



Spiorad na Mara Offshore Wind Farm

Offshore Project

Offshore Planning Statement

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1 INTRODUCTION

1.1 SCHEME BACKGROUND

- 1.1.1.1 The Spiorad na Mara Offshore Wind Farm (the 'Project') is located off the northwest coast of the Isle of Lewis/*Eilean Leòdhais* in the Western Isles/*Na h-Eileanan Siar*, Scotland/*Alba*. The location of the Project is shown on **Figure 1.1: Project Location, Volume 1b**.
- 1.1.1.2 In response to the climate crisis, the Scottish Government has set an ambition to achieve net zero emissions by 2045. This, alongside the Scottish Government's original target to install offshore wind capacity of 11 gigawatts (GW) of energy by 2030, with the intention of providing a secure energy supply for the future while reducing Scotland's impact on the climate.
- 1.1.1.3 Under the Crown Estate Scotland's (CES) ScotWind leasing process, launched in June 2020, areas of seabed were released that were identified as suitable for renewable energy development. The ScotWind leasing round resulted in 17 developments being awarded Option Agreement Areas (OAA) in January 2022, a further three developments were awarded OAAs in April 2022 as part of the ScotWind clearing process. With the additional clearing process, the ScotWind leasing round surpassed the Scottish Government's target of 11 GWs with 27.6 GWs of potential energy supply from 20 developments.
- 1.1.1.4 As part of the first ScotWind leasing round, the Applicant was successfully awarded an OAA (N4 Plan Option) to develop an OWF located approximately 5 - 13 kilometres (km) off the northwest coast of the Isle of Lewis/*Eilean Leòdhais*. The Project location is shown on **Figure 3.1a: Project layout - Overview, Volume 1b** of the Environmental Impact Assessment Report (EIAR).
- 1.1.1.5 The Project will generate and transmit renewable electricity to the national electricity transmission network. The Applicant has a connection agreement with Scottish and Southern Electricity Networks (SSEN) for a connection to the grid network on mainland Scotland via SSEN's Alternating Current (AC) Substation and High-Voltage Direct Current (HVDC) Converter Station (referred to as the SSEN Lewis Hub). The Project has a connection agreement with SSEN for a connection to the grid network on mainland Scotland/*Alba* via SSEN's Lewis Hub. The Applicant is responsible for the construction and operation of the Onshore Transmission Works (OTW) Project connecting to the SSEN Lewis Hub as described in **Chapter 3: Project Description, Volume 1a** of the EIAR. These works will be subject of a separate consent application to Comhairle nan Eilean Siar (CnES) covering the OTW Project. The Applicant is seeking to deliver electricity to the National Electricity Transmission System (NETS) from the early 2030s.
- 1.1.1.6 The Applicant is submitting separate consent applications for the Offshore Project (component infrastructure seaward of Mean High-Water Springs (MHWS)), which is the focus of this Planning Statement and is supported by an Environmental Impact Assessment Report (EIAR). A further

consent application will be sought for the OTW Project components landward of Mean Low Water Springs (MLWS). The location for the Offshore Project is shown on **Figure 3.1a: Project layout - Overview, Volume 1a** of the EIAR).

1.1.1.7 A description of the Offshore Project is provided in Section 2 of this Offshore Planning Statement.

1.2 THE APPLICANT

1.2.1.1 Spiorad na Mara Ltd is the company that owns the Project (the Applicant). Northland Power Inc. (Northland) is the indirect owner of 75.5% of the share capital and Electricity Supply Board (ESB) indirectly owns the remaining 24.5%. The Joint Venture (JV) between Northland and ESB is formalised by way of a Shareholder Agreement.

1.2.1.2 Northland is a Canadian independent power producer focused on the development, construction, and operation of renewable energy projects. Founded in 1987, the company has a diverse portfolio, including offshore and onshore wind, solar, and thermal power plants. Northland is committed to advancing clean energy solutions and has established a strong presence in both North America and international markets, particularly in Europe and Asia. The company emphasises sustainability and reducing its carbon footprint while aiming to meet the growing demand for renewable energy. Through strategic investments and partnerships, Northland continues to expand its operations and contribute to the global transition to low-carbon energy.

1.2.1.3 ESB is a leading Irish energy company that operates in the generation, transmission, and distribution of electricity. Established in 1927, ESB plays a pivotal role in Ireland's energy sector, providing reliable power to homes, businesses, and industries. The company has a diverse energy mix, including renewable energy sources like wind and hydroelectric power, alongside conventional thermal plants. ESB is committed to sustainability and reducing carbon emissions, with a strategic focus on decarbonising its operations and increasing its renewable energy capacity with an expanding presence across Great Britain. The company also explores innovative solutions in energy storage, electric vehicle infrastructure, and smart grid technology, aiming to support the transition to a low-carbon energy future.

1.2.1.4 The Applicant has adopted a build-to-own approach from the start of the development, considers the long term when making decisions, and will work to strengthen the solid bonds already formed with communities and stakeholder representatives in Scotland's Western Isles and Northwest. As part of this approach, the Applicant will eventually transfer relevant assets to an Offshore Transmission Owner (OFTO). An OFTO is responsible for operating and maintaining the offshore electric power transmission infrastructure, ensuring the efficient delivery of electricity from the windfarm to the national electricity transmission network. This transfer process is managed through a competitive tender process overseen by Ofgem, which aims to partner wind farm developers with the most efficient and competitive transmission operators. This ensures that the transmission

infrastructure is maintained to high standards, ultimately benefiting both the generators and consumers.

1.3 CONSENT APPLICATIONS

1.3.1.1 The Applicant is submitting separate consent applications for the Offshore Project (seaward of MHWS) and for the OTW Project (landward of MLWS). This Planning Statement supports the Offshore Project application. Consenting requirements for the offshore application are outlined below.

1.3.2 CONSENT FOR OFFSHORE PROJECT

1.3.2.1 The Applicant is seeking:

- Section 36 (s.36) consent under the Electricity Act 1989, consent for the generating station and offshore transmission infrastructure;
- Section 36A (s.36A) declaration under the Electricity Act 1989 extinguishing public rights of navigation so far as they pass through the locations in the sea where the structures forming the Sporad na Mara Offshore Wind Farm are to be situated;
- Marine licences under the Marine (Scotland) Act 2010 (between 0 and 12 nm) with respect to prescribed marine licensable activities during the construction, operation and maintenance, and decommissioning of the Offshore Project.

1.3.2.2 The Scottish Ministers are the competent authority in respect of the necessary offshore consents and licences required for the construction, operation, and decommissioning stages of an OWF project. Within the Scottish Government, this application process is administered by the Marine Directorate - Licensing Operations Team (MD-LOT), on behalf of the Scottish Ministers.

1.3.2.3 **Plate 1-1** provides an illustration of the relevant consenting regimes and jurisdictions across the marine-terrestrial interface pertinent to the Project.

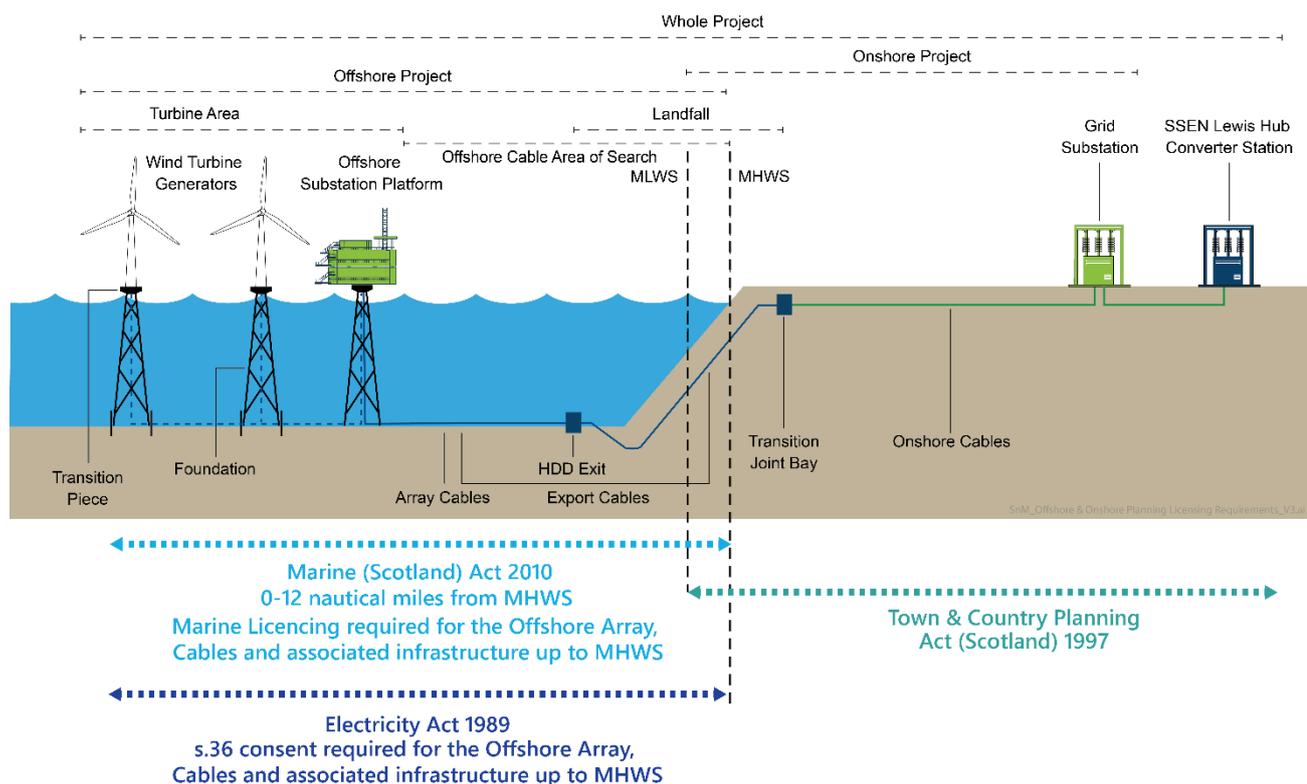


Plate 1-1 Offshore planning and licensing requirements

1.4 THE REQUIREMENT FOR AN ENVIRONMENTAL IMPACT ASSESSMENT

- 1.4.1.1 EIA is a process for identifying and assessing the likely significant environmental effects (positive and negative) of a proposed project to inform the decision-making process for relevant development and works consents to be granted.
- 1.4.1.2 The purpose of the EIA is to help the decision makers, statutory consultees, other stakeholders, and the public understand the predicted likely significant effects and the scope for avoiding, preventing, reducing, and if possible, offsetting them, before a decision is made as to whether to permit works.
- 1.4.1.3 The accompanying EIA supports the determination of the marine licence consents and s.36 consent for the Offshore Project. In particular, the EIAR provides an assessment of the likely significant effects associated with the Offshore Project during its construction, operation & maintenance (O&M), and decommissioning phases.

1.5 PURPOSE AND STRUCTURE OF PLANNING STATEMENT

- 1.5.1.1 This Planning Statement accompanies applications seeking consent for the Offshore Project (see paragraph 1.3.2.1).

- 1.5.1.2 The purpose of this Planning Statement is to consider the determining factors of the proposed Offshore Development, taking into consideration relevant marine and terrestrial planning policies, and energy policies set out in the National Planning Framework 4 (NPF4), United Kingdom (UK) Marine Policy Statement, Scotland’s National Marine Plan (NMP), Scotland’s Sectoral Marine Plan (SMP) for Offshore Wind Energy, the draft updated SMP (2025) and Scottish Government’s Update to the 2020 Offshore Wind Policy Statement (2026).
- 1.5.1.3 This Planning Statement will also set out relevant wider climate change and energy policy anchored into UK and Scottish legislation that will provide context to demonstrate the overall “needs case” and benefits for the proposed Offshore Development and wider Project.
- 1.5.1.4 This Planning Statement provides a summary of the conclusions found within the EIAR chapters and other supporting documents and uses this information to provide a detailed assessment of policy compliance against the relevant planning policies detailed in the above documents.
- 1.5.1.5 A separate Planning Statement will be provided for the proposed OTW, and as such, the onshore infrastructure and components are not included in this Planning Statement.
- 1.5.1.6 The Planning Statement is set out as follows:
- Section 1: Introduction;
 - Section 2: Project Description;
 - Section 3: Legislation and Policy Context;
 - Section 4: The Need for the Project;
 - Section 5: Policy Considerations;
 - Section 6: Conclusion and Planning Balance.

