MachairWind Offshore Windfarm

Nature Positive Plan

ScottishPower Renewables | MachairWind Offshore Windfarm

JUNE 2026

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Nature Positive Plan

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Revision Summary				
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Description of Revisions			
Rev	Page	Section	Description
1	All	All	Snagged and issued for use

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GLOSSARY OF ACRONYMS

Acronym	Definition
BGS	British Geological Survey
CEMNID	Collaboration For Environmental Mitigation and Nature Inclusive Design
CES	Crown Estate Scotland
CIEEM	Chartered Institute of Ecology and Environmental Management
DAERA	Department of Agriculture, Environment and Rural Affairs
ECC	Export Cable Corridor
EcIA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
FMS	Fisheries Management Scotland
IAC	Inter-Array Cable
IEF	Identified Ecological Feature
LAT	Lowest Astronomical Tide
LBAP	Local Biodiversity Action Plan
LDP	Local Development Plan
MD-LOT	Marine Directorate – Licensing and Operations Team
MHWS	Mean High Water Springs
MIFA	Mull And Iona Fishermen's Association
MPA	Marine Protected Area
NID	Nature Inclusive Design
NMP	National Marine Plan
NPF	National Planning Framework
NPP	Nature Positive Plan
NPS	Nature Positive Strategy
NTS	National Trust for Scotland
OnTDA	Onshore Transmission Development Area
OSP	Offshore Substation Platform
PMF	Priority Marine Feature
POA	Plan Option Area
RSPB	Royal Society for The Protection Of Birds
SAC	Special Area of Conservation

Acronym	Definition
SAMS	Scottish Association for Marine Science
SPA	Special Protection Area
WDA	Windfarm Development Area
WTG	Wind Turbine Generator

GLOSSARY OF TERMS

Term	Definition
Cable protection	Protective measure to minimise the effects of scour and hazards along the offshore cables (e.g. to prevent cable exposure or snagging of vessel anchors or fishing gear), as well as for protecting these cables at infrastructure crossing points.
Combined Assessment	A whole-Project assessment considering interactions between the Windfarm Development Area, Offshore Export Cable Corridor and Onshore Transmission Development Area (i.e. considering impact interactions and additive effects to determine if any effects would be materially elevated from those assessed for the Windfarm Development Area-alone assessment). Due to long delays in securing confirmation of the Project's grid connection location, the level of detail available for the Offshore Export Cable Corridor and Onshore Transmission Development Area is limited and therefore the assessment is commensurate with the level of detail available at the time of carrying out the assessment. Within the upcoming Offshore Export Cable Corridor and Onshore Transmission Development Area consent applications, their respective scoping and Environmental Impact Assessment Report / Environmental Report will take account of all likely effects predicted within the WDA EIA and present updated combined assessments using the latest available information covering all aspects of the Project.
Development Area	Application boundary for consenting purposes which, for the Project, consists of a Windfarm Development Area, Offshore Export Cable Corridor, and Onshore Transmission Development Area. Separate consent and marine licence applications will be submitted for each Development Area where applicable.
Embedded mitigation measure	Mitigation measures, including industry good practice measures, that are directly incorporated into the design for the MachairWind Windfarm Development Area to avoid or reduce environmental effects.
Environmental DNA (eDNA)	Environmental DNA that is collected from the environment, such as in seawater, rather than directly from an individual organism.
Environmental Impact Assessment (EIA)	The process of evaluating the likely significant environmental effects of a proposed development over and above the existing circumstances (or 'baseline').
Inter-array cables (IACs)	Armoured cable containing electrical and fibre optic cores which link the wind turbine generators to each other and to the offshore substation platform(s).
Lowest Astronomical Tide (LAT)	The lowest level that can be expected to occur under average meteorological conditions and under any combination of astronomical conditions.
MachairWind Offshore Windfarm	An offshore windfarm capable of exporting around 2 GW of renewable energy to the National Electricity Transmission System. MachairWind Offshore Windfarm comprises three Development Areas: • The WDA – located on the west coast of Scotland to the northwest of Islay and west of Colonsay; • The Offshore Export Cable Corridor – a preliminary boundary extending from the WDA to mean high water springs at a landfall location near Girvan, South Ayrshire; and • The Onshore Transmission Development Area – a preliminary boundary which extends landward from mean low water springs and includes the land required for the landfall of the offshore export cables and their route up to but not including the proposed high voltage direct current switching station which will be developed and constructed by Transmission Owner, ScottishPower Transmission. Separate consent and licence applications will be submitted for each Development Area.

Term	Definition
Mean High Water Springs (MHWS)	The average, over a year, of the heights of two successive high waters during those periods of 24 hours (once every fortnight) when the range of the tide is greatest.
Mean Low Water Springs (MLWS)	The average, over a year, of the heights of two successive low waters during those periods of 24 hours (once every fortnight) when the range of the tide is greatest.
Offshore cables	The collective term for all offshore cables i.e. IACs, offshore substation platform link cables, offshore export cables and associated fibre optic cables.
Offshore ECC infrastructure	The offshore transmission infrastructure located within the boundary of the Offshore Export Cable Corridor, namely the offshore export cable(s).
Offshore export cable	Armoured cable containing electrical cores between the offshore substation platform(s) and landfall. Offshore export cables will include bundled fibre optic cables. The offshore export cables are subject to Marine Licence applications under the Marine (Scotland) Act 2010. The portion of the offshore export cable(s) located within the WDA is assessed as part of this MachairWind WDA EIA and a marine licence application to construct, alter or improve this portion has been submitted alongside the WDA application. A separate marine licence application will be submitted for the portion of the offshore export cable(s) from the WDA boundary to mean high water Mean High Water Springs.
Offshore Export Cable Corridor (ECC)	The preliminary boundary extending from the WDA to mean high water springs near Girvan, South Ayrshire and within which the offshore export cable(s) will be located. A separate marine licence application will be submitted for the offshore export cable(s) located within the Offshore ECC.
Offshore Substation Platform (OSP)	An offshore platform with a fixed foundation located within the WDA which houses electrical equipment such as transformers, switchgear, protection and control systems, and enables the windfarm's renewable electricity to be collected via inter-array cables and exported to the National Electricity Transmission System via offshore export cables.
Onshore Transmission Development Area (OnTDA)	The preliminary boundary which extends landward from mean low water springs and includes the land required for the landfall of the offshore export cables and their route up to but not including the proposed high voltage direct current switching station which will be developed and constructed by Transmission Owner, ScottishPower Transmission. This Transmission Owner is responsible for consenting the high voltage direct current switching station. Onward connections to the National Electricity Transmission System will be consented by National Grid Electricity Transmission and ScottishPower Transmission. Where relevant, these are considered as part of cumulative effects assessment in the EIA.
OnTDA infrastructure	The onshore transmission infrastructure, for which the Applicant is responsible, that is located primarily within the OnTDA, up to mean low water springs, and includes but is not limited to: landfall(s), onshore export cables, transition joint bays, telecom/SCADA infrastructure including vehicular access, joint bays, link boxes and temporary construction compounds. The OnTDA infrastructure will be subject to a planning application under the Town and Country Planning (Scotland) Act 1997.
Option Agreement Area (OAA)	The seabed area awarded to ScottishPower Renewables in January 2022 through the ScotWind leasing round.
Rochdale Envelope	An approach to environmental assessment which aims to take account of the need for flexibility in the future evolution of the detailed project proposal. The approach is named after two court rulings concerning outline planning applications for a proposed business park in Rochdale.
Scottish Marine Area	The area of Scotland's territorial sea limit (up to 12 nautical miles from baseline) as defined in the Marine (Scotland) Act 2010.

Term	Definition
ScotWind	A Crown Estate Scotland seabed leasing round which enabled developers to propose offshore wind projects and apply for seabed rights to plan and build windfarms in Scottish waters.
Scour protection	Protective measures to avoid sediment being eroded away from the base of the wind turbine generator foundations as a result of the flow of water.
The Applicant	The legal entity submitting consent applications for the MachairWind Offshore Windfarm, namely MachairWind Limited.
The Project	MachairWind Offshore Windfarm including all its Development Areas and associated infrastructure.
Windfarm Development Area (WDA)	The application boundary within the OAA where consent will be sought for the proposed WDA infrastructure. The WDA infrastructure is subject to Section 36 consent and marine licence applications (generation and transmission) which are being applied for separately from the Offshore ECC infrastructure and OnTDA infrastructure.
WDA infrastructure	The offshore generation and transmission infrastructure located within the WDA including but not limited to: WTGs, WTG fixed foundations (and associated scour protection), OSP(s), OSP fixed foundations (and associated scour protection), IACs, OSP link and offshore export cable(s) and their associated external cable protection (insofar as these are located within the WDA) and fibre optic cables.
Wind Turbine Generator (WTG)	A wind turbine generator which converts wind energy into electrical energy. Each wind turbine generator is a complex system composed of a high number of components. Typically, the main components include the rotor assembly (composed of three blades and a hub); the nacelle (containing a generator, shaft and gearbox, power electronic converter and transformer); and the tower (containing lifting equipment and the switchgear).

