Spiorad na Mara Offshore Wind Farm

Offshore Project

Environmental Impact Assessment Report

Chapter 25: Summary of Offshore Mitigation / Statement of Offshore EIA Commitments, Volume 2a

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25.1 INTRODUCTION

25.1.1.1 This chapter presents the summary of environmental mitigation measures and statement of commitments proposed for the Offshore Project from relevant technical assessments **Chapters 6: Socio-Economics, Volume 2a** to **Chapter 23: Combined Project Effects Assessment, Volume 2a** of the Environmental Impact Assessment Report (EIAR) where environmental effects of the Offshore Project have been assessed.

25.1.1.2 The tables below present measures on an aspect by aspect basis, and outline the measures identified, the phase of the Offshore Project the measure will be required, how the measure is to be secured, and the relevance of the mitigation measure to the aspect.

25.1.1.3 The summary of mitigation measures and statement of commitments tables are as follows:

- **Chapter 6: Socio-Economics, Volume 2a – Table 25.1;**
- **Chapter 7: Climate Resilience, Volume 2a – Table 25-2;**
- **Chapter 8: Climate Greenhouse Gases, Volume 2a – Table 25-3;**
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Table 25.1: Summary of commitments and mitigation measures for Socio-Economics

ID	Application	Commitment	Relevance to Socio-economic Assessment	Project Phase Measure Introduced	Securing Mechanism
Embedded mitigation					
M020	Offshore	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Relevant to the approach taken to the assessment of effects during decommissioning, set out in **Chapter 6, Volume 2a**; Section 6.10.	Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004
M037	Offshore	Use of local tour operator vessels or fishing vessels that meet relevant safety requirements, where possible to assist future Project activities, such as guard vessel opportunities.	Relevant to the assessment of effects on the tourism sector (in relation to recreational fishing and angling tours).	Pre-Construction and Construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.
M041	Offshore	The offshore construction workforce to be accommodated on vessels, with the exception of certain limited circumstances such as crew change over and leave, to reduce additional demand for housing / tourist accommodation on Lewis/*Eilean Leòdhais*. Medical facilities to be provided on board vessels to treat minor injuries / illness and reduce additional pressure on existing services.	Relevant to the assessment of effects on the tourism sector, housing, population change, community services and infrastructure, availability of transport, and culture and identity.	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.
M042	Whole Project	Project to work with key stakeholders and service providers to understand pressure points on existing services and on storage / port facilities on Lewis, and charter vessels and/or flights to transport crew and materials where required to avoid creating excess	Relevant to the assessment of effects on the tourism sector, the transport and storage sector, and on the availability of transport.	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.

ID	Application	Commitment	Relevance to Socio-economic Assessment	Project Phase Measure Introduced	Securing Mechanism
		pressure, and potentially provide additional capacity. Large construction components to be transported by specialist vessels via private charter. The Project will engage with other developers on opportunities to collaborate on transport services and storage facilities, including through the Renewable Energy Major Developments Forum[1].			
M044	Whole Project	The Project is committed to the establishment of a Community Panel (subject to agreed community participation), comprising a range of community representatives with relevant experience and local knowledge. The purpose of the panel will be to ensure that local voices and perspectives can inform delivery of the Project as it progresses. It is proposed that the panel would be in place prior to the commencement of major construction activities and would be maintained throughout construction and commissioning. During operation, the Project will continue to engage with local communities and will provide opportunities for local residents to contact the Project team, including through dedicated resources within the	Relevant to the assessment of effects on culture and identity.	Construction, Operation and Maintenance	To be secured through a condition of the Section 36 consent and/or Marine Licence.

[1] The Renewable Energy: Major Developments Forum is a collaborative forum involving the private sector developers of proposed/planned renewable energy projects in Lewis and the public sector agencies working on, and in support of, the island. Its purpose is to identify and focus on areas of joint strategic purpose to provide co-ordinated action in pursuit of smooth project implementation; the identification of related growth opportunities, the maximisation of community benefits and the identification, minimisation, and mitigation of any arising challenges. The members of the forum are: Scottish and Southern Energy Networks, BayWa.r.e, Stornoway Wind Farm, Eurowind, Northland Power, Magnora Offshore, Comhairle nan Eilean Siar, Highlands and Islands Enterprise, and University of the Highlands and Islands. The forum meets on a quarterly basis, at a minimum, with sub-groups meeting in between to progress collaboration on specific topics.

ID	Application	Commitment	Relevance to Socio-economic Assessment	Project Phase Measure Introduced	Securing Mechanism
		operation and maintenance team with responsibility for community engagement.			
M045	Whole Project	A Cultural Integration Plan will be developed prior to the commencement of construction which will put in place measures to support the integration of incoming workers and reduce impacts on local communities and cultural practices. This will include the continuation of awareness training and on island induction for all project staff and contractors, and the use of a settlement officer to support cultural integration during construction and operation and maintenance.	Relevant to the assessment of effects on culture and identity.	Construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.
M048	Whole Project	The Project is committed to maximising opportunities for local businesses to compete for contracts on the Project, and will continue to support the development of the local supply chain to develop the skills and capacity needed to construct and operate the Project. In advance of construction, the Project will: • engage with local suppliers to understand local capabilities; • make suppliers aware of opportunities associated with the construction of the Onshore Project, when these will arise, and what the requirements are likely to be; • develop tender criteria to promote local content and the use of local contractors and suppliers in onshore construction works.	Relevant to the assessment of socio-economic impacts and wider socio-economic effects.	Construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.

ID	Application	Commitment	Relevance to Socio-economic Assessment	Project Phase Measure Introduced	Securing Mechanism
		The SCDS for the Project will be routinely updated, providing a record of the Project's supply chain commitments and ambitions.			
M049	Whole Project	The Project is committed to maximising opportunities for local people to apply for jobs created by the Project, and will continue to work with the supply chain and other local stakeholders to develop the workforce skills required for the construction and operation of the Project. In advance of construction, the Project will support skills development initiatives, and will work with stakeholders and other agencies such as HIE on wider skills development initiatives. The Project will also develop tender criteria to promote local skills and employment.	Relevant to the assessment of socio-economic impacts and wider socio-economic effects.	Construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.
Secondary mitigation					
A004	Whole Project	The Project has already engaged with Outer Hebrides Tourism (also known as Visit Outer Hebrides), and is committed to developing a Tourism Support Strategy, through which it can – in consultation with Outer Hebrides Tourism and other relevant stakeholders – support existing tourism initiatives and, where appropriate, collaborate to explore new opportunities for tourism on the islands, in particular in the area of ecotourism associated with renewable energy. Other specific initiatives the Project will include in such a strategy include: • consultation with local organisations to discuss opportunities to enhance the Multiuse Pathway	See **Chapter 6, Volume 2a**; Section 6.9.2.	Construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.

ID	Application	Commitment	Relevance to Socio-economic Assessment	Project Phase Measure Introduced	Securing Mechanism
		along Barvas Moor Road that will be delivered as part of the Onshore Project; • opportunities to incorporate learning and visitor opportunities into the Operations and Maintenance Base; • potential for information stops along the west coast of Lewis to showcase the area's cultural heritage and biodiversity, subject to consultation with CnES and further planning approval if required.			

Table 25-2 Summary of commitments and mitigation measures for Climate - Climate Resilience

ID	Design and operational management measure proposed	Offshore Project phase measure introduced	How the environmental measures will be secured	Relevance to Climate Resilience assessment
Embedded measures				
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline Offshore Environmental Management Plan, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-Construction, construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	The OEMP will be used for the implementation of appropriate environmental management and control measures during the construction phase of the Offshore Project. The OEMP will follow industry best practices to limit weather-related impacts which may affect the construction programme, cause damage to plant and equipment, or create unsafe working conditions.
M020	A Decommissioning Plan will be developed prior to the construction of the Offshore Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004.	The Decommissioning Plan will follow industry best practices to limit weather-related impacts which may affect the decommissioning programme, cause damage to plant and equipment, or create unsafe working conditions.
M025	A final Operational & Maintenance (O&M) Plan (building on **Outline Offshore Operational & Maintenance Plan, Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Offshore Project and adhered to.	Operation and Maintenance	Secured in the Section 36 Consent and/or Marine Licence via the condition for an EMP to be submitted to MD-LOT for approval.	The O&M Plan will support the identification of any maintenance and repair needs which may be exacerbated by climate change and adverse weather conditions.

ID	Design and operational management measure proposed	Offshore Project phase measure introduced	How the environmental measures will be secured	Relevance to Climate Resilience assessment
M051	The Applicant will comply with the Construction Design and Management (CDM) regulations and complete design risk registers and undertake hazard identifications for all components of the Offshore Project.	Pre-Construction, Construction, O&M and Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence and CDM Regulations.	Adherence to the CDM regulations will limit weather-related impacts which may affect the construction programme, cause damage to plant and equipment, or create unsafe working conditions.
M052	A Service and Maintenance Agreement will be in place, key turbine metrics (vibration/ temperature load sensors etc.) will be monitored as part of the Supervisory Control and Data Acquisition (SCADA) system during and after extreme weather events to determine if any aspect of the structural integrity could be or has been compromised. In the event that the SCADA analysis indicates there is justification in doing so, visual and on-site inspections would be conducted by the O&M team and repairs carried out, as required. The Offshore Project will be subject to routine inspections. These include replacement of consumables, minor and major repairs as necessary. The Applicant expects to carry out routine benchmarking of the assets' health over the course of the Offshore Project lifetime.	Pre-Construction, Construction, O&M and Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	The Service and Maintenance Agreement, SCADA system and routine inspections will support the identification of any maintenance and repair needs which may be exacerbated by climate change and adverse weather conditions.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Climate Resilience.				

