report**.

³ The regulations that the Espoo convention have been incorporated into are Regulation 29 of the Electricity Works (EIA) (Scotland) Regulations 2017, Regulation 30 of the Marine Works (EIA) (Scotland) Regulations 2017.

5.13 GLOSSARY OF TERMS AND ABBREVIATIONS

5.13.1.1 A list of key terms and acronyms used in this Appendix are provided in **Table 5.8** and **Table 5.9**.

Table 5.8 Acronyms and abbreviations

Term	Definition
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
HDD	Horizontal Directional Drilling
HRA	Habitats Regulations Assessment
IEMA	Institute of Environmental Management and Assessment
MD-LOT	Marine Directorate – Licencing Operations Team
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
OCAS	Offshore Cable Area of Search
OSP	Offshore Substation Platform
OTW Project	Onshore Transmission Works Project
OWF	Offshore Wind Farm
PAN	Planning Advice Note
PDE	Project Design Envelope
UXO	Unexploded Ordnance
WTG	Wind Turbine Generators

Table 5.9 Glossary

Term	Definition
the Applicant	Spiorad na Mara Limited (the Project owner)
Array Area	The offshore area within which the offshore wind turbine generators (WTGs), associated foundations, Offshore Cables, and Offshore Substation Platform (OSP) (if required), will be located. This area encompasses the Turbine Area that will contain all above water surface infrastructure (WTGs / OSP) and an additional area within which further below water infrastructure (foundations and cables) may also be located.
Array Cables	The offshore electrical and communication cables that connect infrastructure located within the Array Area, for: <ul style="list-style-type: none"> Scenario 1: Array Cables will used to connect Wind Turbine Generators (WTGs) to each other, and to connect WTGs to the OSP. Scenario 2: Array Cables will used to connect WTGs to each other.
Array Cables to Landfall	The offshore electrical and communication cables located in the Array Area and Offshore Cables Area of Search that connect the wind turbine generators (WTGs) directly to Landfall for Scenario 2.

Term	Definition
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the importance, or sensitivity, of the receptor or resource in accordance with defined significance criteria.
Environmental Impact Assessment Report (EIAR)	The Environmental Impact Assessment Report (EIAR) prepared to assess the likely significant effects of the Project on the environment.
Export Cable	The offshore electrical and communication cables located in the Array Area and Offshore Cables Area of Search that connect the Offshore Substation Platform (OSP) (if required) to Landfall for Scenario 1.
Embedded or 'Designed-in' Mitigation	Mitigation measures to avoid or reduce environmental effects that are directly incorporated into the preferred design for the Project. This can include standard practice in accordance with or without guidance. Embedded Mitigation is considered as part of the impact assessment, before effect significance is identified
Landfall	This consists of works from offshore Horizontal Directional Drill (HDD) exit pits (located below MLWS) to onshore at the Transition Joint Bays (TJB) (located above MHWS). The infrastructure and installation methods associated with the Landfall involves both onshore and offshore components.
Offshore Application	The application for a marine licence under the Marine (Scotland) Act 2010 (between 0 and 12nm) and a Section 36 consent under the Electricity Act 1989.
Offshore Cables	Electrical and communication cables located within the Array Area and Offshore Cable Area of Search. The Offshore Cables consist of Array Cables, Array Cables to Landfall, and Export Cables.
Offshore Cable Area of Search (OCAS)	The area within which the offshore cable infrastructure between the Array Area and Landfall up to Mean High Water Springs (MHWS) will be located.
Offshore Project	The offshore components of the Spiorad na Mara offshore wind farm (the Project) located seaward of Mean High Water Springs (MHWS).
Offshore Project Boundary	The 'red line boundary' encompassing the Offshore Project.
Offshore Substation Platform (OSP)	The optional offshore substation located within the Turbine Area. Includes the platform and associated components which allows the voltage to be increased to meet onward transmission requirements.
Onshore Transmission Works (OTW) / Onshore Project	The onshore components of the Spiorad na Mara offshore wind farm (the Project) located landward of Mean Low Water Springs (MLWS). The Applicant will seek consent for the OTW Project through a separate application and so does not form part of this application.
Project	The Spiorad na Mara offshore wind farm development. This term describes the whole development, including all offshore and onshore components.
Project Design Envelope	A description of the range of possible components that make up the Project design options under consideration when the exact engineering parameters are not yet known.

Term	Definition
Scoping Opinion	A report presenting the written opinion of the Scottish Ministers, with input from Comhairle nan Eilean Siar (CnES) for the OTW, as to the scope and level of detail of information to be provided in the Environmental Impact Assessment (EIA) for the Project.
Turbine Area	A reduced area within the Array Area where above water surface infrastructure would be located i.e. wind turbine generators (WTG) or Offshore Substation Platform (OSP) (if required). This area has been developed and refined through stakeholder consultation and environmental assessment.
Wind Turbine Generator (WTG)	The wind turbines that generate electricity consisting of tubular towers and blades attached to a nacelle housing mechanical and electrical generating equipment

5.14 REFERENCES

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