1 INTRODUCTION

1.1 PURPOSE

1. This Nature Positive Plan (NPP) sets out the approach for identifying, assessing, and delivering biodiversity enhancement opportunities within the MachairWind Windfarm Development Area (WDA). It provides the first component of the project-wide NPP, which will ultimately encompass the Offshore Export Cable Corridor (ECC) and Onshore Transmission Development Area (OnTDA) as those designs mature, and consent applications are sought after.

2. The purpose of the NPP is to ensure that biodiversity considerations and nature-positive opportunities are integrated into decision-making at the earliest possible stage (**Figure 1.1**). By focusing initially on the WDA, where environmental understanding is most advanced, the Applicant can begin shaping enhancement principles, ecological priorities, and mechanisms for delivery that will be expanded and refined across the full project footprint. This plan sets out the current potential options on which the Applicant is considering doing further analysis in order to reach the Project's nature-based goals.

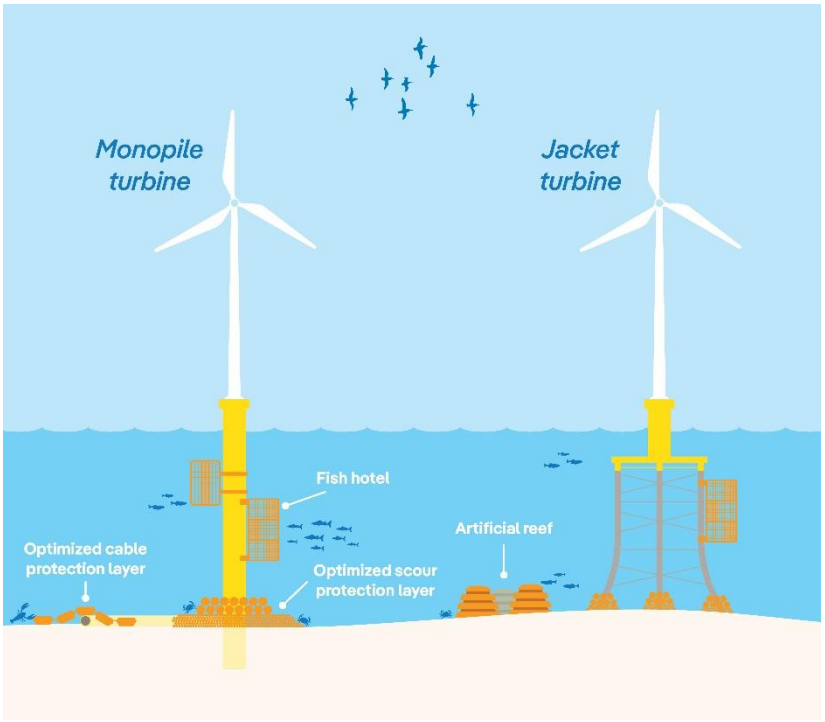


Figure 1.1 Illustrative image of potential nature positive options to show how they can be integrated into the design of the windfarm

1.2 PROJECT OVERVIEW

3. In April 2022, as part of the ScotWind leasing round, MachairWind Ltd ('The Applicant') entered into an Option to Lease Agreement with Crown Estate Scotland (CES) for the entire W1 Plan Option Area (POA). Since being awarded the site, W1, The Applicant has been undergoing a refinement exercise through desk-top studies and preliminary ground investigation surveys, which has enabled the identification of an optimised development area of 448km^2 referred to as the WDA. More information on the WDA can be found in **Section 1.2.1**.

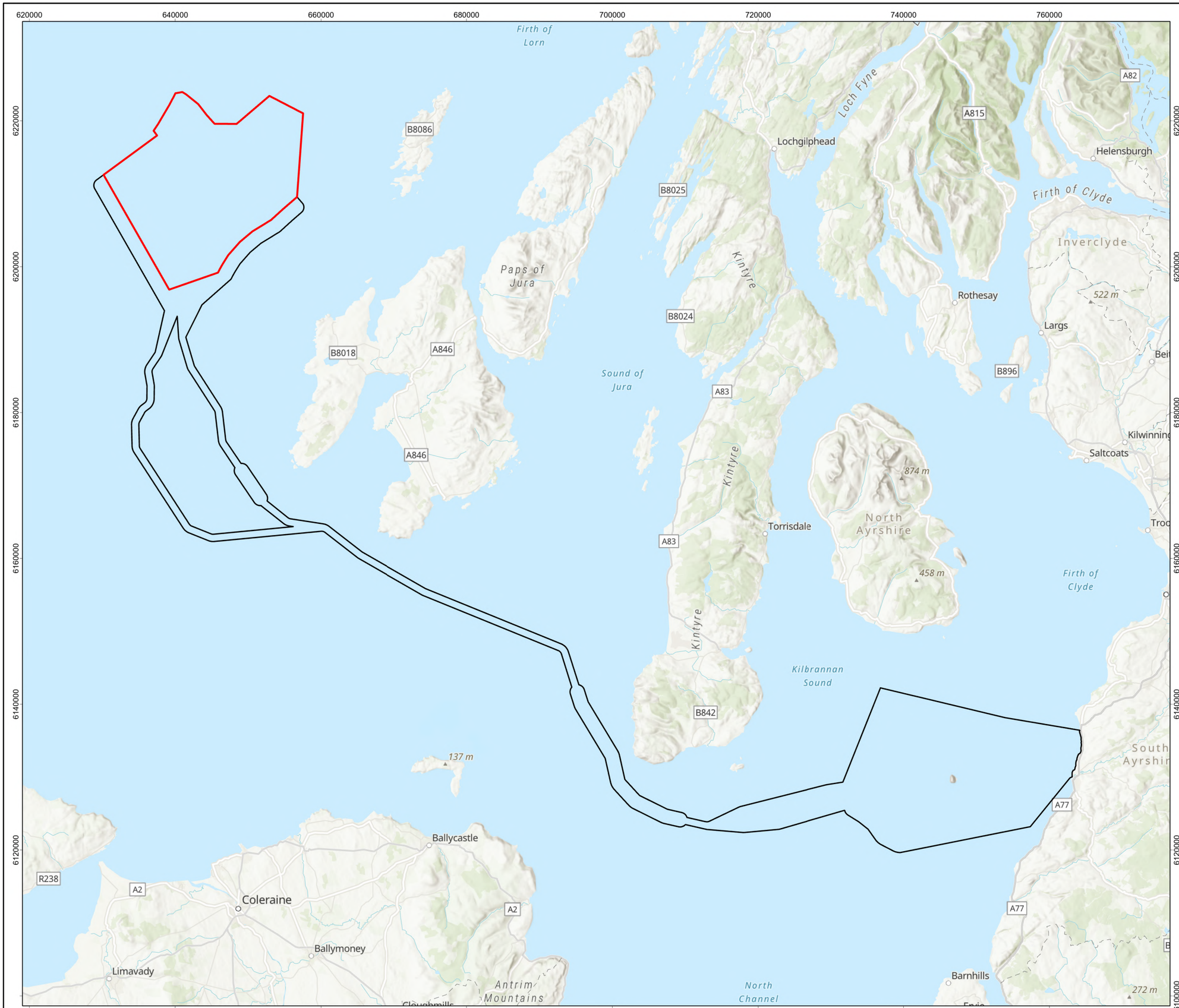
4. For consenting purposes, the Project has been split into the following three Development Areas for which separate consents and/or licences will be sought by the Applicant for the respective infrastructure:

- The WDA for the installation and operation of the WDA infrastructure (noting this includes the portion of the offshore export cable(s) located therein);
- The Offshore ECC, for the installation and operation of the Offshore ECC infrastructure; and
- The Onshore Transmission Development Area (OnTDA), for the installation and operation of the OnTDA infrastructure.