Table 25-3: Summary of commitments and mitigation measures for Climate – Greenhouse Gases

ID	Design and operational management measure proposed	Offshore Project phase measure introduced	How the environmental measures will be secured	Relevance to GHG assessment
Embedded measures				
M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).	Pre-Construction, construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	Minimising use of material and associated plant equipment use in the construction phase.
M005	Relevant best practice techniques for seabed excavations, employed through all phases of the Project, and suspended solids monitoring to aid responsible management of excavation activities.	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Minimising GHG emissions during the construction phase.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline Offshore EMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-Construction, construction	Offshore EMP secured via Marine Licence Condition.	Measures to be implemented to reduce GHG emissions during the construction phase and define measures to reduce embodied carbon in construction materials and encourage circular economy principles.
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan	Minimising GHG emissions during decommissioning activities.

ID	Design and operational management measure proposed	Offshore Project phase measure introduced	How the environmental measures will be secured	Relevance to GHG assessment
			to be submitted to MD-LOT for approval and the Energy Act 2004	
M022	A final Navigational Safety and Vessel Management Plan (NSVMP) will be developed prior to commencement of construction (building on the **Outline NSVMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an NSVMP to be submitted to MD-LOT for approval.	Appropriate management measures of vessel movements to minimise associated emissions.
M025	A final Operational & Maintenance (O&M) Plan (building on **Outline Operational & Maintenance Plan, Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Operation and Maintenance	Secured in the Section 36 Consent and/or Marine Licence via the condition for an EMP to be submitted to MD-LOT for approval.	Minimising GHG emissions during O&M activities.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Climate - Greenhouse Gas.				

Table 25.4: Summary of commitments and mitigation measures for Physical and Coastal Processes

ID	Environmental measure proposed	Project Phase Measure Introduced	How the environmental measures will be secured	Relevance to Physical and Coastal Processes Assessment
Embedded measures				
M001	The outputs of the project-specific site investigation surveys, will be reviewed to ensure that the final design and location of key project infrastructure takes full account of the physical environment and considers the potential for long-term changes. The mitigation hierarchy will be applied to avoid any sensitive areas identified, as far as is possible, by micrositing wind turbine generators (WTG) and cables.	Pre-Construction, construction	To be secured through a condition of the Section 36 consent and Marine Licence.	Pre-construction surveys will Inform the placement plan for the WTG and Offshore Cables to limit disturbance to the existing environment and associated physical processes, and any identified designated sites of geological interest.
M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).	Pre-Construction, Construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	The Cable Installation Plan will inform the routing locations, installation method, cable protection, and any required burial trench dimensions (depth) to ensure Offshore Cables are appropriately installed, to limit the degree of sediment disturbance.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on Outline Offshore EMP, Volume 3) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Construction	Secured in the Marine Licence via the condition for an EMP to be submitted to MD-LOT for approval.	The EMP will be used for the implementation of appropriate environmental management and control measures during the construction phase of the Offshore Project. The EMP will follow industry best practices to limit disturbance

ID	Environmental measure proposed	Project Phase Measure Introduced	How the environmental measures will be secured	Relevance to Physical and Coastal Processes Assessment
				(i.e. minimise sediment disturbance and seabed change) to the natural environment and offset potential impacts to physical and coastal processes, through compliance with s.36 and marine licence conditions.
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Secured in the Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004	The Decommissioning Plan will Inform the approach and programme for decommissioning the Offshore Project, with due consideration and definition of measures to limit disturbance to the residual natural environment and physical processes during and after removal of Offshore Project infrastructure
M025	A final Operational & Maintenance (O&M) Plan (building on Outline Operational & Maintenance Plan, Volume 3) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Operation and Maintenance.	To be secured through a condition of the Section 36 consent and Marine Licence.	Offshore maintenance and repair activities will align with legislative and best practice guidance detailed in the O&M Plan which will minimise and reduce disturbance to existing physical and coastal processes. Routine inspections of Array Cables will be detailed in the O&M Plan to ensure Array Cables are functioning as intended and disturbance to the seabed is minimised, routine inspections are vital to inform when

ID	Environmental measure proposed	Project Phase Measure Introduced	How the environmental measures will be secured	Relevance to Physical and Coastal Processes Assessment
				repair and maintenance of Array Cables is required.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Physical and Coastal Processes.				

Table 25.5: Summary of commitments and mitigation measures for Marine Sediment and Water Quality

ID	Environmental Measure Proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Marine Sediment and Water Quality assessment
Embedded measures				
M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).	Pre Construction, construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	Informs the routing, installation methods and burial trench dimensions used in the assessment of seabed disturbance, sediment mobilisation and associated effects on marine sediment quality and marine water quality receptors.
M004	Accidental release of construction material and/or litter to be addressed via the development of procedures to retrieve the accidental deposit of an object at sea.	Construction and Decommissioning.	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Limits accidental release of construction material and/or litter that could otherwise affect marine sediment quality or marine water quality receptors.
M005	Relevant best practice techniques for seabed excavations, employed through all phases of the Project, and suspended solids monitoring to aid responsible management of excavation activities.	Construction.	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Minimises increase of suspended sediment concentrations during seabed preparation and installation of infrastructure, thereby reducing potential effects on marine water quality and sediment quality receptors.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on Outline Offshore EMP, Volume 3) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-Construction and Construction.	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	Provides a framework for pollution prevention and control measures that minimises the risk of sediment disturbance and accidental release of contaminants, protecting marine water quality and sediment quality receptors.

ID	Environmental Measure Proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Marine Sediment and Water Quality assessment
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning.	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004.	Informs the decommissioning programme to limit seabed disturbance and associated effects on marine sediment quality and marine water quality receptors.
M021	Adherence to requirements of the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78/. Best practice techniques employed through all phases of the Project, and measures provided in a Marine Pollution Contingency Plan (MPCP) (see **MPCP**, **Volume 3**). All vessels associated with the Project will comply with IMO/MCA codes for prevention of oil pollution and, where appropriate, will have onboard Shipboard Oil Pollution Emergency Plans (SOPEPs) (i.e. vessels over 400 gross tonnes (GT)).	Construction and Decommissioning, Operation and Maintenance.	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the MPCP.	Minimises risk of accidental release of pollutants from vessels that could otherwise adversely affect marine water quality and sediment quality receptors.
M025	A final Operational & Maintenance (O&M) Plan (building on Outline Operational & Maintenance Plan, Volume 3) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Operational and Maintenance.	Secured in the Section 36 Consent and/or Marine Licence via the condition for an EMP to be submitted to MD-LOT for approval.	Outlines O&M activities and associated controls to minimise seabed disturbance and protect marine sediment quality and marine water quality receptors.
M030	Suitable implementation and monitoring of subsea cable burial, scour protection and cable protection in line with MGN 654 (via burial, or external protection where adequate burial depth as identified via risk assessment is not feasible). Surveys will be coordinated with the fishing industry, and results will be shared to inform ongoing coexistence.	Pre-Construction, Construction, Operation and Maintenance and Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduces seabed disturbance associated with cable installation, protection and maintenance, thereby limiting potential effects on marine sediment quality and marine water quality receptors.

ID	Environmental Measure Proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Marine Sediment and Water Quality assessment
M031	A Marine Pollution Contingency Plan (MPCP) will be developed prior to commencement of construction (building on **MPCP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-Construction, Construction, Operation and Maintenance and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an MPCP to be submitted to MD-LOT for approval.	Provides procedures to prevent and respond to accidental pollution events, protecting marine sediment quality and marine water quality receptors.
M054	To limit physical disturbance to the seabed, vessels will minimise the use of anchors, prioritising the use of dynamic positioning, where possible. This protocol will be of particular consideration around sensitive habitats.	Construction, Operation and Maintenance and Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	To minimise disturbance to the seabed that could result in impacts to marine sediment and water quality.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Marine Sediment and Water Quality.				

Table 25.6: Summary of commitments and mitigation measures for Benthic and Intertidal Ecology

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Benthic and Intertidal Ecology Assessment
Embedded measures				
M001	The outputs of the project-specific site investigation surveys, will be reviewed to ensure that the final design and location of key project infrastructure takes full account of the physical environment and considers the potential for long-term changes. The mitigation hierarchy will be applied to avoid any sensitive areas identified, as far as is possible, by micro siting wind turbine generators (WTG) and cables.	Pre-construction, construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduce impacts on sensitive benthic habitats (e.g., shellfish beds as well as habitat for spawning and feeding) through micro siting. For the purposes of the assessment, a potential reduction in impacts associated with avoiding sensitive habitats under this measure has not been assumed. The assessment applies a conservative worst-case scenario (i.e. assuming no avoidance is possible), as the extent to which sensitive areas can be avoided through micrositing cannot be quantified until detailed design and further site-specific investigations are completed.
M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where	Pre-construction, construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	Reduce impacts to benthic habitats and associated communities by maximising cable burial and minimising suspended sediments. It will also reduce the potential release of sequestered blue carbon and impacts from scour, permanent habitat loss and EMF.