1.6 SCOTTISH AND UK GOVERNMENT TARGETS

- 1.6.1.1 The Offshore Project has been developed to directly support both Scottish and UK Government policy and objective for decarbonisation, energy security and the accelerated deployment of offshore renewable energy. Scotland has set some of the world’s most ambitious statutory climate targets, including reaching net-zero greenhouse gas emissions by 2045, underpinned by a clear commitment to expand offshore wind as a central component of the transition to a low-carbon energy system. The Scottish Government’s Offshore Wind Policy Statement confirms that offshore wind will play a “vital part” in meeting these commitments, recognising the sector’s role in delivery large-scale renewable electricity and supporting a transition to net zero. In January 2026, the Scottish Government published the Update to the 2020 Offshore Wind Policy Statement: Scotland’s Offshore Wind Ambition which reset its offshore wind ambition to up to 40 gigawatts (GW) of new capacity by 2040, further strengthening its commitment to offshore wind. Spiorad na Mara Offshore Wind Farm is identified as one of the Lease Awarded schemes in the pipeline that is reflected in the increased ambition. At the UK level, national policy similarly identifies offshore



wind as an essential technology for achieving a decarbonised power system by 2035 and net zero by 2050, with the UK Government setting an ambition to deploy up to 50 GW of offshore wind by 2030. By contributing significant new clean energy capacity and supporting the growth of the offshore wind supply chain, the Offshore Project aligns with, and is an important contribution to delivering, UK and Scottish policy priorities.

2 PROJECT DESCRIPTION

2.1 OFFSHORE PROJECT BOUNDARY AND LAYOUT CONSIDERATIONS

2.1.1.1 The Offshore Project consists of 3 areas. The Array Area is defined as the total area within which the offshore WTGs, associated foundations, Array Cables and the Offshore Substation Platform (OSP) (if required) will be located. The Turbine Area (refined from the original Array Area presented in the Scoping Report (Spiorad na Mara, 2023)), is a reduced area within the Array Area, within which all surface piercing infrastructure will be located. The Offshore Cable Area of Search (OCAS) will accommodate the Array Cables to Landfall or the Export Cables along with the Horizontal Directional Drilling (HDD) Exit Pit Area.

2.1.2 ARRAY AREA AND TURBINE ARRAY

2.1.2.1 The Offshore Project includes the Array Area, which is located approximately 5-13 km from the coast and has an area of 161 km². Water depths across the Turbine Area generally range from 37-67 m, except for a localised depression in the southwest corner of the Array Area where depths reach approximately 72 m.

2.1.2.2 Within the Array Area, the Turbine Area has been defined through multidisciplinary workshops, which considered engineering and environmental factors along with stakeholder feedback. All surface piercing infrastructure, including WSGs and OSP (if required), will be located in the Turbine Area to minimise environmental and human impacts.

2.1.3 WIND TURBINE GENERATOR LAYOUT

2.1.3.1 Within the Turbine Area, the determination of the WTG layout is an iterative process of balancing key safety, technical, commercial and environmental sensitivities and where refinements are made throughout the development process. At this stage, taking into account known constraints and opportunities, indicative layouts used for the EIAR are presented in **Figures 3.2a and 3.2b, Chapter 3: Project Description - Figures, Volume 1b**.

2.1.3.2 Refinement of the layout will continue post-consent, and turbine locations will evolve to take account of ground conditions, technical considerations and stakeholder engagement. The final layout will be developed and approved prior to the commencement of construction.

2.1.4 OFFSHORE CABLE AREA OF SEARCH

2.1.4.1 The OCAS is approximately 47 km² which covers the area where Offshore Cables will be laid in order to connect the OSP (Scenario 1) or WTGs (Scenario 2) to the shore (see **Figure 3.2a, Volume 1b** and **Figure 3.2b, Volume 1b** of the EIAR). Whilst part of the offshore cabling will be located

within the Array Area in order to connect to the WTGs or OSP (if required), these cables will ultimately be laid within the OCAS between the edge of the Array Area and HDD Exit Pits.

2.1.4.2 Maximum design parameters for the Offshore Project Boundary are presented in **Table 2-1**.

Table 2-1: Maximum Design parameters for Offshore Project Boundary

Parameter	Measurement
Offshore Project Boundary Area	208 km ²
Array Area	161 km ²
Turbine Area	140 km ²
OCAS	47 km ²
Distance from shore to Array Area	5 – 13 km
Distance from shore to Turbine Area	6 – 13 km
Water depth range in Array Area / Turbine Area	32 to 72 m (MSL)

2.2 PROJECT DESIGN ENVELOPE

2.2.1.1 The Project Design Envelope (PDE) follows the principles of the Rochdale Envelope approach, which allows for the definition of appropriate design parameters to inform assessment where details of a proposal have not yet been confirmed, such as the tip height or rotor diameter of a WTG. The Rochdale Envelope approach is discussed further in **Chapter 5, Volume 1a** of the EIAR. Following this approach, the PDE maintains flexibility for the Offshore Project to accommodate:

- Further refinement during detailed design;
- Opportunities afforded by technological advancements;
- Uncertainties in the development process.

2.2.1.2 The Applicant has defined a range of design parameters relating to the location, design and size of the Offshore Project, taking into account the guidance provided by Scottish Government (Scottish Government, 2022a). This provides the basis for the Maximum Design Scenario (MDS) presented within the technical chapters of the EIAR (**Chapter 6, Volume 2a to Chapter 22, Volume 2a**).

2.2.1.3 The approach to assessment including the use of a PDE and MDSs is included in **Chapter 5, Volume 1a** of the EIAR. Each technical assessment presented within **Chapter 6, Volume 2a to Chapter 22, Volume 2a** of the EIAR defines and justifies the MDS appropriate for that assessment. For example, in the case of **Chapter 14: Marine and Nearshore Ornithology, Volume 2a** of the EIAR, the MDS for collision risk is based on the maximum number of the smaller turbines as this creates the greatest risk of collision. Conversely, in the case of **Chapter 18: Seascape, Landscape and Visual Impact Assessment, Volume 2a** of the EIAR, the maximum number of the larger turbine would represent the MDS because the scale and extent across the Zone of Theoretical

Visibility (ZTV) of the maximum number of larger turbines would be likely to give rise to greater effects than a greater number of smaller turbines given that they occupy the same geographical extent.

- 2.2.1.4 Where the MDS is used to identify and assess impacts on a given receptor, it can be assumed that any Offshore Project parameters that are smaller than or equal to the parameter used for assessment will result in environmental effects that are less than or equal to those assessed.
- 2.2.1.5 As the PDE forms the basis for the MDS, it is used to determine the extent to which the Offshore Project could result in impacts on the environment. Therefore, the final design of the Offshore Project will be required to fall within this envelope. This will be controlled through appropriate conditions that will be attached to the s.36 Consent and Marine Licences for the Offshore Project, ensuring that any consent granted is within defined parameters and has been appropriately assessed and examined.
- 2.2.1.6 The PDE has been developed based on the industry knowledge and experience of the Applicant and its advisers along with site specific survey information relating to the ground and environmental conditions of the Lease Area. It has been informed by multidisciplinary teams to develop the Offshore Project design iteratively, to appropriately consider the sensitive environmental and social context of its setting.

2.3 DESIGN EVOLUTION

- 2.3.1.1 Since the submission of the Scoping Report (Spiorad na Mara, 2023), refinements to the PDE have been made as new environmental and engineering data have become available and in response to consultation and stakeholder feedback, as detailed in **Appendix 5.2: Response to EIA Scoping Opinion, Volume 1a, Appendix 5.4: Stakeholder Consultation and Engagement, Volume 1a** and specific responses relevant to each topic included in each topic chapter: **Chapter 6: Socio-Economics, Volume 2a to Chapter 22: Offshore Human Health, Volume 2a**. Further development and refinement of the PDE ensures that the PDE reflects both regulatory requirements and best practice in EIA.
- 2.3.1.2 This design evolution process aims to ensure that potential challenges and risks associated with the Offshore Project are addressed. Refinements have been made to various elements of the PDE as detailed below through a series of design reviews following the scoping stage. Stakeholder consultation played a critical role in shaping the scheme, with feedback from MD-LOT, NatureScot, Western Isles Council/Comhairle nan Eilean Siar (CnES), Historic Environment Scotland, and local Community Councils leading to further design reviews.
- 2.3.1.3 The objectives integrated within the design reviews allowed for the design to consider and balance technical and engineering feasibility, environmental sensitivities, economic viability, and stakeholder priorities. Therefore, the project description presented in the EIAR differs from the

description presented at the scoping stage, as outlined in the following paragraphs. **Chapter 4: Consideration of Alternatives, Volume 1a** provides further detail on the various design alternatives considered by the Applicant and the resultant PDE.

2.3.2 ARRAY AREA REFINEMENT

2.3.2.1 Consultation with stakeholders, including MD-LOT, NatureScot, CnES, Historic Environment Scotland, and local Community Councils, highlighted the visual impact arising from the proximity of the proposed WTGs to the coastline of the Isle of Lewis (5-13km) and the South Lewis, Harris and North Uist National Scenic Area (NSA). NatureScot advised that the NSA is particularly susceptible to this form of development and emphasised that design iteration should consider the Special Landscape Qualities (SLQs), particularly the strong wild character.

2.3.2.2 In response, the Project undertook several design iterations, applying design principles to minimise effects on sensitive receptors. These included:

- Maximising setback distances to 11km from the NSA and 6km from the coastline;
- Reducing turbine height and scale;
- Considering development only in selected parts of the original Array Area;
- Optimising turbine layout to limit visual prominence and cumulative visual effects.

2.3.2.3 Further refinements were made following community feedback received during Phase 1 Public Consultation in 2024, which also highlighted visual impact as an important consideration. A Turbine Area was subsequently defined, increasing separation from the coastline and NSA by removing the southwest portion of the original Array Area. This reduced the lateral spread of the scheme, increased open-sea separation, and decreased the spatial scale and visibility of proposed infrastructure from the NSA and the "regionally distinctive" coast between Shawbost and Carloway.

2.3.2.4 In addition to landscape and visual considerations, the refined Turbine Area reflects technical, environmental, and engineering constraints, including:

- Marine Ornithology: Avoidance of seabird hot spots identified through 24 months of aerial survey data;
- Fish ecology: increased distance from migratory pathways associated with the Langavat (Special Area of Conservation) SAC to reduce potential underwater noise impacts on Atlantic salmon;
- Navigation: Increased sea room vessels operating in nearshore waters and entering/exiting Loch Roag;
- Noise: Reduced maximum turbine numbers, lowering potential underwater and airborne noise impacts;
- Water Depth: Variation of water depths across the Array Area with the deeper areas that could pose technical delivery challenges considered for removal from Array Area.

2.3.2.5 As secured through Commitment M036, (see **Chapter 24: Summary of Offshore Mitigation / Statement of Offshore EIA Commitments, Volume 2a** of the EIAR) only surface piercing infrastructure (WTGs and any required OSP) will be located within the refined Turbine Area. This design evolution demonstrably reduces predicted effects on the NSA, coastline SLQs, sensitive wildlife receptors, and local navigation, while balancing environmental protection with technical feasibility and the Project's generation objectives.

2.3.3 WIND TURBINE GENERATORS

2.3.3.1 Following the EIA Scoping Report (2023), which defined initial maximum parameters of up to 66 WTGs with blade tip heights of 380m above mean sea level, the Applicant refined turbine parameters in response to statutory feedback and local community views. Two bounding design scenarios were established, one based on up to 66 smaller WTGs and another on up to 48 larger WTGs, reflecting expected availability at procurement.

2.3.3.2 Phase 1 Public Consultation feedback highlighted the importance of minimising impacts. In response, key WTG parameters were reduced across both turbine size scenarios. These reductions include:

- A decrease in turbine numbers (from 66 to 60 smaller models and from 48 to 44 for larger models);
- Reduced maximum rotor diameters, blade tip heights, and blade chord widths;
- Reduced maximum hub height for the larger WTG type.

2.3.3.3 The minimum blade-tip clearance was also increased to 30m above mean sea level. This is considered feasible based on engineering risk, navigational safety, seabird collision risk, and the availability of suitable heavy-lift installation vessels.

2.3.3.4 The refinements also reflect technical considerations e.g. responding to water depth and ground-condition constraints and ensuring installation and operational feasibility. Further details are provided in Section 2.5.2 of this Statement.