5. This NPP will be submitted alongside the WDA consent application, but, as a live document, it will be updated as the Project develops to consider the other key infrastructure described in **Table 1.1**.

Table 1.1 Details of each Development Area with the key infrastructure expected for each area.

Development Area	Location	Key Infrastructure
WDA	Within W1	• Wind Turbine Generators (WTGs), associated fixed foundations and scour protection; • Offshore Substation Platforms (OSPs), associated fixed foundations and scour protection; • Inter-Array Cables (IACs); • OSP link cables; • Offshore export cable(s) (insofar as these are located within the WDA application boundary and with consent being sought for up to a total length of 200 km for up to four offshore export cable(s)); and • Associated external cable protection for the above offshore cables.
Offshore ECC	A preliminary Offshore ECC has been defined and is shown in **Figure 1.2**. This extends from the WDA to Mean High water Springs (MHWS).	• Offshore export cable(s) including any associated external cable protection.
OnTDA	A preliminary OnTDA has been defined (**Figure 1.3**) which extends landward of MLWS.†	• Landfall(s); • Onshore export cable(s) including associated onshore infrastructure; and • Temporary construction compound(s).



Windfarm Development Area

Offshore Export Cable Corridor

N

0 5 10 15 20 Kilometres

REV	REV DATE	GIS CREATOR	GIS REVIEWER	TECHNICAL CHECKER	TECHNICAL APPROVER
1	18/02/2026	AB	GC	PM	CG

DRAWING NUMBER	MCW-DWF-ENV-MAP-RHS-000190
DATUM	ETRS89
PROJECTION	UTM Zone 29N
SCALE	1:500,000
PAGE SIZE	A3
PROJECT TITLE	MachairWind

Figure 1.2: Offshore Export Cable Corridor – the preliminary boundary extending from the WDA to mean high water springs near Girvan, South Ayrshire and within which the offshore export cable(s) will be located

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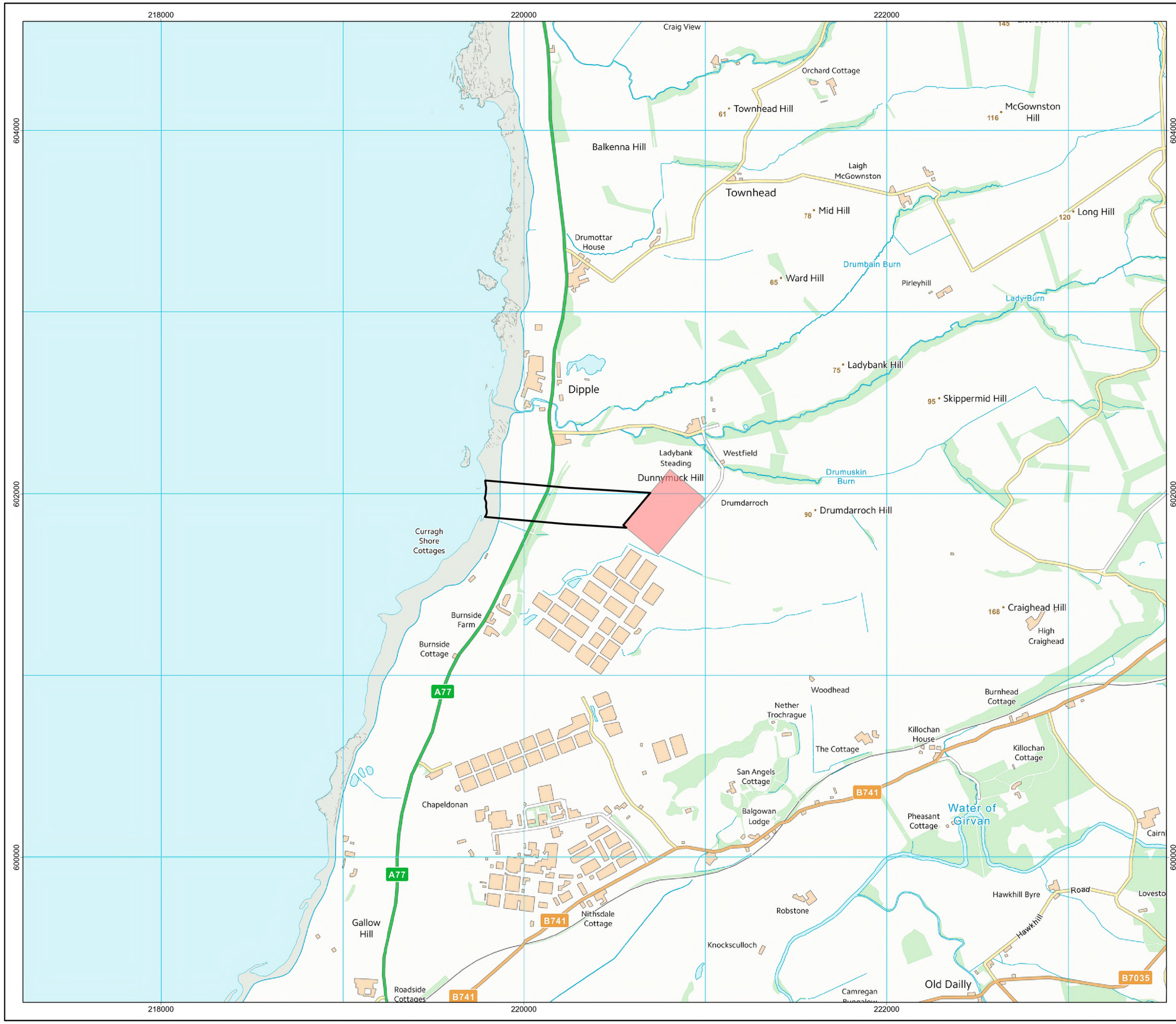

REV	REV DATE	GIS CREATOR	GIS REVIEWER	TECHNICAL CHECKER	TECHNICAL APPROVER
1	18/02/2026	AB	GC	PM	CG

DRAWING NUMBER	MCW-DWF-ENV-MAP-RHS-000191		
DATUM	OSGB 1936	PROJECTION	British National Grid
SCALE	1:20,000	PAGE SIZE	A3
PROJECT TITLE	MachairWind		

Figure 1.3: Onshore Transmission Development Area

NOT TO BE USED FOR NAVIGATION

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1.2.1 Windfarm Development Area

6. The WDA is located northwest of Islay and west of Colonsay and covers an area of 448 km^2. The approximate distances to the nearest islands, at the closest point, are:

- 12.4 km west of Colonsay;
- 15 km northwest of Islay;
- 20 km southwest of Mull;
- 21 km southwest of Iona; and
- 30 km west of Jura.

7. Water depths within the WDA range from 21.6 m to 81.7 m below Lowest Astronomical Tide (LAT). The bathymetry across the WDA is highly variable in some locations whilst changes in bathymetry are more gradual in others. Towards the east and west of the WDA, bathymetry is similar, approximately between 40 m below LAT and 60 m below LAT. This is divided by a central north-north-east to south-south-west zone of generally lower bathymetry, approximately between 60 m below LAT and 70 m below LAT. The west of the WDA is characterised by sandwaves and a sandbank in the southwest. The maximum sandwave height in this region is approximately 6.6 m with wavelengths generally exceeding 200 m.

8. With respect to shallow bedrock, the bedrock towards the north of the WDA consists of undifferentiated rocks, including mudstone, sandstone and limestone (British Geological Survey (BGS), 2023). Across the centre of the WDA (east to west) a greater variety of undifferentiated rocks are present, comprising mudstone, sandstone, limestone, siliciclastic and argillaceous (BGS, 2023). In the south of the WDA, the bedrock is mainly metamorphic (metasedimentary) rocks.

1.3 RELATIONSHIP TO ENVIRONMENTAL IMPACT ASSESSMENT

9. This NPP complements the Environmental Impact Assessment (EIA) by identifying opportunities to deliver nature-positive outcomes in parallel with the assessment of potential environmental effects. While the EIA evaluates impacts and mitigation measures, the NPP goes further by exploring options to enhance ecological value within the WDA.

10. The NPP should therefore be read in conjunction with the following Chapters within the WDA EIA Report (EIAR):

- **Chapter 1 Introduction**;
- **Chapter 3 Project Description**;
- **Chapter 4 Site Selection and Alternatives**;
- **Chapter 7 Marine Physical Environment**;
- **Chapter 8 Benthic Ecology**;
- **Chapter 9 Fish (including Basking Shark) and Shellfish**;
- **Chapter 10 Marine Mammals and Leatherback Turtle**;
- **Chapter 11 Offshore Ornithology**; and
- **Chapter 12 Commercial Fisheries**.