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Benthic and Intertidal Ecology Assessment
	feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).			For the purposes of the assessment of impacts on benthic ecology from EMF, the potential reduction in exposure associated with increased cable burial depth under this measure has not been taken into account. A conservative worst-case scenario (i.e. assuming burial depth cannot be increased beyond the minimum achievable, as outlined under the maximum design scenario in **Chapter 11:, Volume 2a;** Table 11-14 is applied, as the extent to which burial depth can ultimately be optimised to reduce EMF exposure cannot be determined until detailed design and further site-specific investigations are undertaken.
M003	Mitigation measures associated with Underwater Noise will be defined in a Marine Mammal Mitigation Protocol (MMMP), which will be developed prior to commencement of construction (building on the **Outline MMMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence via the condition for an MMMP to be submitted to MD-LOT for approval.	This will reduce the potential impacts from underwater noise generation on benthic receptors such as shellfish
M004	Accidental release of construction material and/or litter to be addressed via the development of procedures to retrieve the accidental deposit of an object at sea.	Construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	This will reduce the potential impacts associated with unintended pollution, habitat disturbance / loss, and release of drilling fluids on benthic communities.
M005	Relevant best practice techniques for seabed excavations, employed through all phases of the Project, and	Construction	To be secured through a condition of the Section 36	This will reduce potential impacts from increased suspended solids and sediment

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Benthic and Intertidal Ecology Assessment
	suspended solids monitoring to aid responsible management of excavation activities.		consent and/or Marine Licence.	deposition, including disturbance to benthic habitats and the potential release of sequestered blue carbon.
M006	A Invasive Non-Native Species (INNS) Management Plan will be developed prior to commencement of construction (building on the **INNS Management Plan, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Construction, operation (including maintenance), and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the INNS Management Plan	This will reduce the potential spread of INNS and will reduce the magnitude of any potential introductions to benthic habitats
M018	The mitigation hierarchy will be applied throughout each stage of design development to avoid and reduce potential likely significant effects on Important Ecological Features (IEFs).	Pre-construction, construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	This will reduce impacts to benthic ecology through reducing the potential size of impacts and avoiding sensitive areas where practicable.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline OEMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, construction	To be secured through a condition of the Section 36 consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	This will reduce the potential impacts from habitat disturbance.
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004	Reduce impacts on benthic habitats and species through adhering to best practice standards and guidance during decommissioning activities.
M021	Adherence to requirements of the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78/. Best practice techniques employed	Construction, operation (including	Secured in the Section 36 Consent and/or Marine Licence conditions. Details	This will reduce any potential impacts from release of sediment bound contaminants (noting that such impacts have been

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Benthic and Intertidal Ecology Assessment
	through all phases of the Project, and measures provided in a Marine Pollution Contingency Plan (MPCP) (see **MPCP, Volume 3**). All vessels associated with the Project will comply with IMO/MCA codes for prevention of oil pollution and, where appropriate, will have onboard Shipboard Oil Pollution Emergency Plans (SOPEPs) (i.e. vessels over 400 gross tonnes (GT)).	maintenance), and decommissioning	will be provided within the MPCP	scoped out of the assessment due to the low levels of contamination bring recorded in sediment as part of the surveys).
M023	Offshore construction within the Offshore Project Boundary will only be undertaken during the April-October period, except for offshore Landfall construction works located within the HDD Exit Pit Area.	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduce impacts on benthic habitats and species by scheduling of construction reduce overall temporal disturbance.
M025	A final Operational & Maintenance (O&M) Plan (building on **Outline Operational & Maintenance Plan, Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Operation and Maintenance	Secured in the Section 36 Consent and/or Marine Licence via the condition for an EMP to be submitted to MD-LOT for approval.	Manage and reduce impacts associated with operation and maintenance activities.
M054	To limit physical disturbance to the seabed, vessels will minimise the use of anchors, prioritising the use of dynamic positioning, where possible. This protocol will be of particular consideration around sensitive habitats.	Construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	This will reduce the impacts for temporary and permanent habitat loss.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Benthic and Intertidal Ecology.				

Table 25.7: Summary of commitments and mitigation measures for Fish Ecology

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Fish Ecology assessment
Embedded mitigation				
M001	The outputs of the project-specific site investigation surveys, will be reviewed to ensure that the final design and location of key project infrastructure takes full account of the physical environment and considers the potential for long-term changes. The mitigation hierarchy will be applied to avoid any sensitive areas identified, as far as is possible, by micrositing wind turbine generators (WTG) and cables.	Pre-Construction, construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduce impacts on sensitive fish habitats (e.g., spawning grounds or key feeding habitats) through micrositing. For the purposes of the assessment, a potential reduction in impacts associated with avoiding sensitive habitats under this measure has not been assumed. The assessment applies a conservative worst-case scenario (i.e. assuming no avoidance is possible), as the extent to which sensitive areas can be avoided through micrositing cannot be quantified until detailed design and further site-specific investigations are completed.
M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments	Pre-construction, construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	Reduce impacts on fish to EMF by maximising opportunities for cable burial, while minimising generation of suspended solids and localised disturbance where natural options are available. For the purposes of the assessment of impacts on fish from EMF, the potential reduction in exposure associated with increased cable burial depth under this measure has not been taken into account. A conservative worst-case scenario (i.e. assuming burial depth cannot be increased

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Fish Ecology assessment
	identified (to maximise opportunities for cable burial).			beyond the minimum achievable, as outlined under the maximum design scenario in **Chapter 12, Volume 2a**) is applied, as the extent to which burial depth can ultimately be optimised to reduce EMF exposure cannot be determined until detailed design and further site-specific investigations are undertaken.
M003	A final Marine Mammal Mitigation Protocol (MMMP) will be developed prior to commencement of construction (building on the **Outline MMMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Construction, Operation and Maintenance and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an MMMP to be submitted to MD-LOT for approval.	Reduce noise impacts on fish through implementation of use of soft start and ramp-up procedures.
M004	Accidental release of construction material and/or litter to be addressed via the development of procedures to retrieve the accidental deposit of an object at sea.	Construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduces the risk of pollution-related impacts on fish by ensuring that any accidentally deposited construction materials or litter are retrieved from the marine environment.
M005	Relevant best practice techniques for seabed excavations, employed through all phases of the Project, and suspended solids monitoring to aid responsible management of excavation activities.	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduces potential impacts on fish by minimising suspended solids and protecting water quality through best-practice.
M006	A Invasive Non-Native Species (INNS) Management Plan will be developed prior to commencement of construction (building on the INNS Management Plan, Volume 3) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Construction, Operation and Maintenance and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the INNS Management Plan	Reduces the impact on fish and fish habitats by minimising the introduction and spread of invasive species.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of	Pre-Construction and Construction	Secured in the Section 36 Consent and/or Marine	Reduces the risk of pollution-related impacts on fish through the implementation of best-practice

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Fish Ecology assessment
	construction (building on **Outline Offshore EMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.		Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	measures for waste management, and the storage, handling and use of oils, fuels and chemicals, supported by appropriate environmental monitoring.
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004	Reduce impacts on fish through adhering to best practice standards and guidance during decommissioning activities.
M021	Adherence to requirements of the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78. Best practice techniques employed through all phases of the Project, and measures provided in a Marine Pollution Contingency Plan (MPCP) (see **MPCP, Volume 3**). All vessels associated with the Project will comply with IMO/MCA codes for prevention of oil pollution and, where appropriate, will have onboard Shipboard Oil Pollution Emergency Plans (SOPEPs) (i.e. vessels over 400 gross tonnes (GT))[2].	Construction, Operation and Maintenance and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the MPCP	Reduces pollution risks to fish by applying best practice vessel operations and contingency measures to prevent and manage accidental releases.
M023	Offshore construction within the Offshore Project Boundary will only be undertaken during the April-October period, except for offshore Landfall	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduce impacts on fish by scheduling of construction activities to avoid sensitive periods for some fish species (e.g., sandeel) and reduces

[2] MARPOL is enacted in the UK through the Merchant Shipping Act 1995 and a series of related regulations to cover the various Annexes of the convention.

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Fish Ecology assessment
	construction works located within the HDD Exit Pit Area.			overall temporal disturbance by limiting activity to a defined portion of the year.
M031	A Marine Pollution Contingency Plan (MPCP) will be developed prior to commencement of construction (building on **MPCP**, **Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-Construction, Construction, Operation and Maintenance and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an MPCP to be submitted to MD-LOT for approval.	Reduces pollution risks to fish by applying best practice vessel operations and contingency measures to prevent and manage accidental releases.
M033	A Lighting and Marking Plan (LMP) will be developed prior to commencement of construction (building on the **Outline LMP, Volume 3**) in compliance with legislative requirements and best practice standards and guidance and adhered to.	Pre-Construction, Construction, Operation and Maintenance and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a LMP to be submitted to MD-LOT for approval.	Reduces risk of predator aggregation and minimises behavioural disruption to migratory fish caused by artificial lighting and infrastructure barriers
M038	Adherence to best practice guidance with regards to damage or loss of fishing gear that is attributable to the Offshore Project.	Pre-Construction, Construction, Operation and Maintenance and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.	Reduces the risk of entanglement or ghost-fishing impacts on fish by supporting timely management and retrieval of fishing gear lost or damaged as a result of the Project, in accordance with recognised best-practice guidance.
Secondary mitigation				
A006	The Underwater Noise Piling Strategy will be developed to incorporate the percussive piling installation sequencing and periods of continuous quiet time as outlined in **Appendix 12.3: Overview of Percussive Piling Fish Ecology Mitigation**, **Volume 2c**.	Construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an Piling Strategy to be submitted to MD-LOT for approval.	See **Chapter 12, Volume 2a**.

Table 25.8: Summary of commitments and mitigation measures for Marine Mammals

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Marine Mammals assessment
Embedded measures				
M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).	Pre-construction, construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	Cable laying activities are anticipated to generate underwater noise, which has the potential to cause auditory injury or behavioural disturbance to marine mammals. In addition, these activities may increase levels of suspended sediment in the water column, potentially affecting water quality and benthic habitats and species (the latter of which could produce indirect effects on marine mammals). The cable laying plan will determine the methods to be used in order to minimise effects on ecological receptors.
M003	A MMMP will be developed prior to commencement of construction (building on the **Outline MMMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, construction, operation (including maintenance), and decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an MMMP to be submitted to MD-LOT for approval.	Outlines best practice measures to avoid causing auditory injury to marine mammals from piling activity. This includes an MMO on board during noise generating activities to carry out visual monitoring and provide mitigation advice to vessel crews, and the hiring of a PAM operator to acoustically detect marine mammals within the mitigation zone and provide advice to vessel crews. The Outline and Final MMMP will also suggest a mitigation zone for monitoring during piling,

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Marine Mammals assessment
				and use of noise abatement systems, soft start and ramp-up procedures.
M004	Accidental release of construction material and/or litter to be addressed via the development of procedures to retrieve the accidental deposit of an object at sea.	Pre-construction, construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Outlines best practice to avoid adverse effects on marine mammals from accidental pollution.
M005	Relevant best practice techniques for seabed excavations, employed through all phases of the Project, and suspended solids monitoring to aid responsible management of excavation activities.	Construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Outlines best practice to avoid adverse effects on marine mammals from increased suspended solids and reduction in water quality.
M015	Compliance of all Offshore Project vessels with international marine regulations as adopted by the Flag State, notably the International Regulations for Preventing Collisions at Sea (COLREGs) (IMO, 1972/77) and the International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974).	Pre-construction, construction, and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Outlines vessel management procedures that will reduce the risk of collision with marine mammals.
M019	A final OEMP will be developed prior to commencement of construction (building on **Outline OEMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	Project to develop an OEMP to define the mitigation measures and procedures relevant to environmental management during the construction phase. This also includes the creation of a Marine Pollution Contingency Plan (MPCP) to minimise potential impacts to marine mammals.