2.3.4 TURBINE LAYOUT

2.3.4.1 The current WTG and Offshore Cable layouts are indicative to allow a maximum design scenario to be developed for the purposes of the EIAR assessment. The final layout will be determined during detailed design as described above. During the design process, consideration was given to WTG layout design concepts for assessments in the EIAR, including a 'fanned' layout, with WTG rows in a fanned arrangement with increasing angles towards the north from the first column at the south of the Array Area and a 'grid' layout, with WTGs in rows arranged perpendicular to the coast on the same angle from southern to northern most rows. The 'grid' layout optimises the available space and thus constitutes the highest density layout of WTGs.

2.3.4.2 In consultation with NatureScot, in terms of seascape, landscape, and visual effects, it was agreed that the 'fanned' layout generally had a more organic/less regimented character, which related better to its orientation to the receiving landscape/seascape, however, it was noted that it was difficult to define what is worst-case in landscape and visual terms. A 'grid' layout has been selected for assessment in the EIAR as a worst case for potential effects associated with the seascape, landscape and visual as this presents a less organic layout to the coastline.

2.3.5 FOUNDATION TYPES

2.3.5.1 The foundation options for the Offshore Project have been developed through a structured, feasibility-led process that considered engineering, environmental, and site-specific constraints. Initial screening (Level 1) assessed a wide range of concepts against qualitative criteria, including metocean suitability, ground conditions, fabrication and installation requirements, logistics, and environmental considerations, to eliminate options unsuitable for the Project's challenging seabed and water-depth conditions. A further semi-quantitative Level 2 assessment examined the remaining foundation types under both shallow and deep rockhead scenarios. This process identified jacket foundations with driven (using percussive piling) or drilled-and-grouted pin piles as the most appropriate for the majority of the site, with split-jacket and hybrid Gravity Base Systems (GBS) concepts retained as contingency solutions for specific installation or supply chain risks.

2.3.5.2 Following Phase 1 Public Consultation, initial underwater noise (UWN) modelling was undertaken to understand the potential Zone of Influence (Zoi) associated with percussive piling, particularly in relation to sensitive receptors such as migratory Atlantic salmon. This modelling informed a refinement of the foundation installation approach to incorporate both percussive piling and drill-and-grout techniques, and to reduce the spatial extent within the Turbine Area where percussive piling can occur, moving activity away from the mouth of Loch Roag area to minimise underwater noise impacts.

2.3.5.3 Further UWN modelling and consultation with key stakeholders (MD-LOT, NatureScot, MD-SEDD) led to additional refinements and the development of a package of embedded mitigation measures to limit underwater noise effects. These measures, along with the finalised piling approach are described in detail within **Chapter 3, Volume 1a** of the EIAR.

2.3.6 LANDFALL, CABLE AND SUBSTATION

2.3.6.1 Landfall and offshore cable routes were selected using multi-stage Red-Amber-Green (RAG) assessments, with the preferred options minimising engineering, environmental, and social concerns. Substation choices were driven by ground conditions and installation feasibility, with jacket foundations and two substation scenarios retained for flexibility.

- 2.3.6.2 The EIAR considers two electricity transmission scenarios for delivery of either an OSP or a Landfall Substation. Only one of these two scenarios will be delivered. It is necessary to retain these options to allow further ground investigation and detailed design to be undertaken to ensure optimal engineering and electrical design. The Landfall Substation option would limit the engineering work required offshore. However, the OSP would reduce the number of Offshore Cables required at Landfall to two, as opposed to 12 with a Landfall Substation which results in a higher level of complexity and technical risk associated with the construction works.
- 2.3.6.3 The Landfall cable and substation include for the installation of Export Cables via HDD from the HDD Exit Pits to the onshore transition joint bays (TJB). It also includes the Landfall Substation and associated construction works. The identification of the proposed Landfall location was undertaken through an iterative desktop study that included an initial screening exercise of nine options followed by three RAG constraints analyses based on a detailed review of onshore and offshore constraints along the west coast of Isle of Lewis on identified Areas of Search (AoS). Consultation with stakeholders was also undertaken to inform this process. No other areas (outside of the west coast) on the Isle of Lewis were considered due to technical and economic feasibility.
- 2.3.6.4 The AoS for the offshore cables reduced following the initial selection of the landfall location. The OCAS was then designed for the location of the Offshore Cables that connect the WTGs or OSP to Landfall. The Applicant undertook a technical feasibility analysis to understand how the OCAS could be refined to minimise the impact on commercial fisheries. Following this analysis a smaller OCAS was identified encompassing only the most northern part of the original OCAS.

2.4 PROJECT DESCRIPTION

- 2.4.1.1 The key components of the Project are illustrated in Figure 2-1. The Offshore Project consists of the infrastructure located within the Offshore Project Boundary (this includes the Array Area, OCAS and offshore elements of the Landfall below MHWS).
- 2.4.1.2 The Onshore Transmission Works (OTW) Project consists of onshore infrastructure located within the Onshore Transmission Works Boundary (OTWB) (this includes the onshore elements of the Landfall Area above MHWS, Landfall Substation, Grid Substation and the Onshore Cable Corridor). The OTWB runs broadly south from the Landfall to the Grid Substation approximately 3 km southwest of Stornoway/Steòrnabhagh, see **Figure 3.1a: Project layout - Overview, Volume 1b** of the EIAR.
- 2.4.1.3 Landfall is the interface between the Offshore Project and the OTW Project, and the offshore cable (either Array Cable to Landfall or Export Cable) comes ashore at a coastal cliff at Barvas/*Barabhias* via HDD (see **Figure 3.1c: Landfall, Volume 1b** of the EIAR).
- 2.4.1.4 The infrastructure included in the s.36 and Marine Licence applications for the Offshore Project includes:

- WTGs;
- WTG Foundations and associated protection;
- OSP and associated foundation and protection;
- Either Array Cables to Landfall or Array Cables and Export Cables and associated cable protection;
- HDD Exit Pits below MHWS (located in the Exit Pit Area);
- Other associated infrastructure such as navigation markers.

2.4.1.5 The Applicant has retained optionality around WTGs, foundations and electrical transmission resulting in a range of options and scenarios, meaning that not all components would be constructed in every scenario. The optionality that has been retained is set out below.

2.4.2 WIND TURBINE GENERATOR OPTIONALITY

2.4.2.1 The Offshore Project considers a design envelope derived from a smallest and largest turbine type. The offshore wind industry continues to evolve in an effort to improve safety, efficiency and to reduce costs. The Applicant requires flexibility in respect of WTG choice to ensure that they are not precluded from taking advantage of new, safer or more cost-effective technology. To reflect this, the PDE presents 2 bounding scenarios that provide key maximum design parameters for assessment. Intermediate configurations (such as 52 WTGs with a blade tip height between 293.8m and 338.4m where the total rotor swept area falls within the defined swept area parameter) may also be deployed, on the basis that they fall within these bounding scenarios.

2.4.2.2 The WTG parameters include:

- Up to 44 of the largest offshore WTG type, with a maximum blade tip height of 338.4m above mean sea level (MSL), with a minimum 30m blade clearance above MSL, and associated foundations;
- Up to 60 of the smallest WTG type, with a maximum blade tip height of 293.8m above MSL, with a minimum blade clearance above MSL, and associated foundations.

2.4.3 FOUNDATION TYPES

2.4.3.1 As with WTG technology, foundation design continues to evolve, and the selection of a final foundation type and design is strongly influenced by ground conditions. The Applicant requires flexibility to select the most suitable foundation technology at the time of construction. This decision will be informed by further post-consent studies and supply chain engagement.

2.4.3.2 A range of foundation types and combinations of installation methods have been retained within the design envelope. The following foundation types remain within the envelope:

- Multi leg jacket with pin piles installed by:
 - Drilling and grouting pin piles; or

- Driving pin piles.
- Hybrid multi leg jacket with gravity base.

2.4.3.3 The foundation options are described in further detail in Section 3.4.9 and represent the basis for the MDS. For example, jackets with up to 4 legs are included meaning that jackets with 3 legs could be deployed.

2.4.4 ENERGY TRANSMISSION INFRASTRUCTURE OPTIONALITY

2.4.4.1 The electrical design of the wind farm transmission system requires 2 High Voltage Alternating Current (HVAC) substations. These substations are required to transform and maintain the voltage of the electricity from the WTGs so that it is suitable for onward transmission and fulfil a critical role in the safe transmission of electricity.

2.4.4.2 A Grid Substation that forms part of the OTW Project is proposed on the east side of Lewis/*Eilean Leòdhais* to connect the Project to the planned Lewis Hub Converter Station. On the west side of Lewis/*Eilean Leòdhais* however, there are currently 2 options retained by the Applicant: either an OSP (which will form part of the Offshore project) or a Landfall Substation (forming part of the OTW) with associated cabling arrangements. These options are described below and shown on **Figure 3.1a, Volume 1b** and **Figure 3.2a: Indicative Turbine layout Option 1, Volume 1b** of the EIAR.

2.4.4.3 It is necessary to retain these options to allow further ground investigation and detailed design to be undertaken to ensure an optimal engineering and electrical design. A Landfall Substation would limit the work required offshore, improving accessibility during construction, O&M, and decommissioning. However, the OSP would reduce the number of Offshore Cables and avoid complexity and technical risk associated with the construction works. The scenarios are as follows:

Scenario 1: WTGs connected to an OSP and then to Landfall

2.4.4.4 In Scenario 1, the substation on the west coast of Lewis/*Eilean Leòdhais* will be located offshore within the Turbine Area, referred to as the OSP. The key components of this option are:

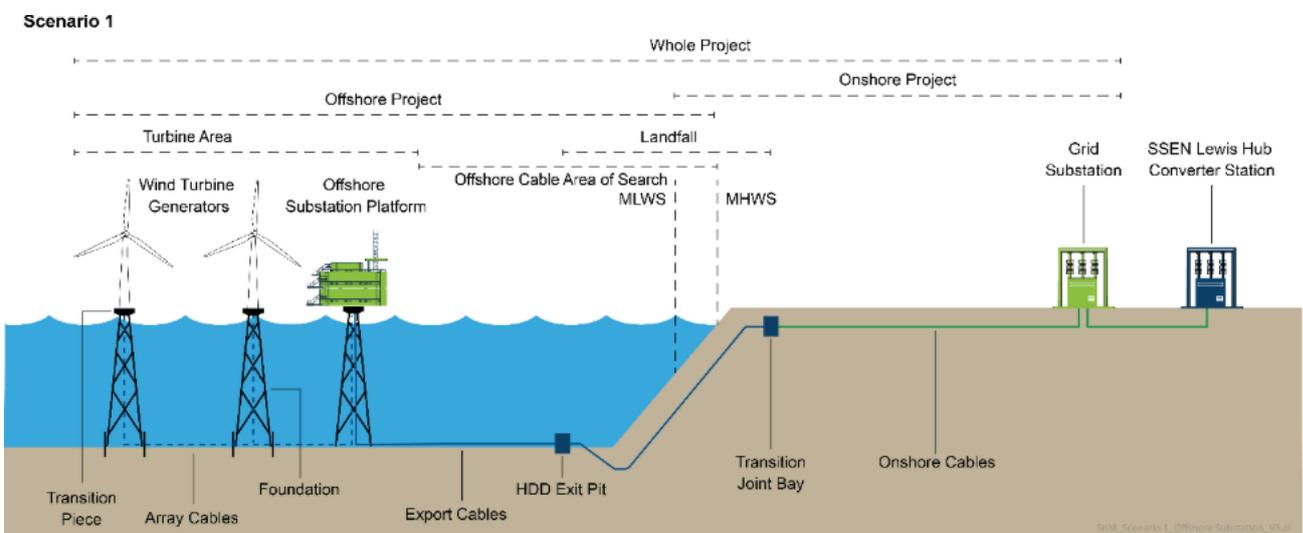
- Array Cables will be installed in a string circuit configuration, connecting multiple WTGs together. These cables (referred to as 'Array Cables') will transmit the generated power from each WTG to the OSP located within the Turbine Area.
- From the OSP, Export Cables, that are designed to transmit higher voltages over longer distances, will transmit the collected power to the Landfall.
- At the Landfall, the Export Cables will connect to the Onshore Cables at the transition joint bays (TJBs), which are underground concrete chambers, used to house the interface joint between the Export Cables and the Onshore Cables. The Export Cables will be connected to the TJB at Landfall using a trenchless solution (HDD) from the HDD exit pit.

- From the TJBs, the buried Onshore Cables will connect to the Grid Substation on the east of the Isle of Lewis/*Eilean Leòdhais*. The Grid Substation will then connect to the grid connection point at the Lewis Hub Converter Substation.