11. As MachairWind progresses through the consenting process, additional NPP components for the Offshore ECC and OnTDA will be developed. These measures will consider terrestrial, coastal, and intertidal receptors, taking a holistic approach to understanding the Project's overall effects on nature.

2 LEGISLATION, POLICY AND GUIDANCE

2.1 INTRODUCTION

12. The Applicant is committed to delivering a nature-positive outcome, consistent with national policy commitments and emerging expectations for biodiversity enhancement within Scotland's marine environment. This section outlines the legislative, policy, and guidance framework relevant to biodiversity protection, ecological enhancement, and nature-positive action for the MachairWind Offshore Windfarm.

13. Whilst Scotland's National Marine Plan (NMP) (2015) provides the primary policy consideration and reference point for assessing the MachairWind WDA consenting applications, more recent policies including National Planning Framework 4 (NPF4) (2023) are also of relevance. The strategic principles relating to biodiversity enhancement and nature restoration within NPF4 remain applicable and are adopted here in the absence of an updated NMP2.

14. To support transparency in how these requirements and expectations have been considered, **Table 2.1** summarises the key legislative, policy and guidance sources that underpin the Project's nature-positive ambition and their relevance to the assessment.

15. This section also clarifies the approach used to identify, assess, prioritise and integrate nature-positive opportunities within the WDA, drawing on the Chartered Institute of Ecology and Environmental Management (CIEEM) (2024) Engineering Construction Industry Association (EcIA) Guidelines to evaluate ecological value, predict significance of effects, and inform the development of appropriate biodiversity enhancement measures. The framework presented ensures that enhancement considerations are embedded within the EIA process, support the Project's overarching objective to contribute positively to marine biodiversity, and guide the development of subsequent NPP components for the Offshore ECC and OnTDA once locations are confirmed.

Table 2.1 Summary of relevant legislation, policy and guidance

Relevant Policy and Guidance	Relevance to the Plan
Legislation	
Marine (Scotland) Act 2010	Establishes the framework for marine planning and conservation in Scottish waters (0–12 nautical mile). Includes statutory duties to protect and enhance marine biodiversity and supports designation/management of Marine Protected Areas (MPAs) and Priority Marine Features (PMFs), directly informing nature-positive opportunities.
Electricity Act 1989 (Section 36)	Provides the consent process for offshore generating stations. The legislative framework does not prescribe detailed criteria for the determination of applications, meaning that a wide range of relevant and important considerations including biodiversity protection and enhancement objectives as well as policy expectations should be taken into account.
Policy	
Scotland's National Marine Plan (NMP) (2015)	Notwithstanding the age of the document, the adopted NMP (2015) remains the primary consideration and reference point for assessing the MachairWind WDA consenting applications. Relevant policies including GEN 9 require development to both protect and, where appropriate, enhance the health of the marine area. This policy also highlights the national status of PMFs and advises that "*consideration should be given to opportunities to enhance biodiversity and associated*

Relevant Policy and Guidance	Relevance to the Plan
	ecosystem services, including recovery and/or enhancement of degraded habitats or species populations".
National Marine Plan 2 Planning Position Statement	Scotland's NMP is in the process of being updated, transitioning to the Scottish NMP2, with the aim of delivering a new plan that implements the Scottish Government's Blue Economy Vision (Marine Scotland, 2022) and takes account of changes to the wider policy and legislative landscape and rapid developments in technology. Published in November 2024, the NMP2 Planning Position Statement outlines initial consideration of how new policies could enable nature positive development and support the application of nature inclusive design in the marine environment. Whilst the Statement sets out initial policy ideas for consultation it does not yet identify preferred policies, which are anticipated to be defined within the Draft NMP2. However, in Autumn 2025 the Scottish Government decided to postpone consultation on Draft NMP2 to allow for further consideration and refinement (Scottish Government, 2025b) and at the time of writing no further updates are available.
National Planning Framework 4 (NPF4) (2023)	NPF4 forms part of the statutory Development Plan for town and country planning and therefore primarily applies onshore down to Mean Low Water Springs, although it also forms a valid and relevant consideration in the determination of wider consenting applications such as those submitted at this stage for the WDA infrastructure. The Framework embeds Scotland's requirements for nature restoration, biodiversity enhancement and the transition to a nature positive economy. Policy 3 requires proposals for National Developments to "conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention" and therefore to provide significant biodiversity enhancements.
Scottish Government Biodiversity Planning Guidance (2025)	Finalised in December 2025, this guidance sets out the Scottish Ministers' expectations for implementing NPF4 policies which support the cross-cutting NPF4 outcome of 'improving biodiversity'. The guidance specifically relates to NPF4 Policy 3 in terms of delivering biodiversity enhancement through development.
Local Biodiversity Action Plans (LBAPs)	Although offshore areas are not governed by LBAPs, coastal LBAPs can inform potential enhancement opportunities near landfall or cable routes (once known). Included only for completeness until these elements have been confirmed.
Argyll & Bute Local Development Plan (LDP)	Policies 4 (Natural Heritage) and 28 (Green Infrastructure) of the LDP set out local objectives for protecting and enhancing biodiversity and ecological networks. Whilst the jurisdiction of the LDP does not extend below Mean Low Water Springs (MLWS) and therefore does not apply to the WDA, these policies provide relevant local context for the NPP by informing regional nature positive priorities and expectations.
Guidance	
CIEEM Guidelines for Ecological Impact Assessment in the UK & Ireland: Terrestrial, Freshwater, Coastal & Marine (2024)	Provides the recognised UK and Ireland best-practice framework for undertaking ecological impact assessments in marine and coastal environments. The guidance sets out robust methods for evaluating ecological value, predicting and assessing impacts, and identifying opportunities for biodiversity enhancement and nature-positive outcomes as part of the EIA process.

Relevant Policy and Guidance	Relevance to the Plan
Collaboration for Environmental Mitigation and Nature Inclusive Design (CEMNID) (2024)	Provides the emerging evidence base for the design and implementation of marine nature-based interventions in Scottish waters. The CEMNID programme outlines practical mechanisms through which offshore developments can contribute to ecosystem recovery, including habitat enhancement, restoration of degraded seabed features, and opportunities to support PMFs. It is directly relevant to the NPP as it informs how enhancement actions can be targeted, feasible, and aligned with Scottish Government expectations for nature restoration and marine biodiversity improvement.

2.2 NATURE POSITIVE STRATEGY AND ASSESSMENT FRAMEWORK

16. The Applicant's Nature Positive Strategy (NPS), which was consulted and agreed upon previously (**Section 4**), provides the overarching framework for the development and implementation of this NPP. In the absence of a statutory biodiversity metric in Scotland and recognising that Biodiversity Net Gain tools such as DEFRA's Biodiversity Metric 4.0 are designed for terrestrial environments and are not adapted for Scottish marine conditions, the NPP adopts a qualitative, EIA-led approach. This methodology is considered the most appropriate for an offshore project at this stage of design, enabling the identification of meaningful and feasible enhancement opportunities while avoiding reliance on metrics that are not reflective of the ecological context of the WDA.

3 APPROACH TO NATURE ENHANCEMENT

3.1 OUTLINE

17. The MachairWind NPS presented a structured framework for delivering biodiversity enhancement across both onshore and offshore elements of the Project. It responded directly to the requirements of NPF4, particularly Policy 3 on biodiversity, which mandates that major developments must conserve, restore, and enhance biodiversity to leave it in a demonstrably better state than without intervention.

18. The NPS outlines a four-stage process for developing the NPP:

- Biodiversity and Habitat Baseline Assessment – Identifying ecological receptors and habitat value through desk-based studies, designated site reviews, and site-specific surveys.
- Market Review – Evaluating available and emerging biodiversity enhancement options, including nature-inclusive design, species-specific measures, and offsetting opportunities.
- Project Review – Assessing feasibility, risks, and opportunities of enhancement options to refine the design envelope.
- Measurement, Delivery and Monitoring – Using CIEEM EcIA guidelines to evaluate ecological significance and adopting adaptive management to ensure long-term success.