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Marine Mammals assessment
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004	Details methods used during this phase to remove offshore infrastructure, considering potential effects on marine mammal receptors.
M021	Adherence to requirements of the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78. Best practice techniques employed through all phases of the Project, and measures provided in a MPCP (see **MPCP, Volume 3**). All vessels associated with the Project will comply with International Maritime Organisation (IMO)/ Maritime and Coastguard Agency (MCA) codes for prevention of oil pollution and, where appropriate, will have onboard Shipboard Oil Pollution Emergency Plans (SOPEPs) (i.e. vessels over 400 gross tonnes (GT)).	Pre-construction, construction, operation (including maintenance), and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the MPCP	Outlines best practice to avoid adverse effects on marine mammals from accidental pollution.
M025	A Final Operational & Maintenance Plan (OMP) (building on **Outline OMP**, **Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Operation and Maintenance	Secured in the Section 36 Consent and/or Marine Licence via the condition for an EMP to be submitted to MD-LOT for approval.	The Final OMP will outline the mitigation measures and procedures relevant to environmental management during the O&M phase. This will also include mitigation measures and procedures to minimise potential impacts to marine mammals.

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Marine Mammals assessment
M029	A Marine Coordination Centre will be established to monitor all vessel activity (Project, fishing and other maritime vessels), issue Notices to Mariners, and serve as a contact point for all maritime stakeholders.	Pre-construction, construction, and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Outlines vessel management procedures that will reduce the risk of collision with marine mammals.
M031	A Marine Pollution Contingency Plan (MPCP) will be developed prior to commencement of construction (building on **MPCP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Design, pre-construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an MPCP to be submitted to MD-LOT for approval.	Provides a detailed risk assessment response plan for marine pollution events such as oil spills and methods for reducing impacts on marine animals, including marine mammals. This also includes the hiring of a spill response contractor to provide spill equipment, trained personnel and technical expertise, provides a tiered approach to effectively manage environmental spills and minimise harm to the environment.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Marine Mammals.				

Table 25.9: Summary of commitments and mitigation measures for Marine and Near Shore Ornithology

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Marine and Nearshore Ornithology Assessment
M001	The outputs of the project-specific site investigation surveys, will be reviewed to ensure that the final design and location of key project infrastructure takes full account of the physical environment and considers the potential for long-term changes. The mitigation hierarchy will be applied to avoid any sensitive areas identified, as far as is possible, by micrositing wind turbine generators (WTG) and cables.	Pre-construction, construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	The review of site-specific investigation data allows the project design and layout to avoid sensitive marine and coastal bird habitats wherever possible.
M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).	Construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	The use of ploughing techniques or surface laying reduces the amount of suspended sediment generated compared to jet trenching. Suspended sediment can directly impact ornithological receptors and can also lead to indirect effects via impacts on prey.
M004	Accidental release of construction material and/or litter to be addressed via the development of procedures to retrieve the accidental deposit of an object at sea.	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Materials and litter can directly impact ornithological receptors and can also lead to indirect effects via impacts on prey.
M005	Relevant best practice techniques for seabed excavations, employed through all phases of the Offshore Project, and suspended solids monitoring to aid responsible management of excavation activities.	Construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Suspended sediment can directly impact ornithological receptors and can also lead to indirect effects via impacts on prey.
M006	A Invasive Non-Native Species (INNS) Management Plan will be developed prior to commencement of construction	Construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine	Indirect effects through effects on prey

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Marine and Nearshore Ornithology Assessment
	(building on the **INNS Management Plan, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.		Licence conditions. Details will be provided within the INNS Management Plan	
M010	Compliance with MGN 654 and its annexes including development and implementation of a Search and Rescue (SAR) Checklist, Emergency Response Cooperation Plan (ERCOP) and guard vessels as required by risk assessment.	Construction, O&M, and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the ERCOP.	Can result in temporary habitat loss and disturbance and displacement
M014	Marking and lighting of the Array Area in agreement with Northern Lighthouse Board (NLB) and as per the requirements of International Association of Lighthouse Authorities (IALA) Recommendation O-139 (IALA, 2021a) and Guidance G1162 (IALA, 2021b). This will include a buoyed construction area.	Pre-construction, Construction, O&M, and Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Helps maintain safe navigation and clearly sets out the construction footprint, including through the use of a buoyed construction area. By keeping vessel movements predictable and routing them around marked infrastructure, the measure reduces the risk of accidental incursions and avoids unnecessary disturbance, helping to minimise displacement of marine and nearshore ornithological receptors.
M016	Wind turbines blade clearance of at least 28.33 m above Mean High Water Springs (MHWS) (30 m above Mean Sea Level (MSL)).	Design, pre-construction, construction	To be secured through a condition of the Section 36 consent and Marine Licence.	The distance between the water level and lowest point of the wind turbine blade is known to be an important factor for collision risk, with typically fewer collisions predicted with increasing air draught.
M018	The mitigation hierarchy will be applied throughout each stage of design development to avoid and reduce potential	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36	Applying the mitigation hierarchy throughout design development ensures that potential effects on

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Marine and Nearshore Ornithology Assessment
	likely significant effects on Important Ecological Features (IEFs).		consent and/or Marine Licence.	Important Ecological Features (IEFs), including sensitive seabird populations are avoided or minimised as early as possible.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline Offshore Environmental Management Plan, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-Construction and Construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	Developing an OEMP prior to construction ensures that all mitigation, monitoring, and environmental protection measures are aligned with current legislation and best-practice guidance.
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-Construction and Construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004	Ensures that end-of-life activities are fully considered from the outset, in line with legislative requirements and best-practice guidance. This minimises potential impacts on marine and nearshore ornithological receptors.
M021	Adherence to requirements of the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78/. Best practice techniques employed through all phases of the Project, and measures provided in a Marine Pollution Contingency Plan (MPCP) (see **Marine Pollution Contingency Plan, Volume 3**). All vessels associated with the Project will comply with IMO/MCA codes for prevention of oil pollution and, where appropriate, will have onboard Shipboard Oil Pollution Emergency Plans (SOPEPs) (i.e. vessels over 400 gross tonnes (GT))."	Construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the MPCP	Indirect effects through effects on prey

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Marine and Nearshore Ornithology Assessment
M022	A final Navigational Safety and Vessel Management Plan (NSVMP) will be developed prior to commencement of construction (building on the **Outline Navigational Safety and Vessel Management Plan, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Construction, O&M and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an NSVMP to be submitted to MD-LOT for approval.	Ensures that vessel movements are carefully controlled and managed in line with legislative requirements and best-practice guidance. Effective vessel management reduces the risk of disturbance, collision, and displacement of sensitive marine and nearshore ornithological receptors, helping minimise potential impacts during construction, O&M and decommissioning activities.
M023	Offshore construction within the Offshore Project Boundary will only be undertaken during the April–October period, except for offshore Landfall construction works located within the HDD Exit Pit Area.	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Ensures that disturbance does not occur during key marine ornithological receptor non-breeding seasons
M025	A final Operation and Maintenance (O&M) Plan (building on **Outline Operation and Maintenance Plan, Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Operation and Maintenance	Secured in the Section 36 Consent and/or Marine Licence via the condition for an EMP to be submitted to MD-LOT for approval.	Ensures that all routine activities, vessel movements, and maintenance procedures are managed in accordance with current legislation and best-practice guidance. This minimises potential disturbance, collision risk, and displacement of marine and nearshore ornithological receptors throughout the operational life of the project.
M031	A MPCP will be developed prior to commencement of construction (building on **MPCP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Design, pre-construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for	Pollution can directly impact ornithological receptors and can also lead to indirect effects via impacts on prey.

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Marine and Nearshore Ornithology Assessment
			an MPCP to be submitted to MD-LOT for approval.	
M033	A Lighting and Marking Plan (LMP) will be developed prior to commencement of construction (building on the **Outline LMP, Volume 3**) in compliance with legislative requirements and best practice standards and guidance and adhered to.	Construction, O&M, and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a LMP to be submitted to MD-LOT for approval.	The impact 'response to artificial lighting' is directly related to how the Offshore Project is lit. A legally required minimum is presumed.
M036	The Project will only install Wind Turbine Generators and Offshore Substation Platform (if required) above sea infrastructure within the Turbine Area.	Pre-construction and Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Limiting installation to Wind Turbine Generators and, if required, an OSP only within the defined Turbine Area ensures that construction activities remain spatially contained. This minimises the potential for additional disturbance or habitat displacement for marine and nearshore ornithological receptors outside the assessed footprint.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Marine and Nearshore Ornithology.				

Table 25.10: Summary of commitments and mitigation measures for Offshore Archaeology and Cultural Heritage

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Offshore Archaeology and Cultural Heritage Assessment
Embedded measures				
M001	The outputs of the project-specific site investigation surveys will be reviewed to ensure that the final design and location of key project infrastructure takes full account of the physical environment and considers the potential for long-term changes. The mitigation hierarchy will be applied to avoid any sensitive areas identified, as far as is possible, by micrositing wind turbine generators (WTG) and cables.	Pre-Construction, Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	This measure will ensure appropriate archaeological investigation methodologies are in place to minimise the risk to offshore archaeological receptors and ensure that an appropriate and informed mitigation strategy is developed and implemented.
M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).	Pre-Construction, Construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	The Cable Installation Plan will Inform the routing locations, installation method, cable protection, and any required burial trench dimensions (depth) to ensure Offshore Cables are appropriately installed, to minimise the risk to offshore archaeological receptors.
M007	A Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) will be developed prior to commencement of construction (building on **Written Scheme of Investigation and Protocol for Archaeological Discoveries, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, construction	Section 36 consent and/or marine licence via the condition for a WSI submitted to MD-LOT for approval.	This measure will ensure appropriate archaeological investigation methodologies are in place to minimise the risk to offshore archaeological receptors and ensure that an appropriate and informed mitigation strategy is developed and implemented.