Scenario 2: WTGs connected directly to an Onshore Landfall Substation

2.4.4.5 In Scenario 2, the substation on the west coast of Lewis/*Eilean Leòdhais* will be located onshore northeast of Barvas/*Barabhas*, referred to as the Onshore Landfall Substation. The key components of this option are:

- Array Cables will be installed in several string circuit configurations, connecting multiple WTGs together (referred to as 'Array Cables'). The final WTG in each chain will transmit the generated power from the WTG directly to the Landfall (referred to as 'Array Cables to Landfall').
- The Array Cables to Landfall will connect to the Onshore Cables at the TJBs.
- From the TJBs, the Onshore Cables will connect to the Landfall Substation on the west of the Isle of Lewis/*Eilean Leòdhais*.
- The collected power will be transmitted from the Landfall Substation to the Grid Substation via buried Onshore Cables.
- The Grid Substation will then connect to the grid connection point at the Lewis Hub Converter Substation.



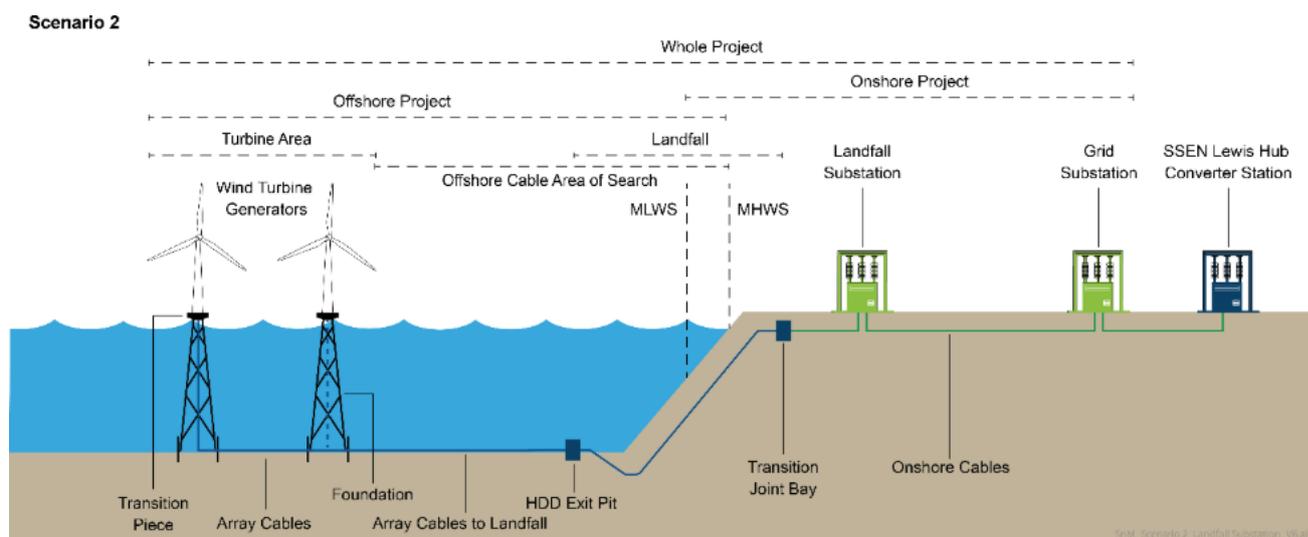


Plate 2-1 Key components of the Project

2.4.5 EMBEDDED MITIGATION

2.4.5.1 Mitigation measures are strategies designed to minimise potential environmental effects from a project and can occur at multiple stages across a project's lifespan. Embedded mitigation measures are those measures that are embedded into the design of the project to prevent or reduce negative impacts. They are embedded into the project design so are considered as part of the Offshore Project within the topic assessments of this EIA.

2.4.5.2 These embedded mitigation measures have evolved over the design development process to address emerging technical and environmental challenges and in response to consultation. All mitigation measures, including management plans, are described in each technical chapter of the EIA (**Chapters 6, Volume 2a to Chapter 22, Volume 2a**). A complete list of embedded mitigation measures for the Offshore Project is available in **Chapter 25: Summary of Offshore Mitigation / Statement of Offshore EIA Commitments, Volume 2a** of the EIA. All activities described within this chapter will be undertaken adhering to these embedded mitigation measures.

2.4.6 CONSTRUCTION PROGRAMME AND SEQUENCING

2.4.6.1 An indicative construction programme for the Offshore Project is presented in **Table 2-1**. The programme illustrates the anticipated duration of the major construction/installation elements. The anticipated worst-case total construction duration of 5 years during which construction works for offshore and onshore elements would overlap.

2.4.6.2 It is anticipated that offshore construction works could commence in 2028/29. This approach ensures that construction activities are aligned with favourable weather conditions and minimises disruptions to the local marine environment. The final construction schedule will be determined by

the Applicant based on a range of commercial and technical factors. An overview of the construction sequencing is outlined for the offshore works in Section 2.5 and the onshore works in Section 2.5.2.

- 2.4.6.3 Commissioning is the process during the construction stage of assuring that all systems and components of the Project are designed, installed, tested according to the requirements to enable safe operation. This will enable the Project to be connected to the national electricity transmission network and handed over to the team responsible for its operation.

2.5 OFFSHORE PROJECT

2.5.1.1 An indication of offshore construction sequencing is provided below. Note that some of these activities would run in parallel and the precise timings are yet to be defined.

- Pre-construction surveys and site investigations, as required;
- Site preparation, foundation and substructure installation;
- OSP installation (if required);
- Array and Export Cable installation – landfall and offshore;
- WTG installation/commissioning.

2.5.1.2 Detailed sequencing of Landfall works will be undertaken following detailed design; however, it is expected to follow the approach set out below, noting that some onshore and offshore activities may be undertaken simultaneously:

- Onshore and Offshore site preparation;
- Construction of site access and Landfall Temporary Construction Compound (TCC);
- Construction of TJBs;
- Preparation of HDD exit pits;
- Onshore and Offshore HDD operations;
- Offshore Cable pull-in through duct;
- Capping and burial of HDD duct end;
- Installation of and jointing in TJB;
- Backfill and reinstatement works.

2.5.1.3 A 5-year construction period is anticipated for the Offshore Project, with work programmed between April and October to utilize optimal weather conditions. Construction working hours expected to be up to 24 hours, 7 days a week. A provisional programme is provided in **Table 2-1**.

Table 2-1 Provisional Offshore Construction Programme

Activity	Year 1				Year 2				Year 3				Year 4				Year 5			
	Q1	Q2	Q3	Q4																
Site Preparation		■	■			■	■			■	■									
Foundation Installation						■	■			■	■									
WTG and OSP (if required) Installation											■			■	■			■	■	
Offshore Cable Installation										■	■			■	■					
Landfall HDD installation							■	■	■	■	■	■	■	■	■					
OTW Project Construction	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■



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2.5.2 OTW PROJECT

- 2.5.2.1 As the design of the OTW is not as advanced as the Offshore Project it is not possible to provide a detailed construction programme at this stage.
- 2.5.2.2 The total anticipated construction period for each onshore substation is around 26 months, and the total expected duration of construction works relating to the cable route is 2-3 years.

2.5.3 OPERATION AND MAINTENANCE

- 2.5.3.1 The overall O&M strategy will be finalised once the Offshore Project design is fixed and a location for the onshore O&M base has been confirmed. Options for the O&M base are currently being considered, and work has been undertaken to assess Scottish port capabilities to meet the Offshore Project's requirements, although Stornoway Port is the preferred location. This section, therefore, outlines the reasonably foreseeable schedule and unscheduled maintenance activities for the Project (see **Table 2-2**).
- 2.5.3.2 All offshore infrastructure, including WTGs, foundations, cables and any required OSP and their ancillary infrastructure will be included in monitoring and maintenance programmes. O&M activities may be required at any time during the lifecycle of the Offshore Project.
- 2.5.3.3 Vessels will be required for the ongoing O&M of the Offshore Project. The PDE for vessel requirements are outlined in **Table 2-3**.

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Table 2-2 Project Design Envelope for Operation and Maintenance activities

Component	Parameter	Description	Expected Frequency	
			Scenario 1 (OSP)	Scenario 2 (Onshore Landfall Substation)
Foundations (WTGs)	Scheduled Inspections	Inspections of foundations, including Transition Piece and ancillary structures (e.g. J-tubes), above and below sea level.	Up to 35 main scheduled inspection and maintenance visits per turbine across the Offshore Project's lifetime. To include topside and subsea inspection.	
	Site Investigation surveys	Survey of seabed and assets.	As dictated by seabed mobility risks and design of foundations. These can be undertaken every 1-3 years. There may be extra surveys to support jack-up deployment or cable health monitoring.	
	Repairs and replacements of navigational equipment	Repairs and replacements of electrical equipment such as lighting, fog horns, navigation lights and transponders.	As required up to 10 per year per turbine.	
	Removal of marine growth	Removal of marine growth from foundations, transition pieces, or access ladders.	As required annually per turbine.	
	Replacement of corrosion protection anodes	Remove and replace anodes required for corrosion protection.	As required every 5 years.	
	Painting	Application of paint or other coatings to protect the foundations from corrosion (internal/external), including surface preparation.	As required annually per turbine.	

Component	Parameter	Description	Expected Frequency	
			Scenario 1 (OSP)	Scenario 2 (Onshore Landfall Substation)
	Replacement of access ladders and boat landings	Removal and replacement of ancillary structures (e.g. access ladders and boat landings).	As required throughout Offshore Project lifetime.	
	Modifications to/replacement of J-tubes	Modifications to/ replacement of J-tubes e.g. during Inter-array Cable repair works.	As required throughout Offshore Project lifetime.	
WTGs	Scheduled inspections	Inspections within the WTG/on the exterior of the WTG, e.g. blade inspections.	Up to 35 main scheduled inspections and maintenance visits per turbine across the Offshore Project lifetime.	
	Replacement of consumables	Replacement of consumables within the WTG (e.g. filters, oils, lubricants).	Up to 35 main replacements per turbine undertaken during main scheduled inspection and maintenance visits.	
	Minor repairs and replacements within the WTG	Minor repairs and replacements (like-for-like) within the turbine e.g. motors, pumps, small electric equipment, circuit breakers, fuses.	Up to 10 times per year per turbine.	
	Major component replacement	Replacement of blades, gearboxes, transformers or generators.	Up to 3 replacements per turbines across the Offshore Project lifetime.	
	Painting or other coatings	Paint or other coatings applied (internal/external). Coatings on the blades and minor paint repairs to tower and nacelle.	As required annually per turbine.	
Foundations (OSP)	Removal of marine growth	Removal of marine growth from foundations or access ladders.	N/A	As required annually for the OSP.
	Replacement of corrosion	Remove and replace anodes required for corrosion protection.	N/A	As required every 5 years.

Component	Parameter	Description	Expected Frequency	
			Scenario 1 (OSP)	Scenario 2 (Onshore Landfall Substation)
	protection anodes			
	Painting	Application of paint or other coatings to protect the foundations from corrosion (internal/external), including surface preparation.	N/A	As required annually for the OSP.
	Replacement of access ladders and boat landings	Removal and replacement of ancillary structures (e.g. access ladders and boat landings).	N/A	As required throughout Offshore Project lifetime.
	Modifications to/ replacement of J-tubes	Modifications to/ replacement of J-tubes e.g. during inter-array or Export Cable repair works.	N/A	As required throughout Offshore Project lifetime.
OSP	Scheduled inspections	Inspections within the OSP/on the exterior of the OSP.	N/A	Up to 70 main scheduled inspection and maintenance visits across the Offshore Project lifetime. Up to 350 smaller scheduled inspection visits across the Offshore Project lifetime.
	Replacement of consumables and minor components.	Replacement of consumables (e.g., oils, lubricants) and minor components within the OSP.	N/A	Up to 70 undertaken during main scheduled inspection and maintenance visits.
	Major component replacement	Replacement of transformers, switchgear etc.	N/A	Up to 3 times across Offshore Project lifetime.
	Painting or other coatings	Paint or other coatings applied (internal/external).	N/A	As required annually for the OSP.