19. The NPP is being submitted alongside the WDA's consenting applications. Monitoring and reporting will be tailored to the selected enhancement measures and will inform adaptive management as the Project progresses. As a live document, the NPP will be refined as new data becomes available and as Project design develops. Its evolution will be supported by ongoing engagement with local fisheries and other stakeholders, monitoring feedback, and periodic review to ensure the plan remains responsive, effective, and aligned with emerging best practice.

3.2 GUIDING PRINCIPLES

20. The Applicant's biodiversity enhancement approach is rooted in the principle of delivering material, measurable, and lasting ecological benefits. Enhancements will be designed to complement existing habitats, support species recovery, and contribute to wider nature networks. This aligns with NPF4's emphasis on considering nature-based solutions and strengthening ecological connectivity, as well as the core principles of the Scottish Government's Biodiversity Planning Guidance (2025) referenced in **Table 2.1**. Scotland's NMP (2015) rather than NPF4 (2023) is the primary consideration and reference point for the determination of the consenting applications for the WDA infrastructure at this time, but as this NPP applies to the whole Project (including onshore elements) and NPF4 remains a valid consideration, the core principles outlined in this guidance will be applied where appropriate. With reference to these principles:

- Relevance: Enhancement measures will be selected based on a thorough understanding of the ecological context of the site and surrounding area, including species presence, habitat condition, and proximity to designated areas. This ensures interventions are ecologically meaningful and tailored to local needs. Deliverability: All proposed enhancement actions will be assessed for technical, financial, and logistical feasibility, including engineering constraints, land and seabed availability, regulatory requirements, and alignment with the project timeline. Deliverability ensures biodiversity gains are achievable within the scope of the development and supports integration of nature-based solutions that deliver multiple benefits.
- Proportionality: Enhancement efforts will be proportionate to the predicted scale and nature of ecological impacts of the Project, with opportunities to deliver benefits to impacted features prioritised where it is possible and reasonable to do so. Proportionality ensures efficient resource

allocation and that biodiversity gains are commensurate with the project's footprint and effects in order to deliver nature positive outcomes.

- Connectivity: Measures will aim to improve ecological connectivity by linking fragmented habitats, creating corridors for species movement, and contributing to regional nature networks. This supports ecosystem resilience, facilitates species dispersal, and aligns with NPF4's emphasis on strengthening nature networks.
- On-site and Off-site Delivery: Enhancement measures will consider both on-site and off-site opportunities to enable the delivery of a nature-positive outcome. While on-site actions will be prioritised where feasible, off-site measures may be pursued where they provide greater ecological benefits or strengthen wider nature networks, ensuring the overall approach maximises biodiversity gains.
- Place-based and Inclusive Approach: Enhancement planning will consider local ecological character and involve relevant stakeholders where appropriate, ensuring measures consider community priorities and regional biodiversity objectives.
- Long-term Viability: To secure lasting biodiversity benefits, measures will be designed with sustainability in mind. This includes establishing management regimes, securing funding for maintenance, and implementing monitoring protocols. Adaptive management will allow adjustments based on monitoring results, ensuring measures remain effective over time and respond to changing conditions.
- Additionality: Enhancement measures will deliver biodiversity gains beyond those required for mitigation under the mitigation hierarchy. This ensures that measures provide genuine, additional benefits rather than duplicating existing obligations.

3.3 INTEGRATION WITH MITIGATION HIERARCHY

21. The NPP works alongside, and is informed by, the mitigation hierarchy, which is addressed comprehensively within the EIA. The hierarchy provides a recognised framework for managing ecological effects and is applied in a sequential manner: avoid, minimise, restore, and enhance.

22. Enhancement goes beyond mitigating specific impacts. It involves proactively improving biodiversity or ecosystem condition beyond the baseline. While not intended to compensate directly for predicted effects, enhancement measures can contribute meaningfully to wider ecological priorities, such as improving habitat networks, supporting species recovery, and increasing ecosystem resilience.

23. Enhancement opportunities are guided by baseline understanding, feasibility considerations, and the potential to deliver clear and measurable ecological benefits. By integrating enhancement into the Project lifecycle and applying adaptive management informed by monitoring, MachairWind aims to contribute positively to nature and help ensure that the marine environment is in a better condition over the long term.

3.4 COMBINED ENHANCEMENTS

24. The NPP for MachairWind is being developed in phases, starting with the WDA and expanding to include the Offshore ECC and OnTDA as those aspects of the Project become more defined. While this version focuses on the WDA, the Applicant intends to explore how nature-positive opportunities could be coordinated across the full Project footprint as understanding evolves.

25. As design development progresses and additional baseline information becomes available, there may be opportunities to consider how enhancement measures across the offshore, nearshore, and onshore environments could complement one another or contribute collectively to wider ecological objectives. Any future enhancements will be subject to feasibility considerations, stakeholder input, and a clear evidence base.

26. This phased and flexible approach ensures that the NPP can evolve over time, supporting the Applicant's ambition to work towards nature-positive outcomes without pre-determining specific commitments at this stage. As the NPP is refined, the potential to integrate enhancement opportunities across all parts of the Project will be kept under review to ensure alignment with emerging best practice and regulatory expectations.

4 CONSULTATION

4.1 PRE-APPLICATION CONSULTATION AND WIDER ENGAGEMENT

27. The Applicant issued the MachairWind NPS to stakeholders, providing the opportunity for consultees to review, comment on and inform the proposed strategy which outlined the Applicant's approach to implementing nature positive options.

28. The NPS was issued on 14 July 2025 to the following consultees:

- Argyll and Bute Council;
- Department of Agriculture, Environment and Rural Affairs (DAERA);
- Fisheries Management Scotland (FMS);
- Marine Directorate – Licensing and Operations Team (MD-LOT);
- National Trust for Scotland (NTS);
- NatureScot;
- Royal Society for the Protection of Birds (RSPB); and
- Scottish Environment LINK.

29. The consultation outcomes in relation to the NPS and wider engagement in relation to the Nature Positive workstream as a whole are outlined in **Table 4.1,** which summarises stakeholder feedback, outlines how the Applicant has responded to the feedback received, and details how it has been considered within this document.

Table 4.1 Summary of consultation comments and responses from Stakeholders

I.D	Consultee	Date/Engagement Activity	Stakeholder Comment	Applicant Response
Nature Positive Strategy				
1	NatureScot	25 August 2025, Email correspondence	It is noted in Section 3.1 that the development of the Nature Positive Plan (NPP) will comprise four phases – baseline assessment; market review; project review and measurement, implementation and monitoring, which we support - Figure 3-1 is a useful diagrammatic representation of the four key phases. In relation to the baseline assessment description as set out in Section 3.2, we suggest that PMFs are included as potential receptors.	Regarding the baseline assessment, the Applicant agrees with the suggestion to include PMFs as potential receptors and has updated Section 3.2 in the NPS accordingly.
2	NatureScot	25 August 2025, Email correspondence	It isn't clear from the NPS when/if further consultation will be undertaken with us through any of the phases. Regarding implementation (Section 3.5.2), we support an adaptive management approach, and this should be linked to the monitoring objective set up for each action. It may be useful to discuss implementation and monitoring during the consideration and selection of the short list of potential actions with NatureScot.	The Applicant acknowledges that the NPS did not specify when further consultation will occur, however the Applicant is committed to meaningful stakeholder engagement throughout the NPP process. The strategy for engagement entails submitting the NPP alongside the WDA consent applications, which will detail the potential options the Applicant is considering for the WDA. The NPP is intended to be a live document, therefore the Applicant welcomes and encourages ongoing engagement following consent applications submission. The Applicant would welcome the opportunity to engage further on the implementation and monitoring in relation to the Nature Positive options that have been selected.
3	NatureScot	25 August 2025, Email correspondence	Figure 3-2 sets out the definitions of key characteristics to be used during the assessment. The term 'Extent' is described as 'the extent of a positive effect is the spatial and geographical area over which the effect may occur' and we suggest that scale should not be the only factor considered if the Identified Ecological Feature (IEF) is scarce, rare or limited in extent. In addition, we advise that you may wish to add in consideration of	Feedback on the definition of 'Extent' has been noted. The Applicant agrees that scarcity, rarity, and limited distribution of Identified Ecological Features (IEFs) should be considered alongside scale, and Figure 3-2 within the strategy has been updated accordingly. Regarding 'Reversibility', the Applicant acknowledges the need to consider alignment with decommissioning activities and the