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Offshore Archaeology and Cultural Heritage Assessment
M008	Archaeological Exclusion Zones (AEZs), Temporary Exclusion Zones (TEZs) or Areas of Archaeological Interest (AAI) and micrositing will be developed prior to the construction of the Offshore Project in accordance with legislative requirement and/or best practice guidance, to avoid sites of known archaeological significance.	Pre-construction, construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	High and medium potential archaeological receptors have been and will continue to be avoided in all phases of the Offshore Project by use of AEZs, TEZs, AAIs and micro-siting. A total of 2 x 50 m and 3 x 25 m AEZs have been proposed in Chapter 12, Volume 2a. AEZs will be included within the following plans: CEMP; Cable Plan (CaP), Design Specification and Layout Plan (DSLP), and Decommissioning Plan (DP).
M009	Geophysical and geotechnical surveys will be conducted prior the construction of the Offshore Project, to identify unknown sites of archaeological interest, undertaken in consultation with the project archaeologists, to inform AEZs and micrositing requirements.	Pre-construction, construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	This measure will help manage risks and interactions depending on what is found. It will also enhance our knowledge of known archaeological remains.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline Offshore EMP**, **Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	This measure will ensure appropriate archaeological investigation methodologies are in place to minimise the risk to offshore archaeological receptors and ensure that an appropriate and informed mitigation strategy is developed and implemented.
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to	This measure will ensure appropriate archaeological investigation methodologies are in place to minimise the risk to offshore archaeological

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Offshore Archaeology and Cultural Heritage Assessment
			be submitted to MD-LOT for approval and the Energy Act 2004	receptors and ensure that an appropriate and informed mitigation strategy is developed and implemented.
M025	A final Operational & Maintenance (O&M) Plan (building on **Outline Operational & Maintenance Plan**, **Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Operation and Maintenance	Section 36 Consent and/or Marine Licence via the condition for an EMP to be submitted to MD-LOT for approval	This measure will ensure appropriate archaeological investigation methodologies are in place to minimise the risk to offshore archaeological receptors and ensure that an appropriate and informed mitigation strategy is developed and implemented.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Offshore Archaeology and Cultural Heritage.				

Table 25.11: Summary of commitments and mitigation measures for Shipping and Navigation

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Shipping and Navigation Assessment
M002	A Cable Installation Plan will be produced to confirm routeing, method of installation and aspects such as target depth of burial and need for/location of/type of external cable protection. This plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).	Pre-construction, Construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	Ensures risk associated with presence of subsea cables (including anchor interaction, fishing gear snagging and reduced under keel clearance) is minimised.
M010	Compliance with MGN 654 and its annexes including development and implementation of a SAR Checklist, ERCoP and guard vessels as required by risk assessment.	Pre-construction, Construction, O&M, Decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the ERCOP.	MGN 654 sets out considerations when assessing the impact on navigational safety and emergency response caused by OREIs.
M011	The Offshore Project infrastructure inclusive of surface piercing structures and subsea cables will be appropriately marked on Admiralty and aeronautical charts, and information on structure positions and heights will be provided to the UKHO.	Pre-construction, Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Appropriate marking on relevant nautical charts aids mariners when navigating in proximity to the Offshore Project.
M012	Timely and efficient distribution of Notices to Mariners (NtMs), Kingfisher notifications, and other navigational warnings of the position and nature of works associated with the Offshore Project, including information for vessel routes, timings and locations, safety zones (around surface piercing infrastructure) and advisory passing distances. Physical notices will be placed at marinas and harbours in the vicinity of the Offshore Project and final locations of installed infrastructure will be charted and distributed to recreational clubs.	Pre-construction, construction, and decommissioning	Secured in the Section 36 consent and/or Marine Licence via the requirement for notifications and promulgation of information and will be set out within the NSVMP.	Promulgation of information including Notices to Mariners and Kingfisher Bulletins gives advance warning to mariners which allows appropriate passage planning. Approach will be detailed in Navigational Safety and Vessel Management Plan (NSVMP).

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Shipping and Navigation Assessment
M013	Surface piercing structures - application for safety zones of up to 500 m pre-commissioning.	Pre-construction, Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Safety zones will help protect Offshore Project vessels undertaking construction and major maintenance activity and help ensure third-party vessels awareness of activity is maximised. Approach will be detailed in NSVMP.
M014	Marking and lighting of the Array Area in agreement with NLB and as per the requirements of IALA Recommendation O-139 (IALA, 2021a) and Guidance G1162 (IALA, 2021b). This will include a buoyed construction area.	Pre-construction, Construction, O&M	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Lighting and marking of structures provides AtoNs to mariners operating in the vicinity of the Array Area. Approach will be detailed in Lighting and Marking Plan (LMP).
M015	Compliance of all Offshore Project vessels with international marine regulations as adopted by the Flag State, notably the International Regulations for Preventing Collisions at Sea (COLREGs) (IMO, 1972/1977) and the International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974).	Pre-construction, Construction, O&M, Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Compliance with international marine regulations aids collision avoidance and maximises safety at sea.
M016	Wind turbines blade clearance of at least 28.33 m above Mean High Water Springs (MHWS) (30 m above Mean Sea Level (MSL)).	Design, Pre-construction, O&M	To be secured through a condition of the Section 36 consent and/or Marine Licence.	There will be a minimum blade tip clearance of at least 28.33 m above MHWS to minimise allision risk.
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004	Reduce risk of adverse Shipping and Navigation effects on receptors.

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Shipping and Navigation Assessment
M022	A Final NSVMP will be developed prior to commencement of construction (building on the **Outline NSVMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, Construction, O&M, Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an NSVMP to be submitted to MD-LOT for approval.	Ensures active and safe management of navigational activities to minimise risk of adverse Shipping and Navigation effects on receptors.
M024	Dedicated risk assessment post consent if a location within Loch Roag/*Loch Ròg* is planned to be used as a base port taking account of vessel traffic in Loch Roag/*Loch Ròg*, full details of planned Offshore Project vessels, their movements, and bases within Loch Roag/*Loch Ròg*, plus any impact on use of existing AtoNs within Loch Roag/*Loch Ròg*.	Pre-construction, Construction, O&M, Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Is required by the NLB as per consultation input during the Hazard Workshop. Ensures disruption to third-party vessel movements and activities in Loch Roag/*Loch Ròg* are minimised and details of requirements will be determined in consultation with NLB post consent if Loch Roag/*Loch Ròg* is used as a base port.
M026	A Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) (building on **FMMCP, Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Pre-construction, Construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.	Reduce risk of adverse Shipping and Navigation effects on fishing vessels and maximise awareness of the Offshore Project.
M029	A Marine Coordination Centre will be established to monitor all vessel activity (Project, fishing and other maritime vessels), issue Notices to Mariners, and serve as a contact point for all maritime stakeholders.	Pre-construction, Construction, Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Coordination and communication of Offshore Project vessel movements minimises disruption to third-party receptors. Approach will be detailed in NSVMP. The NSVMP will detail navigational safety measures and details relating to the coordination

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Shipping and Navigation Assessment
				of Offshore Project vessels including indicative transit routes.
M030	Suitable implementation and monitoring of subsea cable burial, scour protection and cable protection in line with MGN 654 (via burial, or external protection where adequate burial depth as identified via risk assessment is not feasible). Surveys will be coordinated with the fishing industry, and results will be shared to support collaborative engagement and minimise conflict.	Pre-construction, Construction, Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Cable protection reduces under keel clearance and protects against vessel interaction. The Cable Plan (CaP) will confirm planning cable routing, burial, and any additional protection and will set out methods for post-installation cable monitoring.
M031	A Marine Pollution Contingency Plan (MPCP) will be developed prior to commencement of construction (building on **MPCP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, Construction, O&M	Secured in the Section 36 Consent and/or Marine Licence via the condition for an MPCP to be submitted to MD-LOT for approval.	An MPCP will include emergency plans and mitigation for a range of potential marine pollution incidents and outline procedures to protect personnel working and to safeguard the marine environment.
M033	A LMP will be developed prior to commencement of construction (building on the **Outline LMP, Volume 3**) in compliance with legislative requirements and best practice standards and guidance and adhered to.	Pre-construction, Construction, O&M, Decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a LMP to be submitted to MD-LOT for approval.	Lighting and marking of structures provides AtoNs to mariners operating in the vicinity of the Array Area.
M039	Lighting and marking failures will be appropriately reported and rectified as soon as possible. Interim hazard warnings will be put in place.	Construction, O&M, and Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Lighting and marking of structures provides AtoNs to mariners operating in the vicinity of the Array Area.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Shipping and Navigation.				