Component	Parameter	Description	Expected Frequency	
			Scenario 1 (OSP)	Scenario 2 (Onshore Landfall Substation)
Offshore Cables (Array and Export)	Routine inspections	Inspections of the cable and any cable protection, including at their entry into J-tubes on offshore structures.	Up to 1 scheduled inspection visit per year.	
	Site Investigation surveys	Survey of seabed and cable protection (if present).	Up to once per year	
	Offshore Cable repair	Repair and replacement of Offshore Cable section/whole Offshore Cable.	Up to 6 times across Offshore Project lifetime.	Up to 9 times across Offshore Project lifetime.
	Offshore Cable remediation	Reburial / protection of exposed Offshore Cable section.	Up to 6 times across Offshore Project lifetime	

Table 2-3 Project Design Envelope for Vessel Activities Operation and Maintenance (O&M)

Aspect	Parameter	Maximum Design Envelope
Vessel numbers (maximum on site at any one time)	Crew Transfer Vessel / Workboats	3
	Jack-up Vessels	1
	Cable repair vessels	1
	Other vessels	4
	Excavators or backhoe dredger	1
	Helicopters	1
Total O&M Vessel Movements (Return Trips) (Total for lifetime of Project)	Crew Transfer Vessel / Workboats	31,850 movements
	Jack-up Vessels	140 movements
	Cable repair vessels	12 movements
	Other vessels	20 movements
	Excavators or backhoe dredger	12 movements
	Helicopters	70 Movements
	Total (excluding helicopters)	32,034 movements
	Fuel consumption during the O&M phase	Crew Transfer Vessels typically use 500-800 litres per day Service Operation Vessels typically use between 5,000-8,000 litres per day

2.5.4 ONSHORE OPERATIONS AND MAINTENANCE

- 2.5.4.1 As the design of the OTW Project is not as advanced as the Offshore Project it is not possible to provide a detailed description of onshore operations and maintenance proposals.
- 2.5.4.2 At this stage it is known that the infrastructure associated with the OTW Project will be present for the duration of the operational life of the Offshore Project. In terms of maintenance of the Onshore Cables, there will be joint bays every 500-1,500m along the cable route, allowing for long-term access for the purposes of maintenance and/or repair work if required. It is anticipated that maintenance visits will be required once every 3 years and sensors within the Onshore Cables may be used to monitor the health and performance.
- 2.5.4.3 The Landfall Substation (if required) will not be manned during operation and workers will only be at the substation during periods of scheduled or unplanned maintenance. For the Grid Substation, there will be a small number of workers on site during normal, working hours.

2.5.5 DECOMMISSIONING

- 2.5.5.1 At the end of the Offshore Project's operational lifetime, it is anticipated that all structures located above the seabed will be fully removed. Decommissioning will generally follow the reverse sequence of construction, using similar types and numbers of vessels and equipment. While the duration is expected to be comparable to the construction phase, the programme may shorten depending on technological advances and best practice at the time of decommissioning.
- 2.5.5.2 Prior to construction, a decommissioning programme requires to be prepared and submitted, supported by appropriate financial security, in line with obligations under The Energy Act (2004) and the Scotland Act (2016). The programme will be developed in accordance with relevant guidance in effect at the time and will be a live document that is reviewed and updated periodically to ensure compliance with legislation, policy and best practice.
- 2.5.5.3 The potential offshore decommissioning processes are described below in **Table 2-4**.

Table 2-4 Likely decommissioning process

Element of the Offshore Project	Decommissioning process
Top side (OSP) and WTG	WTGs and OSP (if used) will be removed by reversing the methods used to install them (as appropriate, it is assumed no drilling will be required).
Foundations	Jackets removed and piles cut 1 m below seabed level and sections above removed. Removal of entire pile likely to result in disproportionate environmental impacts however this will need to be confirmed through consultation on the Decommissioning Programme to ensure most suitable approach is taken. Scour protection may be left in situ to preserve marine habitat that has established over the lifetime of the Offshore Project, but this would require confirmation through the Decommissioning Programme.
Scour Protection	The draft decommissioning guidance (Scottish Government, 2019) generally requires the full removal of installations, including scour protection and offshore cables. However, it notes that exceptions may be considered on a case-by-case basis, with the justification needing to be included in the decommissioning program, taking into account environmental conditions, risk balance, cost, and technological capabilities at that time. It is proposed that scour protection will be removed where feasible/appropriate, depending on the type and condition of the scour protection at the time of removal. This approach will be reviewed at the time of decommissioning in discussion with stakeholders, following the latest available guidance.
Offshore Cables	This will be discussed with stakeholders and regulators; however, sections of cable may be left in situ to avoid unnecessarily disturbing the seabed particularly where marine habitat has formed. This would be confirmed through consultation on the Decommissioning Programme to ensure most suitable approach is taken.
Vessels	Expected to be the same as construction with the exception of the piling installation vessel.
Surveys	Surveys will be undertaken following decommissioning to ensure the Offshore Project is safely and effectively decommissioned and undertaken in accordance with Decommissioning Programme. If any infrastructure is left in situ, then this may be monitored, although the requirement will be confirmed with consultees.

2.5.6 SAFETY ZONES

- 2.5.6.1 During construction, safety zones of 500 m radius will be sought for the installation/construction of all offshore infrastructure during the construction phase. This will include, but not be limited to, the installation of the WTGs, the OSP (if required) as well as their associated foundations. If multiple construction activities are taking place at the same time separate safety zones will be sought for each activity.
- 2.5.6.2 Before any commissioning activities, a safety zone with a radius of 50 m will be established around each constructed WTG or OSP (if required), and their associated foundation structures. This measure ensures the safety of personnel and equipment during the final stages of construction. Further details will be provided in the Sporad na Mara Safety Zone Statement which will be submitted post consent.
- 2.5.6.3 An Outline Navigational Safety and Vessel Management Plan has been submitted as part of the Application. It will be updated post consent as more information becomes available and will be agreed upon with relevant stakeholders prior to construction.

3 LEGISLATION AND POLICY CONTEXT

3.1 INTRODUCTION

- 3.1.1.1 This section of the Planning Statement provides details of the legislative context and relevant planning and marine policy documents, their status and purpose, summarising the framework against which the consenting applications will be determined.
- 3.1.1.2 In the case of this application, the Scottish and UK policies that are material in the decision making of the proposed Offshore Development include:
- National Planning Framework (NPF4).
 - UK Marine Policy Statement;
 - Scotland's National Marine Plan (NMP).
- 3.1.1.3 'Scotland's Sectoral Marine Plan for Offshore Wind Energy (SMP)' and 'Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition' will also be important considerations when assessing the proposed Offshore Development.
- 3.1.1.4 An assessment of the Offshore Project against the relevant policies, tests and criteria contained within these publications is provided in Section 5.

3.2 LEGISLATION AND STRATEGY

3.2.1 CLIMATE CHANGE (SCOTLAND) ACT 2019

- 3.2.1.1 The Climate Change (Scotland) Act 2019 commits Scotland to achieve net zero emissions of all greenhouse gasses by 2045, ahead of the wider UK target of 2050. These targets are consistent with the ambitious Scottish contributions to meet the goals of the 2015 United Nations Paris Agreement on climate change, which is to limit global average temperature increases to 1.5 degrees Celsius.

3.2.2 SCOTTISH ENERGY STRATEGY

- 3.2.2.1 The 2017 Scottish Energy Strategy established a goal for Scotland to source 50% of its energy requirements for heat, transport, and electricity from renewable resources by 2030. This commitment was reinforced in the Scottish Government Climate Change Plan: The 3rd Report on Proposals and Policies 2018–2032, which also set forth an ambition to achieve substantial decarbonisation of Scotland's electricity system by 2032.
- 3.2.2.2 Offshore wind has been identified as a critical component in Scotland's efforts to address climate change. The Offshore Wind Policy Statement sets out the Scottish Government's expectations for offshore wind development, including a target of reaching at least 8-11 GW of installed capacity by

2030. This objective is reiterated in Scotland's Energy Strategy Position Statement (2021) and the Scottish Government Update to the Climate Change Plan 2018–2032 (2020). In conjunction with the release of the draft Energy Strategy and Just Transition Plan (ESJTP) in 2024, Scottish Ministers have conducted consultations to consider extending offshore wind deployment goals through 2045, consistent with the Government's net zero commitments. The draft ESJTP outlines a strategy to deliver affordable, resilient, and clean energy for Scotland, emphasising increased domestic production of renewable electricity by 2030 and a significant reduction in energy sector emissions.

- 3.2.2.3 On 28 January 2026, the Scottish Government published an Update to the 2020 Offshore Wind Policy Statement, recognising substantial developments in policy and planning for offshore renewable energy in Scotland and the wider United Kingdom since 2020. The updated Policy Statement reaffirms the Scottish Government's commitment to expanding offshore wind deployment, resetting its ambition of up to 40 GW of new offshore wind capacity by 2040, in addition to the already operational or consented capacity, as of August 2025.
- 3.2.2.4 The UK Government's Clean Power 2030 Action Plan was highlighted as a catalyst for the policy change. The Action Plan aims to deliver 43-50 GW of offshore wind in Great Britain for a 95% clean energy system by 2030. The Scottish Government is working with the UK government to decarbonise energy and achieve net zero. The plan highlights Scotland's key role and stresses the importance of advancing projects, which are already in the pipeline, before 2030.

3.3 MARINE POLICY

- 3.3.1.1 The Marine Strategy Framework Directive (MSFD) was transposed into UK law under the Marine Strategy Regulations 2010. The UK Marine Policy Statement (MPS) explains the high-level aims of the MSFD. National and regional marine plans then break these down into detailed activities.
- 3.3.1.2 Across the UK, new systems of marine planning are being introduced through primary legislation. The MPS is the framework for these marine planning systems. It provides the high-level policy context within which national and sub-national Marine Plans will be developed, implemented, monitored, amended and will ensure appropriate consistency in marine planning across the UK marine area. The MPS also sets the direction for marine licensing and other relevant authorisation systems.

3.3.2 NATIONAL MARINE PLAN (NMP)

- 3.3.2.1 In March 2015, the Scottish Government published Scotland's NMP – a Single Framework for Managing our Seas. The NMP sets out strategic policies for the sustainable development of Scotland's marine resources out to 200 nm.
- 3.3.2.2 The NMP recognises that sustainable development and the use of the marine environment can provide economic benefits, including growth opportunities, employment, skills development,

investment, and trade. Chapter 11 of the NMP identifies key objectives of the marine planning policy for offshore wind, including:

- Sustainable development of offshore wind in the most suitable locations;
- Economic benefits from offshore wind, maximised by securing a competitive local supply chain in Scotland;
- Contribute to achieving the renewables target to generate electricity equivalent to 100% of Scotland's gross annual electricity consumption from renewable sources by 2020;
- Contribute to achieving the decarbonisation target.

3.3.2.3 It is noted that the target to generate electricity equivalent to 100% of Scotland's gross annual electricity consumption from renewable sources by 2020 was narrowly missed. This highlights the increasing importance and urgency for the successful delivery of renewable energy projects, with the NMP identifying that Scotland's offshore waters provide an opportunity for the further development of an internationally important renewable energy industry.

3.3.2.4 The NMP also provides specific policies in relation to renewable energy. Policy RENEWABLES 3, 4 and 5 are considered relevant in terms of providing guidance to marine decision makers on matters relating to ensuring the test of sustainable development is assessed on a case-by-case basis, and that applications for offshore windfarms that require marine licences accord with the Marine Licensing Manual and Marine Scotland's Licensing Policy. The RENEWABLES Policy also requires that marine decision makers ensure that renewables energy projects demonstrate compliance with the EIA legislative requirements. The Project's compliance with these requirements is demonstrated through the accompanying EIAR.

3.3.2.5 The Scottish Government has begun working on the NMP2, which will update and replace the existing NMP. Consultations events took place in 2024-2025 on the Planning Position Statement. However, at this stage, no documentation on NMP2 has been published with carries any material weight in the determination of this s.36 consent application.

3.3.3 SECTORAL MARINE PLAN

3.3.3.1 The first Sectoral Marine Plan for Offshore Wind Energy (Blue Seas Green Energy) was adopted by the Scottish Government in 2011. In July 2013, Marine Scotland published the Draft Sectoral Marine Plan for offshore wind, wave and tidal energy in Scotland. This publication identified potential future options for commercial scale (potential to generate greater than 100 megawatt (MW)) offshore wind energy developments. Since then, the Scottish Government published the latest SMP for Offshore Wind Energy in October 2020 which builds upon the work conducted in the development of the 2011 and 2013 plans.

3.3.3.2 The 2020 SMP integrates newer policy, regulatory, technological and market developments to create a new strategic planning process. The SMP aims to contribute towards achieving the climate change policy objectives and targets established by the Scottish and UK Governments by using

spatial strategy to inform the seabed licensing process for commercial offshore wind developments in Scottish waters.