I.D	Consultee	Date/Engagement Activity	Stakeholder Comment	Applicant Response
			scarcity, rarity etc. as a key characteristic of the assessment. In relation to 'Reversibility', it is noted that positive effects can be both reversible and irreversible depending upon the measure that is being implemented. However, there is no mention as to how this may align with decommissioning and whether or not the IEF should / could be retained with decommissioning activities.	potential for IEFs to be retained post-decommissioning. This will be further explored through the Decommissioning Programme, and the Applicant will consider the efficacy of retaining the measure for the benefits of IEF during the decommissioning activities and beyond the project's lifespan. This will largely be dependent on the measures implemented, and its duration will be assessed within the final NPP.
4	NTS	13 November 2025, Email Correspondence	Currently the EIA approach has a heavy focus on SPA features only, many of our sites closest to the windfarm development area have locally important seabird assemblages which also have the potential to be adversely impacted by developments. The number of birds that rely on these sites and surrounding waters are not insignificant. In addition, they have an important economic value to local tourism in the area. We support the inclusion of 'a desk-based review of existing publicly available literature will be undertaken to evaluate habitats and species, and establish what flora and fauna are likely to be present within or in close proximity to the project area'. We hope this will go beyond the inclusion of just designated features? As a nature positive strategy populations of local importance should be included alongside those of national importance. We would encourage Machair to reach out to NTS (and other landowners/organisations) to obtain data that may not be in the public domain to enhance this review process.	The EIA is a statutory process and, by design, focuses on features of designated sites such as Special Protection Areas (SPAs) and species predicted to be impacted by the development. However, the NPP is intended to go beyond these regulatory requirements. It takes a broader, proactive approach to biodiversity enhancement, considering locally important bird populations and other species of ecological and cultural significance, not just those formally designated or directly affected by the Project. The desk-based review will not be limited to designated features. It will aim to build a comprehensive understanding of habitats and species within and around the project area, including populations of local importance. To strengthen this process, the Applicant will seek to engage with key stakeholders, such as NatureScot and other landowners/organisations to access data that may not be publicly available. This collaboration will help ensure the review is as robust and inclusive as possible.
5	NTS	13 November 2025, Email Correspondence	With regards to the Market review, will this be focused on technologies for use within windfarm design construction only? If there is a broader scope for this, then focusing only on commercially available products may miss opportunities, especially in areas like seabird monitoring and research. Perhaps the review could also include expert elicitation or questionnaires sent to people with site specific knowledge? NTS staff would be	The market review will not be limited to windfarm design and construction features. It will cover all nature-inclusive design options currently available, as well as potential solutions that could be implemented beyond the Project's development areas. This includes opportunities for biodiversity enhancement through

I.D	Consultee	Date/Engagement Activity	Stakeholder Comment	Applicant Response
			happy to contribute ideas on ways of enhancing of biodiversity at our sites.	research funding, monitoring technologies, and other innovative approaches. The Applicant's aim is to identify both practical and forward-looking measures that can deliver meaningful nature-positive outcomes. However, it is important to note that the NPP can only operate within the limits of what is available at the time of detailed design, and any measures that are proposed must be feasible within the project's legal, financial, and engineering constraints. While the Applicant aims to be ambitious and proactive, practical implementation will depend on these factors. The Applicant acknowledges and appreciates NTS's offer to meet with the Project to share ideas around enhancing biodiversity. The Applicant welcomes continued engagement following consent applications submission.
6	NTS	13 November 2025, Email Correspondence	I would also like to take this opportunity to flag a concern that I have not seen addressed in any Scoping/Screening reports. The WDA is close to a lighthouse which is a concern as lighthouses can attract nocturnal seabirds, which could increase numbers heading into the windfarm area and increase risk of collisions. This would be of particular concern for species such as Puffin, Manx Shearwater and Storm Petrels, especially during periods of the year when fledgelings leave the colony. Could a potential technological solution to alleviate this potential issue fit within the Nature Positive Strategy?	The NPP is specifically focused on identifying and implementing enhancement opportunities that contribute to a net positive outcome for nature. Issues related to potential impacts, such as the attraction of nocturnal seabirds to lighting and associated collision risks, fall under mitigation measures, which are assessed and addressed through the EIA process (see **Chapter 5 EIA Methodology**, Section 1.9.2.8 for more details) rather than the NPP. While the Applicant appreciates the concern raised, and will ensure it is considered within the EIA (see **Chapter 11 Offshore Ornithology**), the NPP will remain focused on proactive biodiversity gains rather than impact mitigation.
Nature Positive Feedback				
7	Mull Community Council	06 November 2024, Microsoft Teams meeting	During a Project update meeting that MachairWind delivered to Community Council members, a question was raised on whether the project is seeking innovative ways to support fish spawning	The Applicant is committed to not only reducing its environmental impact, but to actively improving nature in the area, which is why the Nature Positive Plan has been developed for the Project. The

I.D	Consultee	Date/Engagement Activity	Stakeholder Comment	Applicant Response
			grounds, noting that community members had heard the foundations could potentially support this.	NPP explores nature inclusive design opportunities and nature enhancement actions to support local wildlife and habitats.
8	Mull and Iona Fishermen's Association (MIFA)	16 April 2026, Microsoft Teams meeting	In response to an overview of the Nature Positive Plan as part of a wider Project update meeting, MIFA members raised concern regarding the feasibility of native oyster restoration within the WDA, noting the exposure and conditions of the area. Some concern was also raised in relation to the proposed seaweed habitat blocks, with suggestions that the water depth and conditions of the area would not be favorable to these floating units. Members encouraged the Applicant to seek initiatives that could support lobster replenishment.	The Applicant welcomes feedback in relation to the proposed options within the NPP, as the aim is to implement initiatives that are viable, offer longevity and improve habitats. Due to the concerns raised in relation to the feasibility of native oyster restoration within the WDA, the NPP has been updated to reflect a focus on Targeted Species Restoration, specifically options that could support lobster replenishment.

4.2 POST APPLICATION ENGAGEMENT

30. Following submission of the WDA's consent applications, the Applicant will continue to adopt an open, transparent, and collaborative approach to stakeholder engagement as the NPP is further refined. Ongoing dialogue will be important to ensure that any biodiversity enhancement measures progressed are evidence-based, deliverable, and aligned with stakeholder expectations and regulatory requirements.

31. The Applicant recognises the value of cross-sector collaboration in supporting nature-positive outcomes and intends to explore opportunities for future partnerships with conservation organisations, academic institutions, marine users, and community groups. Such collaboration may include joint research initiatives, co-development of enhancement concepts, or support for targeted conservation efforts where these align with the Project's objectives and evidence indicates a clear ecological benefit.

32. While no formal partnerships or agreements are in place at this stage for nature positive actions, the Applicant remains committed to constructive engagement throughout the post-application period. This will help ensure that any offshore enhancement measures taken forward are informed by the latest scientific understanding and reflect wider regional conservation priorities.

5 BASELINE CONDITIONS

5.1 INTRODUCTION

33. A clear understanding of the existing ecological conditions within the WDA is essential for shaping meaningful and context-appropriate enhancement opportunities. For MachairWind, baseline information has been developed through the EIA process, drawing on a combination of desk-based research, reviews of designated sites, and extensive site-specific marine surveys. Together, these sources establish the distribution, condition, and ecological value of the habitats and species present within and around the WDA.

34. This evidence base provides the foundation for identifying which types of enhancement concepts may be suitable for further exploration. As the Project progresses, the baseline will continue to inform decision-making by ensuring that any potential nature-positive measures are grounded in an accurate understanding of local environmental conditions and tailored to the characteristics of the west coast marine environment.

5.2 HABITATS

35. This section summarises where baseline information for habitats can be found within the WDA's EIAR for each of the listed receptor groups. A summary table is provided (**Table 5.1**), indicating the relevant chapters that contain habitat baseline summaries, along with references to appendices where further detail is available, where applicable.

Table 5.1 MachairWind EIA Chapter and Appendices Reference for Baseline Habitat Assessment

Receptor	Cross reference
Marine water and sediment	See Section 7.8 in **Chapter 7 Marine Physical Environment** for a baseline and for more details see **Appendix 7.2** and **7.3.**
Benthic ecology	See Section 8.8 in **Chapter 8 Benthic Ecology** for a baseline and for more details see **Appendix 8.1, 8.2** and **8.3**
Ecosystem Assessment	See **Chapter 22 Inter-Related Effects and Ecosystem Assessment** for more details.