Table 25.12: Summary of commitments and mitigation measures for Military and Civil Aviation

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Military and Civil Aviation assessment
Embedded mitigation				
M010	Compliance with MGN 654 and its annexes including development and implementation of a SAR Checklist, ERCOP and guard vessels as required by risk assessment.	Pre-Construction, construction, operation (including maintenance), and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the ERCOP.	The Offshore Project will create an obstacle environment that may impact SAR helicopter flight operations should SAR be required within or close to the Offshore Project. The preparation of an ERCOP in cooperation with the MCA will mitigate the impact.
M017	Information regarding construction to be provided to the CAA in accordance with ANO Article 225A at least 8 weeks in advance of the erection or removal of the en route obstacle (whether an anemometer mast, turbine or installation crane/vessel, etc). Data to include location, height (of all structures over 100 m), date of erection, date of removal and lighting type; changes to the planned works must also be notified to the CAA in accordance with ANO Article 225A. The CAA co-ordinates dispersion of the information to NATS and the MOD for inclusion as required in the UK AIP and the UK Military AIP.	Construction, Operation and Maintenance	To be secured through a condition of the Section 36 consent and Marine Licence.	The Offshore Project will create an aviation obstacle environment that can be mitigated by warning the aviation sector through the issue of NOTAMs and AICs. Permanent information on the Offshore Project will be provided to the CAA under ANO Article 225A for inclusion by NATS in the UK AIP and Defence Geographic Centre for inclusion in the Military AIP, and on relevant civil and military aeronautical charts.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline Offshore Environmental Management Plan, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Operation and Maintenance	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	An OEMP will be developed with compliance to relevant aviation related legislation and standards.

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Military and Civil Aviation assessment
M033	A LMP will be developed prior to commencement of construction (building on the **Outline Lighting and Marking Plan, Volume 3**) in compliance with legislative requirements and best practice standards and guidance and adhered to.	Pre-Construction, Construction, Operation and Maintenance and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a LMP to be submitted to MD-LOT for approval.	To mitigate the impact of WTGs as aviation obstacles and make them more visible to pilots, WTGs must be suitably marked and lit. Requirements for the lighting of offshore WTGs are detailed in Article 222 and 223 of the ANO and supplemented by additional MOD guidance and MGN 654 Annex 5 requirements.
M039	Lighting and marking failures will be appropriately reported and rectified as soon as possible. Interim hazard warnings will be put in place.	Construction, Operation and Maintenance and Decommissioning	To be secured through a condition of the Section 36 consent and Marine Licence.	Ensures that all aviation stakeholders are aware of the lighting or marking failure, and that the issue is resolved
M055	Development of, and adherence to a Development Specification and Layout Plan (DSLP) which will be shared with Military and Civil Aviation stakeholders.	Pre-Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Ensures that all aviation stakeholders are aware of the potential aviation obstacle environment
Additional mitigation				
A008	Before Project construction commences, final details of WTG locations and blade tip heights will be confirmed with HIAL to enable suitable revisions to the relevant IFPs as outlined in **Appendix 17.2: Instrument Flight Procedures, Volume 2c**.	Pre-construction	Secured in the Section 36 Consent and/or Marine Licence via a consent condition.	See **Chapter 17, Volume 2a**.
A009	Before Project construction commences, final details of WTG locations and blade tip heights will be shared with the MOD to confirm that the potential impact to RRH Benbecula/*Beinn nam Fadhla* is deemed acceptable.	Pre-construction	Secured in the Section 36 Consent and/or Marine Licence via a consent condition.	See **Chapter 17, Volume 2a**.

Table 25.13: Summary of commitments and mitigation measures for Seascape, Landscape and Visual Impact Assessment

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to SLVIA
Embedded mitigation				
M014	Marking and lighting of the Array Area in agreement with NLB and as per the requirements of IALA Recommendation O-139 (IALA, 2021a) and Guidance G1162 (IALA, 2021b). This will include a buoyed construction area.	Pre-Construction, construction, operation (including maintenance), and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	This commitment provides for marking and lighting of the Array Area as per the requirements of the relevant authorities.
M033	A LMP will be developed prior to commencement of construction (building on the **Outline LMP, Volume 3**) in compliance with legislative requirements and best practice standards and guidance and adhered to.	Pre-Construction, Construction, Operation and Maintenance and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a LMP to be submitted to MD-LOT for approval.	This commitment provides for minimising the visual impact of lighting as far as practicable, whilst ensuring compliance with requirements for lighting and marking the Offshore Project. The LMP includes specification for the aviation lights to operate at 200 cd when visibility is at least 5 km in all directions, which will reduce the visual impact of the aviation lighting.
M036	The Project will only install WTGs and Offshore Substation Platform (if required) above sea infrastructure within the Turbine Area.	Pre-Construction and Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	This commitment provides for an increased separation distance between the WTGs and the Isle of Lewis/*Eilean Leòdhais* coast, NSA and WLA, minimising impacts on these receptors; and a reduction in the footprint of the WTGs, avoiding above sea infrastructure in the southwest portion of the Array Area closest to NSA. Commitment reduces risks of adverse effects on NSA.
M040	Due regard will be given to landscape and visual design principles in the Design Specification Layout Plan post consent, with consideration of the seascape, landscape and visual impacts of the	Pre-Construction and Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	This provides for minimising seascape, landscape and visual impacts as far as practicable through a commitment to have regard to landscape and visual design principles in the Design Specification Layout

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to SLVIA
	Offshore Project on the NSA. The DSLP will be shared with and approved by MD-LOT prior to construction commencing.			Plan post consent. Commitment reduces risk of adverse seascape, landscape and visual effects.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on SLVIA.				

Table 25.14: Summary of commitments and mitigation measures for Offshore Airborne Noise

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Offshore Airborne Noise assessment
Embedded mitigation				
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline Offshore EMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-Construction and Construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the OEMP.	Mitigate and minimise noise from offshore construction activities.
Additional mitigation				
A007	The Airborne Noise Piling Strategy will be developed to incorporate further measures, such as those identified in **Chapter 19: Offshore Airborne Noise, Volume 2c**, to mitigate the potential impacts of the percussive piling activity to an acceptable level.	Construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an Airborne Noise Piling Strategy to be submitted to MD-LOT for approval.	See **Chapter 19, Volume 2a**.

Table 25.15: Summary of commitments and mitigation measures for Other Sea Users and Recreation

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Other Sea Users and Recreation Assessment
Embedded mitigation				
M011	The Offshore Project inclusive of surface piercing structures and subsea cables will be appropriately charted on Admiralty and aeronautical charts, and information on structure positions and heights will be provided to the UK Hydrographic Office (UKHO).	Pre-Construction, construction, O&M, and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Ensure all other sea users, fishermen and vessels are aware of all Project infrastructure
M012	Timely and efficient distribution of Notices to Mariners (NtMs), Kingfisher notifications, and other navigational warnings of the position and nature of works associated with the Offshore Project, inc information for vessel routes, timings and locations, safety zones (around surface piercing infrastructure) and advisory passing distances. Physical notices will be places at marinas and harbours in the vicinity of the Offshore Project and final locations of installed infrastructure will be charted and distributed to recreational clubs.	Pre-Construction, construction, O&M, and decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the requirement for notifications and promulgation of information and will be set out within the NSVMP.	Ensure all other sea users are notified of works relating to the Project and information is made available for local recreational clubs in public spaces
M013	Surface piercing structures - application for safety zones of up to 500 m during construction and periods of major maintenance, and up to 50 m pre-commissioning.	Pre-Construction, construction, O&M, and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduce risk to navigational safety
M014	Marking and lighting of the Array Area in agreement with Northern Lighthouse Board (NLB) and as per the requirements of International Association of Lighthouse Authorities (IALA) Recommendation O-139 (IALA, 2021a) and Guidance G1162 (IALA, 2021b). This will include a buoyed construction area.	Pre-Construction, construction, O&M, and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduce risk to navigational safety
M015	Compliance of all Offshore Project vessels with international marine regulations as adopted by the Flag State, notably the International Regulations for Preventing Collisions at Sea (COLREGs) (IMO, 1972/1977)	Pre-construction, construction, O&M, and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduce risk to navigational safety

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Other Sea Users and Recreation Assessment
	and the International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974).			
M016	Wind turbines blade clearance of at least 28.33 m above Mean High Water Springs (MHWS) (30 m above Mean Sea Level (MSL)).	Design, pre-construction, construction, O&M	To be secured through a condition of the Section 36 consent and/or Marine Licence.	To ensure sufficient clearance for recreational and other sea user vessels to pass safely.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline Offshore EMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction and construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	Reduce risk of adverse environmental effects on Other Sea Users and Recreation
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004	Reduce risk of adverse effects to Other Sea Users and Recreation
M025	A final O&M Plan (building on **Outline Operational & Maintenance Plan, Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Operation and Maintenance	Secured in the Section 36 Consent and/or Marine Licence via the condition for an EMP to be submitted to MD-LOT for approval.	Reduce risk of adverse environmental effects on Other Sea Users and Recreation
M028	As outlined in the **FMMCP, Volume 3**, a Company Fisheries Liaison Officer (CFLO), Fishing Industry Representative (FIR), and Offshore Fisheries Liaison Officer(s) (OFLOs) will be appointed prior to commencement of development to liaise with local, regional and national fishing organisations, as well as individual fishers on offshore activities undertaken in relation the Offshore Project.	Pre-Construction, Construction, O&M and Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.	Ensure all local fishermen, fisheries associations and organisations are consulted and notified of works relating to the Project

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Other Sea Users and Recreation Assessment
M032	A Design Specification Layout Plan (DSLP) will be developed and shared with commercial fisheries stakeholders through the Commercial Fisheries Working Group.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a DSLP to be submitted to MD-LOT for approval.	Reduce risk of adverse effects to Commercial Fisheries and Other Sea Users and Recreation and promote coexistence.
M033	A Lighting and Marking Plan (LMP) will be developed prior to commencement of construction (building on the **Outline LMP, Volume 3**) in compliance with legislative requirements and best practice standards and guidance and adhered to.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a LMP to be submitted to MD-LOT for approval.	This commitment provides for minimising lighting impacts as far as practicable, whilst ensuring compliance with requirements for lighting and marking the Offshore Project.
M036	The Project will only install Wind Turbine Generators and Offshore Substation Platform (if required) above sea infrastructure within the Turbine Area.	Pre-construction, construction and O&M	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Increases the separation distance of the Array Area from the Isle of Lewis/*Eilean Leòdhais* coast and NSA, minimising impacts on these receptors. Reduction in footprint of the turbine area, avoiding WTGs in the southwest portion of the Array Area closest to NSA. The increased separation distance of the Array Area from the Isle of Lewis/*Eilean Leòdhais* coast also increases open water for vessel transits for tourism and recreation.