- 3.3.3.3 The SMP also aims to maximise the benefits for Scotland's communities and people whilst keeping adverse effects on other marine users, economic sectors and the environment to a minimum. The SMP identified 15 final plan options in four regions in Scotland that have the potential to generate several GW of renewable energy. The SMP has been developed according to the strategic aims of the NMP which addresses the potential interactions between renewable energy development and other marine users.
- 3.3.3.4 The Offshore Project falls within the N4 option area of the SMP.
- 3.3.3.5 A draft version of an updated Sectoral Marine Plan was consulted upon in 2025. The Offshore Project is again identified in the N4 area and described as being at pre-planning stage. The Draft Sectoral Marine Plan still emphasises the need to maximise the benefits for Scotland's communities and people whilst keeping adverse effects on marine users, economic sectors and the environment to a minimum. The proposed development has the opportunity to contribute positively to these factors and will be considered further in Chapters 6 and 22 of the EIAR.

3.4 NATIONAL PLANNING POLICY

3.4.1 NATIONAL PLANNING FRAMEWORK 4 (NPF4)

- 3.4.1.1 NPF4 was adopted by the Scottish Government on 13 February 2023 and sets out the national spatial strategy for Scotland to 2045. NPF4 sets out Scotland's spatial principles, regional priorities, national developments, and national planning policy.
- 3.4.1.2 The Infrastructure Investment Plan (IIP) identified that NPF4 highlighted that national planning policies would include an infrastructure first approach. The NPF4 strategy, policies and national developments are aligned to the strategic themes of the IIP, which aim to enable the transition to net zero emissions and environmental sustainability; driving inclusive economic growth; and building resilient and sustainable places.
- 3.4.1.3 The NPF4 has a 'plan-led approach' which is central to supporting the delivery of Scotland's national outcomes and broader sustainable development goals. While NPF4 does not extend to marine areas, it acknowledges the importance of onshore development in supporting offshore renewable energy projects defining Scotland-wide Strategic Renewable Energy and Transmission Infrastructure as national development. This includes offshore electricity generation exceeding 50 MW and established the principle of development. Part 2 of NPF4 outlines national planning policies relevant to the onshore aspects of such projects. Policy 1 gives significant weight to the global climate emergency in all planning decisions and Policy 11 specifically seeks to encourage,

promote, and facilitate renewable energy development both onshore and offshore, supporting infrastructure for generation, storage, transmission, and distribution.

3.4.1.4 Renewable energy is also a key theme within Annex B – National Developments Statements of Need, which describes developments that are identified as being of national importance. Key national developments include:

- Energy Innovation Development on the Islands: “Supports proposed developments in the Outer Hebrides, Shetland and Orkney Island groups, for renewable energy generation, renewable hydrogen production, infrastructure and shipping, and associated opportunities in the supply chain for fabrication, research and development”;
- Strategic Renewable Electricity Generation and Transmission Infrastructure: “Supports renewable electricity generation, repowering, and expansion of the electricity grid”.

3.5 LOCAL PLANNING POLICY

3.5.1.1 Local planning policy contained within the Outer Hebrides Local Development Plan is primarily concerned with onshore development activities, there are some potential overlaps with the Offshore Project in how it interacts with fishing and coastal matters. More widely the Local Development Plan provides support for proposals that would help to meet targets and objectives set at a national level for electricity grid reinforcement, infrastructure and energy generation. In addition, it states that proposals for renewable energy projects other than wind farm development, including land based infrastructure associated with offshore projects, will require to demonstrate appropriate siting and design, no significant adverse impacts on environmental and amenity matters and appropriate decommissioning arrangements as well as its contribution to meeting Scottish and UK energy supply targets and local economic impact.

4 THE NEED FOR THE PROJECT

- 4.1.1.1 The proposed offshore infrastructure is a key aspect of the wider Project, being the generator of the clean renewable energy that enables Scotland and the UK to meet its electricity demand in a sustainable manner.
- 4.1.1.2 The legal binding Paris Agreement commits the UK to ambitious greenhouse gas (GHG) reductions: at least 68% by 2030 from 1990 levels, aiming to limit global warming to well below 2°C, with a preferred cap of 1.5°C. To support this, the UK Government's Clean Power 2030 Action Plan targets 43-50GW of offshore wind by 2030 and 72-89GW by 2035, highlighting the need for rapid offshore wind expansion, such as that provided by the Offshore Project which has an estimated generation capacity of 900MW.
- 4.1.1.3 The Climate Change Act (2008) (UK Government, 2008) legally binds the UK to reduce GHG emissions by at least 80% by 2050 compared to 1990 levels and sets the backdrop against which current Scottish climate change legislation and strategy have been developed.
- 4.1.1.4 Scotland's Climate Change Plan and related legislation set a net zero target by 2045, with interim GHG reductions of 75% by 2030 and 90% by 2040. Scotland aims for 8-11GW of offshore wind by 2030, rising to 40GW by 2035-2040, underscoring the need for large-scale renewable energy generation schemes like those provided by the Project. The Scottish Government's Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 then sets out the aim to replace annual and interim targets with multiyear carbon budgets to ensure Scottish Ministers are legally bound to meet climate change goals. The Scottish Energy Statement (Scottish Government, 2020) and Offshore Wind Policy Statement (Scottish Government, 2020), which outline the approach to a low-carbon energy future, include the strategic importance of offshore wind in meeting Scotland's climate targets.
- 4.1.1.5 NPF4 prioritises development that addresses the global climate emergency and identifies strategic-scale renewables, such as offshore wind, as national developments. This designation confirms the Project's national significance and establishes a strong needs case for the Project.
- 4.1.1.6 The designation of the N4 Offshore Array Area in the Sectoral Marine Plan (Scottish Government, 2020) demonstrates policy support for both the need for commercial-scale offshore wind in Scotland to help meet the Net Zero and renewable energy generation targets, and for such a development to take place in this location.
- 4.1.1.7 The Scottish offshore wind pipeline analysis, undertaken on behalf of Scottish Renewables (2025) demonstrates that Scotland's offshore wind project pipeline represents a nationally significant opportunity, with all projects expected to progress toward deployment under a range of future scenarios. The analysis assumes full progression of the pipeline of deployment with scenarios indicating between 38 and 44GW of operational UK offshore wind capacity by 2030, depending on planning and installation timelines. This study reinforces that every project within the Scottish

pipeline will be required to contribute fully to meeting Scotland's energy, economic and net zero targets.

4.1.1.8 The delivery of the Sporad na Mara Project will therefore:

- Produce a significant renewable energy supply to the National Grid in support of UK and Scottish Government targets for net zero emissions and renewable energy generation;
- Increase the security of supply of energy for Scottish and UK consumers;
- Support the Scottish supply chain of businesses which support offshore and renewable energy projects;
- Support economic growth in Scotland/*Alba*.

5 POLICY CONSIDERATIONS

5.1 INTRODUCTION

- 5.1.1.1 The following section outlines the key policy considerations relevant to the assessment of the Offshore Project and demonstrates how the proposed offshore wind farm aligns with the established legislative and policy framework for marine renewable energy development in Scotland and the UK. It identifies the principal policy documents that guide decision-making for offshore wind projects, including those that set the strategic context for development in Scottish waters and those that establish the Project's national importance. This section explains how the Offshore Project has been designed and sited with reference to these policy requirements, and how it contributes to meeting national climate, energy and marine planning objectives. Policy considerations are discussed under the following topic headings that broadly reflect the structure and assessments provided in the EIAR.
- 5.1.1.2 Together, these considerations provide the basis for establishing the strong policy support for the principle of offshore development in the Project's chosen location.

5.2 PRINCIPLE OF DEVELOPMENT

- 5.2.1.1 The principle of the Offshore Project is well-established through a range of UK and Scottish legislation and policy.
- 5.2.1.2 This Offshore Project will deliver a notable contribution with an assumed indicative generation capacity of 900MW of renewable electricity to the UK's national electricity transmission network, enough to power millions of homes. This energy production will assist with the meeting of legally binding climate targets and improve energy security, as well as supporting jobs and the sustainable energy sector in Scotland. The Offshore Project would also support local supply chains, ensure it creates fair employment, provide skill and training opportunities alongside apprenticeship/work experience opportunities and ensure the local benefits provided by the Offshore Project are community led.
- 5.2.1.3 Support for the Offshore Project is firmly embedded within Scotland's Marine Planning Framework. Scotland's National Marine Plan (2015) (Scottish Government, 2025) establishes the basis for suitable development in Scottish waters and explicitly supports the deployment of offshore renewable energy where environmental effects can be managed. The Project's Offshore Assessment Area (OAA) corresponds to Option N4, identified within the Sectoral Marine Plan for Offshore Wind (2020) and retained within the Draft Updated Sectoral Marine Plan (2025). These plans confirm that N4 is an area suitable in principle for offshore wind development, creating a positive starting position for the Offshore Project unless its environmental impacts are demonstrated to outweigh its substantial contribution to national climate targets.

- 5.2.1.4 The Scottish Government's updated Offshore Wind Policy Statement (OWPS) sets out a significantly increased national ambition for offshore wind deployment, placing strong policy emphasis on delivering the entire existing project pipeline, which explicitly includes all ScotWind project (including N4 – Sporad na Mara). Meaning the updated statement provides clear strategic and policy support for its progression.
- 5.2.1.5 This strong marine-policy foundation aligns with wider national policy support for the Offshore Project as an offshore renewable energy development. Under National Planning Framework 4 (NPF4), the Offshore Project is designated as a National Development, meaning the principle of development is established at national level and does not require further justification or agreement by the planning authority. The Offshore Project also aligns with NPF4 Policy 1, which gives significant weight to the global climate and nature crises when assessing development, and Policy 11, which promotes renewable energy generation, including offshore wind, where impacts can be appropriately addressed.
- 5.2.1.6 Taken together, the marine and national policy frameworks support the principle of offshore development in this location. The Offshore Project is well aligned with UK and Scottish policy objectives for renewable energy deployment within the marine environment, and the principle of development is demonstrated against relevant policy.

5.3 SOCIO-ECONOMICS

5.3.1 SUMMARY OF KEY POLICY REQUIREMENTS

5.3.1.1 Relevant policy in relation to Socio-Economics includes:

- Scottish National Marine Plan (2015):
 - GEN 2 encourages development which provides economic benefit to Scottish communities (when consistent with other policies within the Plan);
 - GEN 3 encourages development which provides social benefits (when consistent with other policies within the Plan);
- NPF4
 - Policy 11 supports all forms of renewable, low carbon and zero emissions developments and states that such developments will be supported where they maximise net economic benefits such as employment, associated business and supply chain opportunities.

5.3.1.2 The socio-economic effects of the Offshore Project are considered at a whole Project level, covering both offshore and onshore elements, as many of the socio-economic effects and the receptors identified for the assessment, cannot accurately be split between the offshore and onshore elements of the Project. Unless specifically stated, the information provided in **Chapter 6: Socio-Economics, Volume 2a** of the EIA, therefore relates to the combined offshore and onshore elements of the Project.

5.3.2 IMPACT ASSESSMENT

Job Creation and Skills Development

- 5.3.2.1 During the construction phase of the Project, it is estimated that the Project could create or safeguard between 373 and 401 direct person years of employment in the Western Isles. This equates to an average of between 75 and 80 full time equivalents (FTEs) per year over the construction period. Elsewhere in Scotland, construction would create between 2,639 and 2,839 direct person years of employment which is the equivalent to between 528 and 568 FTE jobs per year.
- 5.3.2.2 As well as direct employment, the construction of the Project would also support indirect and induced employment in the supply chain as a result of increased spending in the local economy. 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 skills and capacity needed to construct and operate the Project. It is anticipated that much of the employment created during construction will be in construction and manufacturing services.
- 5.3.2.3 In total, it is estimated that across Scotland as a whole, construction would create or safeguard between 600 and 650 direct FTE jobs per year, with a further 260-280 indirect FTE jobs in the supply chain and 420 - 460 induced FTE jobs in the wider economy. It is estimated that approximately 12% of direct jobs (75 – 80) would be retained within the Western Isles.
- 5.3.2.4 In the operation and maintenance phase of the Project between 6,129 and 6,592 direct person years of employment would be created within the Western Isles over the Project's 35-year operational lifecycle. Dividing local direct person years of employment over the 35-year operational lifecycle means the Project could create or safeguard between 175 – 188 FTE jobs per annum. Elsewhere in Scotland, operation and maintenance would create or safeguard between 349 and 375 FTE jobs per year, approximately half of which would be retained in the Western Isles.
- 5.3.2.5 It is expected that operational and maintenance jobs would be in the manufacturing; wholesale and retail; administrative and support services; professional, scientific and technical; and financial and insurance sectors. Data shows that there are currently 2,925 people employed in these sectors of the economy in the Western Isles, and 891,000 employed in these sectors in Scotland.