5.3 SPECIES

36. This section summarises where baseline information for species can be found within the WDA's EIAR for each of the listed receptor groups. A summary table is provided (**Table 5.2**), indicating the relevant chapters that contain species baseline summaries, along with references to appendices where further detail is available, where applicable.

Table 5.2 MachairWind EIA Chapter and Appendices Reference for Baseline Species Assessment

Receptor	Cross reference
Benthic ecology	See Section 8.8 in **Chapter 8 Benthic Ecology** for a baseline and for more details see **Appendix 8.1, 8.2** and **8.3**.
Fish ecology	See Section 9.8 in **Chapter 9 Fish (including Basking Shark) and Shellfish** and **Chapter 12 Commercial Fisheries** for a baseline. For more details see **Appendix 9.1**.
Marine Mammals	See Section 10.8 in **Chapter 10 Marine Mammals and Leatherback Turtle** for a baseline and for more details see **Appendix 10.2**.

Receptor	Cross reference
Ornithology	See Section 11.8 in **Chapter 11 Offshore Ornithology** for a baseline and for more details see **Appendix 11.2**.
All receptors	See **Chapter 22 Inter-Related Effects and Ecosystem Assessment** for more details.

5.4 NATURE NETWORKS

37. The WDA is situated within the wider west coast marine environment of Scotland, where offshore waters sit within a broader marine system that also includes nearshore and coastal environments. While the WDA does not overlap any designated conservation sites, it lies within a wider marine and coastal nature network that includes several internationally and nationally designated sites and associated PMFs.

38. Within the wider regional context, a key offshore designated site is the Sea of the Hebrides MPA. This MPA encompasses a large area of offshore waters to the north and west of Colonsay and is designated for mobile species including basking shark (*Cetorhinus maximus*) and minke whale (*Balaenoptera acutorostrata*), as well as oceanographic fronts associated with enhanced productivity. Species associated with the Sea of the Hebrides MPA are wide-ranging and not constrained by site boundaries and may therefore utilise offshore waters within the wider region, including areas beyond the designated site.

39. In addition, the Inner Hebrides and the Minches Special Area of Conservation (SAC) is designated for harbour porpoise (*Phocoena phocoena*) and extends across a broad area of west coast waters. Although this SAC does not overlap the WDA, it reflects the use of the wider regional marine environment by cetacean species whose movements may extend across offshore areas west of Colonsay as part of normal population behaviour.

40. The coastal and terrestrial elements of the wider nature network are also relevant in providing context for the offshore environment. The North Colonsay and Western Cliffs SPA is designated for its seabird assemblages. These species rely on marine waters beyond the immediate coastal zone for foraging, linking the SPA functionally to adjacent offshore areas without implying a specific dependency on the WDA. The wider nature networks will also include those in relation to the expected Offshore ECC and OnTDA which will be considered further when the NPP is updated.

41. This nature networks context helps inform the consideration of potential enhancement opportunities by ensuring they are assessed with reference to regional ecological processes and existing conservation priorities, while remaining proportionate and evidence-led.

6 ENHANCEMENT OPPORTUNITIES

6.1 INTRODUCTION

42. At this stage of the Project's development, the NPP identifies a range of potential enhancement options that may warrant further exploration as the design progresses. These options are not commitments but represent early concepts that could be feasible within the WDA and the wider marine environment. They reflect different levels of complexity, feasibility, and evidence requirements, and will continue to be reviewed as the Project evolves and additional environmental information becomes available.

43. To support the development of these concepts, a review was undertaken with the Scottish Association for Marine Science (SAMS) to assess the potential ecological benefits of currently available offshore enhancement options. This analysis draws on scientific and academic knowledge to evaluate the relevance and feasibility of different ideas in the context of habitats and species present in the WDA area. The findings from this work have helped to refine the options presented below and identify areas where further investigation may be appropriate.

44. In addition, the Applicant has considered insights from the CEMNID, a joint initiative between offshore developers and Scottish regulators which reviewed the suitability of nature-inclusive design (NID) measures for Scottish waters. While no specific measures are proposed at this stage, this work provides useful context on the types of NID-inspired concepts that may be environmentally relevant in Scottish marine systems. The Applicant's ongoing engagement with SAMS continues this evidence-led approach and will inform the future refinement of enhancement opportunities.

45. Although a growing body of research is beginning to explore these opportunities, the application of Nature Positive principles in offshore environments remains relatively novel, and there is currently limited evidence on the ecological outcomes of such measures at scale. As a result, many proposed interventions are still conceptual, with uncertainties around their long-term performance, interactions with existing marine processes, and suitability for different habitat types. This early stage of understanding reinforces the need for a cautious, evidence-led, and iterative approach, and as such the Applicant is currently considering a range of potential concepts, with the intention to review and refine them as monitoring data, scientific research, and Project-specific environmental information continue to develop.

6.2 WINDFARM DEVELOPMENT AREA ENHANCEMENT

6.2.1 Eco-friendly Concrete Mattresses

46. One of the initial offshore biodiversity enhancement concepts under consideration for the WDA is the potential use of eco-friendly cable protection reef mats, also known as nature-inclusive marine mattresses, in locations where traditional cable burial may not be feasible. At the WDA, the Applicant's primary aim is to bury the export, OSP link, and inter-array cables wherever practicable, and this remains the preferred approach for both engineering and environmental reasons. As such, mattresses would only be considered in discrete areas where burial cannot be achieved, and where protection is required to maintain cable stability and integrity.

47. These mats serve a dual function: providing essential protection for subsea power cables while offering opportunities for enhanced marine biodiversity. Unlike conventional concrete mattresses, which contribute little ecological value, eco-friendly variants use bio-enhancing materials and textured surfaces designed to encourage the colonisation of benthic marine species. Their three-dimensional form increases habitat complexity, creating microhabitats that support the settlement, sheltering, and feeding of marine flora and fauna, including algae, crustaceans, molluscs,

and fish. Increased structural complexity may also reduce the likelihood of dominance by a small number of opportunistic or invasive species, contributing to a more resilient local ecosystem.

6.2.2 Eco-Friendly Scour Protection

48. A second offshore biodiversity enhancement concept under consideration by the Applicant is the potential use of eco-friendly scour protection blocks designed to provide both foundation stability and ecological benefit. These eco-engineered concrete units can either be deployed as a full scour protection layer, where technically feasible, or incorporated into conventional rock armour to increase the ecological value of otherwise functional infrastructure.

49. Unlike traditional scour protection, which typically offers limited habitat complexity, reef-type concrete blocks incorporate rough, textured surfaces and internal cavities that emulate natural reef features. These structural characteristics can promote the settlement and sheltering of marine organisms such as crustaceans, molluscs, algae, and small fish. By creating a greater variety of microhabitats, these blocks have the potential to support feeding, refuge, and breeding opportunities, contributing to enhanced biodiversity around turbine foundations.

50. At this stage, the suitability of such measures remains subject to further assessment, including engineering feasibility, local hydrodynamic conditions, and ecological relevance within the WDA.

6.2.3 Habitat Pipes and Standalone Structures

51. A further offshore biodiversity enhancement concept under consideration is the potential deployment of standalone habitat structures, such as reef blocks, habitat pipes, or other “reef hotel” designs, intended to create artificial microhabitats and support marine biodiversity independently of turbine foundations or cable routes. These features are typically constructed from eco-friendly, low-carbon materials and incorporate textured surfaces, cavities, and varied geometries that mimic natural reef environments, encouraging colonisation by benthic fauna and providing sheltering or foraging opportunities for demersal fish species.

52. For MachairWind, the feasibility of this concept is highly dependent on the energetic hydrodynamic conditions characteristic of the WDA. The site experiences strong currents and dynamic seabed processes, and further assessment would be required to determine whether standalone structures could remain stable, function as intended, and avoid unintended environmental effects. Additional evidence on seabed mobility, survivability of placed structures, and long-term ecological effectiveness would therefore be essential before progressing this option.

53. It is also important to note that the placement of standalone habitat features on the seabed is likely to constitute a licensable activity under the Marine (Scotland) Act 2010, meaning any future consideration of such measures would need to be aligned with the Project’s consenting strategy. If the concept remains of interest as the design develops, further engagement with regulators and stakeholders, including fisheries representatives, would be undertaken to understand licensing implications, assess feasibility, and ensure any approach is ecologically appropriate.