ID	Environmental Measure Proposed	Project Phase Measure Introduced	How the Environmental Measures will be Secured	Relevance to Other Sea Users and Recreation Assessment
M037	Use of local tour operator vessels or fishing vessels that meet relevant safety requirements, where possible to assist future Project activities, such as guard vessel opportunities.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions, and to be detailed within the FMMCP.	To provide beneficial opportunities to local vessels where possible
M040	Due regard will be given to landscape and visual design principles in the Design Specification Layout Plan post consent, with consideration of the seascape, landscape and visual impacts of the Offshore Project on the NSA. The DSLP will be shared with and approved by MD-LOT prior to construction commencing.	Pre-construction and construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	This commitment provides measures to minimise visual impacts of the Offshore Project on the NSA.
M041	The offshore construction workforce to be accommodated on vessels, with the exception of certain limited circumstances such as crew change over and leave, to reduce additional demand for housing / tourist accommodation on Lewis. Medical facilities to be provided on board vessels to treat minor injuries / illness and reduce additional pressure on existing services.	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduce additional demand for tourist accommodation on Lewis and reduce disturbance to accommodation providers for Other Sea Users and Recreation activities.
M042	Project to work with key stakeholders and service providers to understand pressure points on existing services and on storage / port facilities on Lewis, and charter vessels and/or flights to transport crew and materials where required to avoid creating excess pressure, and potentially provide additional capacity. Large construction components to be transported by specialist vessels via private charter. The Project will engage with other developers on opportunities to collaborate on transport services and storage facilities, including through the Renewable Energy Major Developments Forum.	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Reduce demand on port services and ferry capacity to reduce disruption to Other Sea Users and Recreation.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Other Sea Users and Recreation.				

Table 25.16: Summary of commitments and mitigation measures for Commercial Fisheries

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
Embedded mitigation				
M002	A Cable Installation Plan will be produced to confirm routing, method of installation and aspects such as target Depth of Burial and need for/location of/type of external cable protection. This Plan will also contain the outputs of a formal Cable Burial Risk Assessment (CBRA). Data from the project-specific geophysical surveys will be used to identify the preferred route, with the use of natural crevasses or channels within the bedrock proposed, where feasible, and areas of thicker Quaternary sediments identified (to maximise opportunities for cable burial).	Pre-construction, construction	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the Cable Installation Plan.	Time delay between sequential cable installation operations (e.g. cable-lay and post-lay protection), shall be minimised to as short as reasonably practicable, to minimise seabed disturbance and cable exposure that could interfere with fishing gear or activities.
M004	Accidental release of construction material and/or litter to be addressed via the development of procedures to retrieve the accidental deposit of an object at sea.	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine License.	To maintain navigational safety and reduce risk of gear becoming lost or damaged due to snagging.
M006	An Invasive Non-Native Species (INNS) Management Plan will be developed prior to commencement of construction (building on the **INNS Management Plan, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will be provided within the INNS Management Plan.	Promote co-operation with fishing activities, reduce the risk of impacts on target species and prevents ecological changes that could affect fish habitats
M010	Compliance with MGN 654 and its annexes including development and implementation of a Search and Rescue (SAR) Checklist, Emergency Response Cooperation Plan (ERCOP) and guard vessels as required by risk assessment.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions. Details will	To ensure navigational safety of both Offshore Project and fishing vessels and maintain good lines of communication between contractors and fishing vessels during offshore operations,

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
			be provided within the ERCOP.	as supported by appropriate offshore fisheries liaison where appropriate.
M011	The Offshore Project inclusive of surface piercing structures and subsea cables will be appropriately charted on Admiralty and aeronautical charts, and information on structure positions and heights will be provided to the UK Hydrographic Office (UKHO).	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine License.	To ensure navigational safety and minimise risk of gear snagging, 'as-laid' co-ordinates of the cable route shall be recorded and submitted to the UKHO, KIS-ORCA Service and the SFF Horizon Watch Alerts (SFF Services Limited, 2025) and communicated directly to fishing organisations in a timely manner. Sufficient detail will be shared to ensure navigational safety and inform safe fishing operations. 'As-laid' cables shall be marked on Admiralty Charts and fisherman's awareness charts (paper, electronic and plotter format). 'As laid' co-ordinates of the cable route will be updated if future changes are identified, for example during post-construction surveys.
M012	Timely and efficient distribution of Notices to Mariners (NtMs), Kingfisher notifications, and other navigational warnings of the position and nature of works associated with the Offshore Project, inc information for vessel routes, timings and locations, safety zones (around surface piercing infrastructure) and advisory passing distances. Physical notices will be places at marinas and harbours in the vicinity of the Offshore Project and final locations of installed infrastructure will be charted and distributed to recreational clubs.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the requirement for notifications and promulgation of information and will be set out within the NSVMP.	To ensure that the fishing industry is fully informed in advance of any offshore activities. Information will be circulated via NtMs and the Seafish "Kingfisher" system, and distributed by the FIR and OFLOs.

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
M013	Surface piercing structures - application for safety zones of up to 500 m during construction and periods of major maintenance, and up to 50 m pre-commissioning.	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine License.	To ensure navigational safety and minimise risk, 500 m safety zones will be implemented around the outer edge of the proposed Wind Turbine Generators (WTG) (and offshore substation platform(s) if required) during construction. A 50 m pre-commissioning safety zone will also be implemented at infrastructure locations where construction is not on-going, prior to wind farm commissioning. During the O&M phase, 500 m operational safety zones around the location of any major maintenance activities. The duration of safety zones will be monitored to assess the potential for ongoing impacts to fisheries and introduce adaptive mitigation measures, if required.
M014	Marking and lighting of the Array Area in agreement with Northern Lighthouse Board (NLB) and as per the requirements of International Association of Lighthouse Authorities (IALA) Recommendation O-139 (IALA, 2021a) and Guidance G1162 (IALA, 2021b). This will include a buoyed construction area.	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine License.	To ensure navigational safety and minimise risk of gear snagging, adequate navigational markers (including lighting), in accordance with the most recent relevant industry guidance will be ensured through preparation of an Aids to Navigation Management Plan and in consultation with fishing organisations.
M015	Compliance of all Offshore Project vessels with international marine regulations as adopted by the Flag State, notably the International Regulations for Preventing Collisions at Sea (COLREGs) (IMO, 1972/1977) and the International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974).	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine License.	To ensure navigational safety of both Project and fishing vessels and maintain good lines of communication between contractors and fishing vessels during offshore operations.

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
M016	Wind turbines blade clearance of at least 28.33 m above Mean High Water Springs (MHWS) (30 m above Mean Sea Level (MSL)).	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine License.	Promote co-operation with fishing activities, ensures sufficient clearance for fishing vessels and safe transit beneath turbine. DSLP will include final details which will be shared with relevant fisheries organisations for review.
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on **Outline Offshore EMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	To ensure that the fishing industry is fully informed in advance of any offshore activities. Information will be circulated and distributed by the project FIR and CFLO. This includes circulation of the OEMP with the fishing industry before it is finalised. The OEMP will integrate mitigation measures outlined in the FMMCP thus ensuring both plans are consistent and integrate fisheries considerations into broader environmental management procedures.
M020	A Decommissioning Plan will be developed prior to the construction of the Project in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for a Decommissioning Plan to be submitted to MD-LOT for approval and the Energy Act 2004.	To ensure navigational safety and minimise risk of gear snagging and to satisfy the requirements of the Energy Act 2004. Early engagement and coordination with the fishing industry will be undertaken to inform the Decommissioning Plan. The plan will also provide information to the fishing industry on restoration of the marine environment and information to ensure safe fishing access post-decommissioning.
M021	Adherence to requirements of the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78/. Best practice techniques employed through all phases of the	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence	Provides a plan for clear and rapid reporting within the fishing industry which will, reduce the risk of impacts on target species and

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
	Project, and measures provided in a Marine Pollution Contingency Plan (MPCP) (see **MPCP, Volume 3**). All vessels associated with the Project will comply with IMO/MCA codes for prevention of oil pollution and, where appropriate, will have onboard Shipboard Oil Pollution Emergency Plans (SOPEPs) (i.e. vessels over 400 gross tonnes (GT)).		conditions. Details will be provided within the MPCP.	mitigate potential impact on the fishing industry. The MPCP will be shared for review with fishing organisations and if a pollution event occurs at any stage of the Offshore Project, information will be distributed within the fishing industry.
M022	A final Navigational Safety and Vessel Management Plan (NSVMP) will be developed prior to commencement of construction (building on the **Outline NSVMP, Volume 3**) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-construction, construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an NSVMP to be submitted to MD-LOT for approval.	To ensure navigational safety and minimise risk of gear snagging, adequate navigational markers (including lighting), in accordance with the most recent relevant industry guidance will be ensured through preparation of an Aids to Navigation Management Plan and coordinated with the fishing industry. The plan will consider potential disruption to local fishing operations to ensure a collaborative approach.
M024	Dedicated risk assessment post consent if a location within Loch Roag/*Loch Ròg* is planned to be used as a base port taking account of vessel traffic in Loch Roag/*Loch Ròg*, full details of planned project vessels, their movements, and bases within Loch Roag/*Loch Ròg*, plus any impact on use of existing AtoNs within Loch Roag/*Loch Ròg*.	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine License	Promote co-operation with fishing activities by minimising spatial overlap with fishing grounds through engagement with local fishermen and harbour authorities.
M026	A Fisheries Mitigation, Monitoring and Communication Plan (FMMCP) (building on **FMMCP, Volume 3**) will be developed in compliance with legislative requirements and/or best practice standards and guidance prior to the operation of the Project and adhered to.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be	To establish effective mitigation measures and with detailed adaptive management strategies to maintain navigation safety, co-operation with fisheries, dissemination of information and ensure engagement between the fishing industry and the Applicant to address