Economic Impact

Gross Value Added (GVA): Direct

- 5.3.2.6 The construction phase of the Project would generate between £32m and £34m in direct GVA within the Western Isles over the period. This equates to between 6.4m and £6.8m in GVA per annum to the Western Isles economy.
- 5.3.2.7 The operation and maintenance phase of the Project would directly generate spends between £330m - £355m in direct GVA within the Western Isles, and £328m to £353m at a Scotland/Alba

level, over the operational period. On an annual basis this equates to a contribution of between £9.4m - £10.1m in the Western Isles. With the Western Isles having an annual GVA baseline estimate of £645m, this is the equivalent of around 1.5%.

5.3.2.8 At a National level across Scotland/Alba an additional GVA of between £9.4m - £10.1m per annum during the operation and maintenance of the Project is predicted.

5.3.2.9 Across the lifetime of the Project, the EIA finds that both the Western Isles economy and the National economy is considered to have a low sensitivity to change and the project would result in beneficial economic effects. These are judged to be of a medium magnitude of change in the Western Isles which would result in a minor beneficial impact. At a national level, a negligible magnitude of change would occur which would result in a negligible change.

GVA: Indirect

5.3.2.10 The construction phase of the Project would generate between £11m and £12m indirect GVA within the Western Isles over the period and between £76m and £82m nationally.

5.3.2.11 During the operation and maintenance phase, indirect effects (from spend on suppliers and procured services) would be between £76m-£81m in the Western Isles and £75m - £81m nationally.

GVA: Induced

5.3.2.12 The induced spend during the construction phase in the Western Isles during the construction period is estimated to be between £22m and £24m, and between £159m and £171m nationally.

5.3.2.13 Induced spend (i.e. the onward spend of monies received by those receiving direct and indirect spend) is estimated to be between £242m and £260m in the Western Isles, and between £240m and £258m nationally over the operation and maintenance period.

GVA decommissioning

5.3.2.14 Any GVA effects arising from the decommissioning of the Project are expected to be comparable to, or less than, those arising during construction. As such, it is not expected that there would be any significant effects on socio-economics from the decommissioning phase of the Project.

Tourism Sector

5.3.2.15 During construction, effects on the tourism sector could arise as a result of:

- Temporary changes in the availability of workers in the sector;
- Temporary changes in demand for tourist accommodation;
- Temporary changes in the availability of air and ferry travel for visitors, and in port capacity for cruise ships;
- Temporary impacts on tourism receptors, including accommodation providers, such as loss of access, disruption, displacement, noise or changes in the visual environment.

- 5.3.2.16 With mitigation in place, the magnitude of impact during the construction phase on tourism in the Stornoway smaller study area (SSA) and in Lewis and Harris / *Leòdhas agus Na Hearadh* as a whole from changes in demand for transport and accommodation and increased competition for labour has been assessed as low within the EIAR. The assessment concluded that there would be a short-term, slight alteration to the value of the sector in these areas that would be intermittent throughout the construction period, which could lead to minor changes in business revenues or in employment.
- 5.3.2.17 In the West Side SSA the assessment concluded that there could be localised effects on tourism activity arising from temporary impacts on tourism receptors and recreational users from the construction of the Project. While impacts on tourism are anticipated to be temporary, the offshore construction period overlaps with the peak months for tourism between April – October, which could increase the likelihood of effects on tourism and recreational behaviour. The EIAR notes in **Chapter 20: Other Sea Users, and Recreation, Volume 2a**, that there would be minor adverse effects that would not be significant for boat tour operators, angling tour operators, and recreational sea anglers as a result of temporary displacement or disturbance associated with 500 m safety zones, the presence of installation vessels, and construction activities. Effects for surfers, other recreational sea users and tourists would also be minor adverse.
- 5.3.2.18 **Chapter 20, Volume 2a** of the EIAR also reports minor adverse effects for tourists, sea users and visitors to beaches on the west coast as a result of effects on amenity arising from construction activity.
- 5.3.2.19 **Chapter 6, Volume 2a** of the EIAR identifies that tourism is an important employer in the Western Isles, accounting for a higher-than-average proportion of jobs and providing an important source of income for local people and businesses. Because the local tourism sector is highly dependent on natural capital and has limited capacity to expand or adapt in response to changing demand, the sensitivity of the sector in the West Side SSA, in the Stornoway SSA, and in Lewis and Harris/ *Leòdhas agus Na Hearadh* is assessed as medium. Based on the low magnitude of impact and medium sensitivity of the sector, the overall significance of the effect on the tourism sector during the construction stage of the Project is assessed as minor adverse and therefore not significant.
- 5.3.2.20 During the operation and maintenance phase, effects on the tourism sector could arise as a result of:
- Changes in demand for tourism accommodation;
 - Impacts on tourism receptors, including accommodation providers, such as a loss of access, disruption, displacement, noise or changes in the visual environment.
- 5.3.2.21 During operation and maintenance, it is proposed that workers required for routine maintenance tasks who are not resident on Lewis and Harris/ *Leòdhas agus Na Hearadh* would either be accommodated on an SOV or would be transported to site using CTVs. There may, therefore, be some short-term, intermittent requirements for onshore accommodation. While there is the

potential that this increase in demand could reduce availability of accommodation for tourists during the peak season, there is also the potential that it could result in positive effects for tourist accommodation providers throughout the operation and maintenance phase. It is likely that there would be capacity in the tourist accommodation sector even at the peak of the tourist season.

- 5.3.2.22 There may also be additional demand for transport, including air and ferry services to the island, from the operational workforce, including both routine maintenance workers and the permanent operation and maintenance workforce, which could reduce availability for tourists during the peak season. The impact would be intermittent and would be reduced should an SOV be used to accommodate maintenance workers. **Chapter 20, Volume 2a** of the EIAR, reports a negligible effect on the port of Stornoway/*Steòrnabhagh* arising from an increase in demand for port services during operation, including as a result of increased demand from the operation and maintenance workforce.
- 5.3.2.23 As the impact on tourist accommodation and on the availability of transport to the island from the operational workforce is expected to be very small, and there would be no significant effect on tourism and recreation receptors from the loss of access or impact on wave resource, the magnitude of impact on the tourism sector in the Stornoway SSA and in the Lewis and Harris/*Leòdhas agus Na Hearadh* as a whole is assessed as low, as there would be a slight alteration to the value of the sector in these areas, which could lead to minor changes in business revenues or in employment.
- 5.3.2.24 Tourism is considered an important employer in the Western Isles, accounting for a higher-than-average proportion of jobs and providing an important source of income for local people and businesses. As the tourism sector is one of the key local industries and is to some extent dependent on natural resources, the sensitivity of the sector has been assessed as medium
- 5.3.2.25 Based on the low magnitude of impact and medium sensitivity of the tourism sector, the overall significance of the effect is assessed as minor adverse, which is not significant in EIA terms.

Fisheries and Aquaculture

- 5.3.2.26 During construction, effects on the fisheries, aquaculture and fish/shellfish processing sector could arise as a result of:
- Temporary disturbance to fishing or aquaculture resources and activity;
 - Increased demand for port services which could impact on imports and exports;
 - Temporary changes in the availability of workers in the sector.
- 5.3.2.27 Effects on commercial fishing activity, including displacement of or disruption to commercially important fish and shellfish resources, are assessed in **Chapter 21 Commercial Fisheries, Volume 2A** of the EIAR. The assessment concludes that there could be moderate adverse effects during the construction of the Offshore Project on potting for lobster, crab and ballan wrasse, as a result of a reduction in access to, or exclusion from established fishing grounds within the Array Area and

within the Offshore Cable Areas of Search; displacement leading to gear conflict and increased fishing pressure on adjacent grounds, and the physical presence of infrastructure leading to gear snagging. Following the implementation of mitigation measures identified in **Chapter 21 Commercial Fisheries, Volume 2a** of the EIAR, the significance of these effects is reduced to minor adverse, which is not significant in EIA terms.

- 5.3.2.28 Effects on aquaculture activity are assessed in **Chapter 20, Volume 2a** of the EIAR, which reports that construction activity would result in a negligible effect for multinational aquaculture companies operating in Lewis/*Eilean Leòdhais* that would not be significant, and a minor adverse effect for local aquaculture companies that would not be considered significant in EIA terms. **Chapter 16: Shipping and Navigation, Volume 2a** notes that the closest port or harbour area to the Array Area is Loch Roag/*Loch Ròg* which contains several aquaculture sites. Base ports for the Offshore Project are not currently known, but with mitigation in place, it is considered that there would be no significant adverse effects on access to ports and facilities in the Loch Roag/*Loch Ròg* area.
- 5.3.2.29 In relation to effects on imports and exports during the construction phase of the Project, **Chapter 20, Volume 2a** of the EIAR, assesses temporary disturbance to ports and harbours during construction due to increased demand for port services, including increased demand for ferry services from the construction workforce. The main Ullapool/*Ulapul* – Stornoway/*Steòrnabhagh* ferry service is used by freight as well as by passenger traffic, and so increased demand for ferry services has the potential to impact on the capacity for freight. **Chapter 20: Volume 2a** reports that there would be a minor adverse effect on small ports on Lewis/*Eilean Leòdhais* that would not be significant and a negligible effect on the port of Stornoway/*Steòrnabhagh* that would also not be significant.
- 5.3.2.30 **Chapter 20, Volume 2a** of the EIAR notes that the additional demand for workers during construction of the Offshore Project could lead to some market pressure. While there is an existing construction workforce in the Western Isles, there could be knock on effects for other sectors, including potential displacement of workers from the fisheries and aquaculture sector. It is likely that some workers in the fisheries and aquaculture sectors have transferable skill sets to the offshore wind sector, increasing the potential for displacement effects. Following the assessment contained within the EIAR, it is considered that there is some capacity within the labour market to absorb construction jobs, and the likelihood of knock-on effects for the fisheries and aquaculture sector is relatively small. The seasonality of offshore construction activity – between the months of April and October – could also reduce the likelihood of displacement.
- 5.3.2.31 With mitigation in place, there are not expected to be any significant residual effects on either commercial fishing activity or on aquaculture during construction, and any displacement of labour is likely to be small. Therefore, it is expected that any knock-on effects on the wider sector and the fish/shellfish processing supply chain would also be small.

- 5.3.2.32 During the operation and maintenance phase of the Project, effects on the fisheries, aquaculture, and fish/shellfish processing sector could arise as a result of disturbance to fishing or aquaculture resources.
- 5.3.2.33 Effects on commercial fishing activity, including any displacement of or disruption to commercially important fish and shellfish resources, are assessed in **Chapter 21 Commercial Fisheries, Volume 2a** of the EIA. The assessment concludes that there could be moderate adverse effects during the operation and maintenance phase on potting for lobster, crab and ballan wrasse, as a result of the physical presence of infrastructure leading to gear snagging. Mitigation measures have been identified to address these effects and based on the successful application of these measures, the significance of these effects is considered to be minor adverse, which would not be significant in EIA terms.
- 5.3.2.34 In relation to aquaculture, **Chapter 20, Volume 2a** of the EIA reports a negligible effect for multinational aquaculture companies operating in Lewis/*Eilean Leòdhais* that would not be significant, and a minor adverse effect for local aquaculture companies that would also not be significant. With appropriate mitigation in place, there would be no significant adverse effect on access to ports and facilities in the Loch Roag/*Loch Ròg* area, where a number of aquaculture sites are located. The impact on the ability to import or export goods is expected to be small. **Chapter 20, Volume 2a** of the EIA reports that the effects on the port of Stornoway/*Steòrnabhagh* during operation would be negligible and not significant, as the Stornoway Deep Water Terminal is expected to be able to support the continued growth of the port.
- 5.3.2.35 With mitigation in place, there are not expected to be any significant residual effects on either commercial fishing activity or on aquaculture during operation and maintenance of the Project. **Chapter 6, Volume 2a** of the EIA considers that fisheries, aquaculture and fish/shellfish processing are important employers in the Western Isles. As the sector is one of the key local industries and is highly dependent on natural resources, the sensitivity of the sector is assessed as high.
- 5.3.2.36 Based on the low magnitude of impact and high sensitivity of fisheries, aquaculture and fish/shellfish processing, the overall significance of the effects is assessed as minor adverse, which is not significant in EIA terms.