6.2.4 Seaweed Habitat Blocks

54. Another enhancement concept being explored is the use of floating modular seaweed habitat blocks. These blocks are typically formed from eco-friendly, marine-grade materials and are engineered to support the growth and attachment of native macroalgae. Their textured surfaces and structural complexity provide settlement points for seaweed holdfasts while also offering microhabitats that can support invertebrates, juvenile fish, and other marine organisms associated with algal communities. These floating structures will be floating on the surface of the water and moored to the seabed. By facilitating the establishment of seaweed and associated species, such structures have the potential

to increase habitat diversity, contribute to primary productivity, and strengthen local food-web interactions.

55. This option needs further feasibility assessment at this stage as the placing of these blocks depends not only on the environmental factors, but also on navigational safety requirements. This could limit where additional seabed structures can be located within or near operational turbine arrays. Understanding how these blocks would behave and persist under the energetic conditions of the site will be essential before determining whether they could be used effectively and safely.

56. If this option remains of interest, further assessment would be required during later design stages, alongside consultation with regulators and maritime stakeholders, to establish whether modular seaweed blocks could be deployed responsibly and in a way that supports ecological benefit without introducing new risks.

6.2.5 Target Species Restoration

57. Targeted species restoration or replenishment is an enhancement concept under exploratory consideration, focused on the potential to support selected marine species where evidence indicates that environmental conditions may be suitable. This species-led approach is intended to remain flexible and could encompass species of ecological, conservation or local importance, including shellfish such as oysters or lobsters, as well as other benthic or demersal species.

58. Within an offshore windfarm context, targeted species restoration could potentially be delivered through a range of mechanisms depending on the species and objectives identified. These may include habitat-associated measures that support settlement or shelter, enhancement of reproductive potential through brood-stock support, or stock replenishment via juvenile release. Recent engagement with local fisheries representatives has highlighted lobster replenishment as a potential avenue of interest, subject to further assessment of site suitability and feasibility.

59. For MachairWind, targeted species restoration is considered a higher-complexity option that would require additional evidence-led assessment before being progressed. Suitability would depend on more detailed site-specific environmental conditions, including hydrodynamics, sediment characteristics and existing ecological communities, alongside practical considerations such as compatibility with offshore infrastructure, navigational safety, licensing requirements, and interactions with fishing activity. This will be pursued further as the Project develops.

6.2.6 Modified Foundation Design

60. The final concept currently being considered that may be explored as the WDA's design progresses is the use of modified foundation designs incorporating nature-inclusive design principles. This approach involves adjusting the geometry, surface texture, or layout of turbine foundations to introduce ecological features that could support marine biodiversity. Examples of such modifications include adding surface roughness or ridges to steel or concrete components, incorporating ledges or cavities, or designing peripheral skirts or platforms that create additional micro-habitat space for colonising species. These features aim to increase habitat heterogeneity and provide settlement or sheltering opportunities for benthic organisms and fish, enhancing ecological value without altering the primary engineering function of the foundations.

61. At this stage in the Project, the detailed foundation design has not yet been determined, and therefore the potential for incorporating NID features remains subject to future feasibility assessments. As the engineering design advances, opportunities to integrate nature-inclusive elements, where technically practical, environmentally appropriate, and aligned with wider Project objectives, will be reviewed. This concept will continue to be considered during later stages of the detailed design process, supported by evidence from baseline data, regulatory dialogue, and best practice guidance.

6.3 POTENTIAL ADDITIONAL ENHANCEMENT

62. In the event that none of the offshore enhancement options within the WDA prove feasible, whether for environmental, legal, technical, or financial reasons, the Applicant may explore the potential for off-site nature enhancement opportunities as part of its wider nature-positive ambition and to improve the nature networks surrounding the WDA. These opportunities would be developed in collaboration with local communities, environmental groups, and relevant stakeholders to ensure that any off-site measures are ecologically meaningful, locally supported, and aligned with regional priorities for nature recovery.

63. At this stage, no specific options have been identified, but the Applicant remains open to investigating off-site initiatives where evidence indicates they could deliver positive biodiversity outcomes and complement the overall development footprint.

7 REFINEMENT, DELIVERY AND MONITORING

7.1 REFINEMENT

64. As outlined in the preceding sections, the enhancement concepts identified within this NPP will remain subject to further refinement as the Project progresses into post-consent design stages. This refinement process will focus on developing a clearer understanding of the feasibility, scale, and practical requirements of any measures that may be taken forward. Detailed design work, updated environmental information, and continued engagement with regulators, stakeholders, and technical specialists will help determine which options, if any, are suitable for progression.

65. During this phase, potential measures will be reviewed using the assessment approach set out within the Applicant's NPS, ensuring that any enhancement taken forward is evidence-based, environmentally relevant, and aligned with the Project's broader objectives. The outcomes of this refinement process will be incorporated into future updates of the NPP, allowing the NPP to evolve alongside the Project and remain responsive to new information and best practice.

7.2 DELIVERY

66. Following the selection and refinement of any enhancement measures considered suitable for progression, a detailed Nature Enhancement Implementation and Monitoring Plan will be developed. This plan will set out the proposed delivery approach, including indicative actions, responsibilities, and timelines, as well as proportionate monitoring protocols to assess effectiveness and ensure alignment with best practice and regulatory expectations throughout the Project lifecycle.

67. The Applicant remains committed to continuing its work to assess the feasibility of offshore enhancement options and to considering opportunities for delivery where they are supported by evidence, technical practicality, and environmental relevance. Any future measures would be implemented in a manner that is compatible with engineering requirements, navigational safety, and the wider marine use of the area.

68. Delivery pathways will continue to be shaped through ongoing post-consent design development and engagement with regulators, stakeholders, and technical specialists. This flexible approach ensures that, if feasible measures are identified, they can be delivered responsibly, collaboratively, and in a way that supports the Project's broader ambition to work towards nature-positive outcomes.

7.3 MONITORING AND ADAPTIVE MANAGEMENT

69. Monitoring will be tailored to any enhancement measures that are taken forward for the Project and will be designed to generate information that is proportionate, meaningful, and aligned with the objectives of the NPP. Its purpose will be to provide feedback on effectiveness, support compliance where relevant, and inform adaptive decision-making. The results of monitoring will help determine whether measures are functioning as intended and will guide any adjustments needed to improve performance or address emerging ecological considerations. This adaptive approach will ensure the Project remains responsive to new information, evolving best practice, and changing environmental conditions.

70. The Nature Enhancement Implementation and Monitoring Plan will remain a dynamic document, updated as the Project progresses and as additional data, design developments, and stakeholder feedback become available. Progress and outcomes will be communicated to relevant stakeholders throughout the Project lifecycle, supporting transparency and enabling collaborative input as the enhancement strategy continues to develop.

8 CONCLUSIONS AND NEXT STEPS

71. The enhancement concepts identified in this NPP represent a structured set of opportunities that the Applicant will continue to investigate as part of its work toward delivering nature-positive outcomes. Based on the current understanding of engineering feasibility, cost benefit analysis, site conditions, and environmental relevance, the Applicant intends to progress these concepts according to their relative complexity and the level of further evidence required.

72. Low-complexity options, such as the use of eco-friendly cable protection mattresses, present the most immediate potential for integration, particularly in areas where cable burial is not possible. As the design develops, the Applicant will assess the feasibility of incorporating eco-friendly mattresses where appropriate and practicable, recognising their potential to provide biodiversity benefits while fulfilling essential engineering functions.

73. Moderate-complexity options, including habitat pipes, standalone reef structures, and modular seaweed habitat blocks, require additional assessment to understand their suitability within the energetic conditions of the WDA and to ensure compatibility with navigational, licensing, and operational constraints. The Applicant will continue to evaluate these options, supported by further data collection, technical appraisal, and engagement with the relevant regulators, marine users, and scientific experts to determine whether they could be deployed safely and effectively.

74. Higher-complexity, post-consent options, such as modified foundation designs incorporating nature-inclusive features or target species restoration will be revisited as the detailed design phase progresses and more refined engineering information becomes available. These options may offer longer-term opportunities for enhancement if feasibility, environmental suitability, and co-use considerations can be demonstrated. The Applicant will consider these measures during post-consent design development, supported by continued evidence-gathering and dialogue with regulators and stakeholders.

75. As the MachairWind design evolves, the NPP will be updated to reflect emerging opportunities, refined feasibility assessments, and any measures selected for further development. This phased and adaptive approach ensures the Project continues to move toward nature-positive outcomes while maintaining flexibility and alignment with technical, environmental, and regulatory requirements across the full Project footprint.

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