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
			submitted to MD-LOT for approval.	fisheries-related impacts across all Offshore Project phases.
M027	Establishment and participation in a Project specific Commercial Fisheries Working Group (CFWG) will be undertaken to facilitate liaison between the Offshore Project and the wider fishing community.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.	The participation in a CFWG is a convenient way of meeting all fisheries stakeholders on a regular basis and disseminating information. Meeting agendas, minutes and actions will be shared in a timely manner with attendees and the CFWG will have access to all relevant Offshore Project data, such as cable routing information. Promotes collaboration and early resolution of potential conflicts with the fishing community.
M028	As outlined in the **FMMCP, Volume 3**, a Company Fisheries Liaison Officer (CFLO), Fishing Industry Representative (FIR), and Offshore Fisheries Liaison Officer(s) (OFLOs) will be appointed prior to commencement of development to liaise with local, regional and national fishing organisations, as well as individual fishers on offshore activities undertaken in relation the Offshore Project.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.	To maintain effective communications between the commercial fishing industry and the Applicant. The CFLO, FIR and OFLOs will be appointed prior to construction and will have clearly defined roles. An independent FIR will be appointed in consultation with the fishing industry to ensure impartiality. Contact details for the CFLO, FIR and OFLOs will be circulated within the fishing industry. Preparation and dissemination of project information via Notices to Mariners (NtM) and Notices to Fishermen (NtF).
M029	A Marine Coordination Centre will be established to monitor all vessel activity (Project, fishing and other maritime vessels), issue Notices to Mariners, and serve as a contact point for all maritime stakeholders.	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	To maintain effective communications between the fishing industry and the Applicant and ensure that the fishing industry is fully informed in advance of any offshore activities. Monitoring of fishn

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
				ing vessel activities will ensure information is shared with all relevant parties including fishing vessels not legally required to operate Automatic Identification System (AIS), thus maintaining navigational safety.
M030	Suitable implementation and monitoring of subsea cable burial, scour protection and cable protection in line with MGN 654 (via burial, or external protection where adequate burial depth as identified via risk assessment is not feasible). Surveys will be coordinated with the fishing industry, and results will be shared to support collaborative engagement and minimise conflict.	Pre-construction, construction, O&M and decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Cable burial will be prioritised where ground conditions allow to minimise external cable protection where possible to reduce snagging risks. Time delay between sequential cable installation operations (e.g. cable-lay and post-lay protection), shall be minimised to as short as reasonably practicable, to minimise duration of disruption to commercial fishing activity in the area of the Export Cable(s). In line with M011, cable route information will be shared with the fishing industry in a timely manner to reduce snagging and gear loss by maintaining awareness of cable locations and protection levels.
M032	A Design Specification Layout Plan (DSLP) will be developed and shared with commercial fisheries stakeholders through the Commercial Fisheries Working Group.	Pre-construction, construction	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a DSLP to be submitted to MD-LOT for approval.	To maintain navigational safety and reduce risk of gear becoming lost or damaged due to snagging the DSLP will include sufficient detail of Offshore Project infrastructure and will be shared with fishing organisations. Any changes to the DSLP will be communicated with fishing organisations in a timely manner to enable updates to the FMMCP.

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
M033	A Lighting and Marking Plan (LMP) will be developed prior to commencement of construction (building on the **Outline LMP, Volume 3**) in compliance with legislative requirements and best practice standards and guidance and adhered to.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions via the condition for a LMP to be submitted to MD-LOT for approval.	Maintains visibility and navigational safety, reducing risk to fishing operations and search and rescue operations in accordance with the most recent relevant industry guidance through preparation of an LMP. Lighting and marked areas will be monitored throughout the Offshore Project to maintain navigational safety. The LMP will include sufficient lighting and marking details to ensure maximum visibility for fishing vessels. The LMP will be shared with fishing organisations and specific lighting and marking details will also be distributed on NtMs and NtFs, and Kingfisher bulletin.
M034	Information on post construction geophysical surveys will be shared with Commercial Fisheries Working Group to communicate any changes to relocated seabed materials related to the project construction to reduce snagging risk.	Construction, O&M	Secured in the Section 36 Consent and/or Marine Licence conditions, as detailed within the FMMCP.	Promote co-operation with fishing activities, reduce the risk of entanglement and mitigate potential loss of damage to fishing gear and safety concerns. In the event of fouling of fishing gear, the primary aim is to avoid danger to the vessel, those on board, and any infrastructure that the fishing gear may have fouled
M035	Desk based monitoring of fishing operations surrounding the Offshore Project and periodic assessment of fisheries activity data pre, during and post construction.	Pre-construction, construction, O&M	Secured in the Section 36 Consent and/or Marine Licence conditions, as detailed within the FMMCP.	To maintain a precise and up to date understanding of fishing activities in zones pertinent to the Offshore Project and revise the FMMCP as appropriate by adaptive management measures.

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
				To ensure transparency, monitoring reports will be shared with fishing organisations and the CFWG.
M036	The Project will only install Wind Turbine Generators and Offshore Substation Platform (if required) above sea infrastructure within the Turbine Area.	Pre-construction, construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Provides economic benefit and minimises conflict with the local fishing fleet. All infrastructure will be charted, and information of Offshore Project infrastructure locations will be disseminated in line with M011.
M037	Use of local tour operator vessels or fishing vessels that meet relevant safety requirements, where possible to assist future Project activities, such as guard vessel opportunities.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence conditions, as detailed within the FMMCP.	To facilitate safe offshore activities by communicating with other sea users and exchange information on fishing activity and static fishing gear locations to reduce damage to fishing gear and maintain fishing vessel safety.
M038	Adherence to best practice guidance with regards to damage or loss of fishing gear that is attributable to the Offshore Project.	Pre-construction, construction, O&M and decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.	Provides clarity on incident reporting and supports fair handling of gear-loss claims. In the event of fouling of fishing gear, the primary aim is to avoid danger to the vessel, those on board, and any infrastructure that the fishing gear may have fouled.
Additional mitigation				
A001	The use of rock bags or rock berms for Offshore Cable protection within the Array Area will be limited to within 50 m of WTG and Offshore Substation Platform infrastructure.	Pre-construction, construction, O&M	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be	Promote co-operation with fishing activities, reduce the risk of entanglement and mitigate potential loss or damage to fishing gear and safety concerns.

ID	Environmental measure proposed	Project Phase Measure Introduced	How the measure will be secured	Relevance to Commercial Fisheries assessment
			submitted to MD-LOT for approval.	
A002	The Offshore Project will endeavour to route the Offshore Cables network to maximise resumption of fishing were possible.	Pre-construction, construction, O&M	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.	Promote co-operation and minimise conflict with fishing activities, by engaging with fisheries and designing cable routes to maintain, or restore access to fishing grounds during the O&M phase of the Offshore Project.
A003	Disruption Agreements will be implemented to coordinate and agree appropriate co-operation and establish evidence-based disruption payments to fishermen, where identified as significant within the EIA.	Pre-construction, construction and decommissioning	Secured in the Section 36 Consent and/or Marine Licence via the condition for an FMMCP to be submitted to MD-LOT for approval.	Provides a fair and transparent mechanism to compensate fishers for demonstrable and evidence-based disruption, supporting socio-economic resilience and minimises conflict.

Table 25.17: Summary of commitments and mitigation measures for Offshore Human Health

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Offshore Human Health assessment
Embedded mitigation				
M019	A final Offshore Environmental Management Plan (OEMP) will be developed prior to commencement of construction (building on Outline Offshore EMP, Volume 3) in compliance with legislative requirements and/or best practice standards and guidance and adhered to.	Pre-Construction, construction	Secured in the Section 36 Consent and/or Marine Licence via the condition for an OEMP to be submitted to MD-LOT for approval.	The OEMP will set out measures which will reduce the potential for human health effects
M040	Due regard will be given to landscape and visual design principles in the Design Specification Layout Plan post consent, with consideration of the seascape, landscape and visual impacts of the Offshore Project on the NSA. The DSLP will be shared with and approved by MD-LOT prior to construction commencing.	Pre-Construction, construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Mitigation through design will reduce the potential negative wellbeing impact of changes to visual and landscape.
M041	The offshore construction workforce to be accommodated on vessels, with the exception of certain limited circumstances such as crew change over and leave, to reduce additional demand for housing/tourist accommodation on Lewis/*Eilean Leòdhais*. Medical facilities to be provided on board vessels to treat minor injuries/illness and reduce additional pressure on existing services	Construction	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Relevant to the assessment of effects on health care facilities.
M042	Project to work with key stakeholders and service providers to understand pressure points on existing services and on storage/port facilities on Lewis, and charter vessels and/or flights to transport crew and materials where required to avoid creating excess pressure and potentially provide additional capacity. Large components to be transported by specialist vessels via private charter. Potential for collaborative approaches with other developers, including through the Renewable Energy: Major Developments Forum	Pre-Construction, Construction, Operation and Maintenance and Decommissioning	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Working with key project stakeholders and other developers can reduce additional pressure on existing healthcare services.

ID	Environmental measure proposed	Project phase measure introduced	How the environmental measures will be secured	Relevance to Offshore Human Health assessment
M044	The Project is committed to the establishment of a Community Panel (subject to agreed community participation), comprising a range of community representatives with relevant experience and local knowledge. The purpose of the panel will be to ensure that local voices and perspectives can inform delivery of the Project as it progresses. It is proposed that the panel would be in place prior to the commencement of major construction activities and would be maintained throughout construction and commissioning. During operation, the Project will continue to engage with local communities and will provide opportunities for local residents to contact the Project team, including through dedicated resources within the operation and maintenance team with responsibility for community engagement.	Construction, operation and maintenance	To be secured through a condition of the Section 36 consent and/or Marine Licence.	Community engagement and mechanisms for local perspective can reduce potential human health impacts.
Secondary mitigation				
No secondary mitigation, over and above the proposed embedded mitigation measures, is either required or proposed in relation to the potential effects of the Offshore Project on Offshore Human Health.				

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