Transport and Storage

- 5.3.2.37 During construction, effects on the transport and storage sector could arise as a result of:
- Temporary loss of access or distribution to ports and harbours;
 - Additional demand for port services;
 - Temporary changes in the availability of workers in the sector.
- 5.3.2.38 Employment in the transport and storage sector accounts for a higher proportion of employment in the Western Isles than Scotland/*Alba* as a whole, which may reflect the importance of air and

ferry services between the islands and the mainland, and associated employment at airports, ferry terminals, and at sea, particularly in the Stornoway SSA where the port of Stornoway/*Steòrnabhagh* is located.

- 5.3.2.39 **Chapter 20, Volume 2a** of the EIAR assesses temporary disturbance to ports and harbours due to increase demand for port services and marine maintenance. The assessment for the port of Stornoway/*Steòrnabhagh* notes that the additional workforce associated with the construction of the Offshore Project may put pressure on ferry services to Lewis/*Eilean Leòdhais*, and particularly on the main Ullapool/*Ulapul* – Stornoway/*Steòrnabhagh* route. However, the effect is assessed as negligible and not significant.
- 5.3.2.40 Disruption to ports and increased demand for port services would be considered temporary and intermittent during periods of construction activity between April and October. Displacement of workers from the sector is likely to be small and have little or no impact on port operations. The magnitude of the impact on employment in the transport and storage sector in the West Side SSA, Stornoway SSA, and in Lewis/ *Eilean Leòdhais* and Harris/*Na Hearadh* is assessed as low as there would be a slight alteration to the value of the sector in these areas, which could lead to minor changes in business revenues or in employment.
- 5.3.2.41 The transport and storage sector is an important employer in the Western Isles, accounting for 7.9% of total employment. As the sector has some capacity to expand or adapt in response to changing demand for workers, the sensitivity of the sector in the West Side SSA, the Stornoway SSA, and in Lewis and Harris/*Leòdhas agus Na Hearadh* is assessed as medium.
- 5.3.2.42 Given the low magnitude of impact and medium sensitivity during the construction phase of the Project, the overall significance of effect on the transport and storage sector is assessed as minor adverse, which is not significant in EIA terms.
- 5.3.2.43 During the operation and maintenance phase of the Project, effects on the transport and storage sector could arise as a result of disruption to ports and harbour operations. Should the currently preferred location of Stornoway/*Steòrnabhagh*, or another location on Lewis/*Eilean Leòdhais*, be chosen for the O&M base, there is also the potential for beneficial effects associated with increased demand for port services and facilities. Effects on the transport and storage sector are assessed for the Stornoway SSA and the island study area (Lewis and Harris/*Leòdhas agus Na Hearadh*).
- 5.3.2.44 Employment in the transport and storage sector accounts for a higher proportion of employment in the Western Isles than Scotland/*Alba* as a whole, which reflects the importance of air and ferry services between the islands and the mainland, and associated employment at airports, ferry terminals, and at sea. There is the potential for disturbance to port operations to impact on employment in the transport and storage sector in Lewis and Harris/*Leòdhas agus Na Hearadh*, and particularly in the Stornoway SSA, where the port of Stornoway/*Steòrnabhagh* is located.

- 5.3.2.45 **Chapter 16, Volume 2a** of the EIAR assesses potential effects arising from reduced access for vessels to local ports, harbours and facilities. It is not anticipated that operation and maintenance activities would have a substantial effect on vessel approaches to and from Loch Roag/*Loch Ròg* and, with mitigation in place and it is concluded that the effect would not be significant.
- 5.3.2.46 **Chapter 20, Volume 2a** of the EIAR reports that there could be increased demand for port services during operation and maintenance due to the presence of vessels required to operate the Project. For small ports on Lewis/*Eilean Leòdhais*, which include those within Loch Roag/*Loch Ròg* and others on the west coast typically used by tourist and pleasure craft, the effect is assessed as minor and not significant. For Stornoway Port, **Chapter 20, Volume 2a** assesses the effect as negligible and not significant, due in part to the recent (April 2024) completion of the Stornoway Deep Water Terminal, part of the 20-year Stornoway Port Authority Master Plan (2017), which has increased capacity at the port.
- 5.3.2.47 Taking into account the potential for minor disturbance to port operations, and the potential long-term economic benefits associated with the operation and maintenance of the Project, the magnitude of the impact on the transport and storage sector is assessed as low as there would be a slight alteration to the value of the sector in these areas, which could include minor changes in business revenues or in employment.
- 5.3.2.48 The transport and storage sector is an important employer in the Western Isles, accounting for 7.9% of total employment. As the sector is one of the key local industries, the sensitivity of the sector in the Stornoway SSA and Lewis and Harris/*Leòdhas agus Na Hearadh* is assessed as medium.
- 5.3.2.49 Based on the low magnitude of impact and medium sensitivity of the transport and storage sector, the overall significance of the effect on the sector in the Stornoway SSA and Lewis and Harris/*Leòdhas agus Na Hearadh* is assessed as minor adverse which is not significant in EIA terms.

5.3.3 PLANNING ASSESSMENT

- 5.3.3.1 Relevant policies set out a need for the Offshore Project to demonstrate it would provide socio-economic benefits and how such benefits have been maximised as much as possible.
- 5.3.3.2 The Project would create significant socio-economic beneficial effects through job creation from demand for labour and activity in supply chains locally and in the wider region over the 5-year construction and 35-year operational stages. A subsequent decommissioning stage is also expected to generate further employment opportunities in Scotland that could, to some degree, be filled by local people. No significant adverse effects on socio-economic receptors were identified.
- 5.3.3.3 During the construction phase of the Project, it is estimated that 75-80 FTEs would be created per year in the Western Isles, with a further 528-568 FTEs elsewhere in Scotland. During the operational and maintenance phase of the Project it is estimated that the Project could create or safeguard

175-188 FTE jobs per annum in the Western Isles and a further 349-375 FTE jobs per year elsewhere in Scotland. It is expected that operational and maintenance jobs would be in manufacturing' wholesale and retail; administrative and support services; professional, scientific and technical; and financial and insurance sectors. The Project will generate additional economic activity from expenditure along with increased employment, known as GVA. The level of GVA created by the Project in the construction phase is between £32m and £34m with £330m-£350 direct GVA during the operational and maintenance phase.

- 5.3.3.4 The operational and maintenance phase is anticipated to deliver a higher level of employment with enduring socio-economic benefits, improving workforce resilience and supporting. During this phase, long-term jobs at ports may provide structural benefits and economic stability for local communities.
- 5.3.3.5 The use of land and marine areas will mean they experience some disruption, with minor impacts expected in the aquaculture, shipping and commercial fishing sectors. Embedded mitigation measures are included that reduce adverse effects and enhance positive socio-economic outcomes.
- 5.3.3.6 The Offshore Project would be in accordance with policies GEN2 and GEN3 of Scotland's National Marine Plan (2015) and in accordance with Policy 11 of NPF4 (2023).
- 5.3.3.7 Furthermore, any minor impacts from the Offshore Project are balanced against the significant benefits and need for the Project, as set out in Section 4, and those benefits identified within this Section 5.3. This balance is detailed in Section 6 of this Planning Statement.

5.4 PHYSICAL AND COASTAL PROCESSES

5.4.1 SUMMARY OF KEY POLICY REQUIREMENTS

5.4.1.1 Relevant policy in relation to the Physical and Coastal Processes includes:

- Scottish National Marine Plan (2015):
 - GEN 8 provides guidance for how developments and activities in the marine environment should be resilient to coastal change and flooding and not have unacceptable adverse impact on coastal processes or contribute to coastal flooding.
 - GEN 9 requires development to comply with legal requirements for protected areas; not to result in significant impact on the national status of Priority Marine Features (PMFs) (which includes geodiversity features); and to protect, and, where appropriate, enhance the health of the marine area.
 - GEN 21 requires cumulative impacts affecting ecosystems to be addressed.
- Sectoral Marine Plan for Offshore Wind Energy (2020):

- The SMP list a number of key issues that need to be identified at the project level which include, but are not limited to, effects on subsea geology, sediments and coastal processes arising from changes in hydrodynamics and existing wave regimes.
- The Water Environment (Water Framework Directive) Regulations 2017:
 - The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, transposed the European Union (EU) Water Framework Directive (WFD) into UK law, focusing on the protection and improvement of water bodies, including coastal and estuarine waters.
- UK Marine Policy Statement (2011):
 - The UK Marine Policy Statement (2011) sets out high-level objectives for the marine space, including achieving a sustainable marine economy and identifies a wide range of relevant marine uses.

5.4.2 IMPACT ASSESSMENT

- 5.4.2.1 The physical and coastal processes assessment considers the effects of sediment disturbance, seabed change, and effects related to the presence of infrastructure, arising as a result of activities associated with the Offshore Project, such as cable and Wind Turbine Generator installation. These effects are considered on receptors including the surrounding coastline, sub-tidal seabed and designated sites of geological interest within a Zone of Influence defined by a spring tidal excursion ellipse, equal to an approximate 6 km offset from the Offshore Project Boundary. The modelling outputs undertaken as part of this assessment are incorporated into other technical topic assessments, such as benthic ecology. Data to inform the physical and coastal processes assessment has been gathered from a range of desk-based data sources and information gathered in a series of site surveys, including subtidal environmental characterisation, wind and metocean monitoring (including wave buoys) and bathymetric surveys.
- 5.4.2.2 The physical and coastal processes assessment provides the current baseline conditions within the Study Area for Bathymetry, Geology, Water levels, Waves, Tidal currents, Stratification, Seabed sediments and Sediment Transport Pathways. The baseline context incorporates desk-based data sources and modelling outputs, informed by site survey information.
- 5.4.2.3 The physical and coastal processes assessment considers climate change as the primary driver of future baseline conditions over the project lifetime, including predicted sea level rise, sea temperature and salinity changes, and extremes of weather. In line with relevant guidance, conservative climate projections are considered from UKCP18.
- 5.4.2.4 The assessment on marine and coastal processes in the EIAR **Chapter 9, Volume 2a** identifies that the construction phases will have the greatest potential for impact. The assessment identifies that mitigation embedded into the design will include measures such as micro-siting to reduce impacts on sensitive locations, scour protection and a Cable Installation Plan to identify the optimal route,

burial depths and techniques for the cable installation. The Outline Offshore Environmental Management Plans (O

- 5.4.2.5 OEMP) will also be used to ensure compliance with relevant legislation, best practice and guidance during the works. The assessment finds that sediment disturbance and seabed change from drilling works, cable burial and the Exit Pit construction will all lead to a low, adverse, magnitude of impacts because of the limited extent of disturbance created which will be within variances of the natural processes in this area. The assessment finds that the sensitivity of seabed and coastal receptors, including the North-West Coast of Lewis Geological Conservation Review (GCR) designation, is low, and therefore a low magnitude of change of a low sensitivity receptor would produce a negligible effect.
- 5.4.2.6 Therefore, when the embedded environmental measures to prevent, control and limit the potential for effects on receptors from physical marine and coastal processes during the lifetime of the Offshore Project are considered, the EIA finds that there are no significant effects anticipated.

5.4.3 PLANNING ASSESSMENT

- 5.4.3.1 Relevant policies set out criteria for the Offshore Project to protect geological assets and the water environment from adverse impacts, alongside requiring suitable enhancement measures as required to address potential impacts.
- 5.4.3.2 The Offshore Project has been well sited and designed to ensure it would not compromise important geodiversity and marine geology sites, with its landfall(s) carefully chosen to not compromise any sites designated for their nature conservation value (which may include geodiversity).
- 5.4.3.3 The Offshore Project includes a number of environmental measures, which are designed to minimise its potential effects on marine geology and oceanography, especially during the construction and decommissioning phase of the Project. The construction stage especially has a significant number of environmental measures. Examples such as the **Outline Offshore Environmental Management Plan, Volume 3** of the EIAR, would ensure the correct implementation of other environmental measures and ensuring construction is undertaken in accordance with good practice construction methods. The **Outline Offshore Environmental Management Plan, Volume 3** of the EIAR would ensure the potential for environmental effects resulting from the Offshore Project would be appropriately managed, including the careful management and mitigation of effects upon marine geology, oceanography and physical process receptors.
- 5.4.3.4 It is therefore considered that the Offshore Project would be in accordance with all policies related to physical and coastal processes, which are GEN8, GEN9 and GEN21 of Scotland's National Marine Plan (2015); Sectoral Marine Plan for Offshore Wind Energy (2020); The Water Environment (Water

Framework Directive) (England and Wales) Regulations 2017, transposed the European Union (EU) Water Framework Directive (WFD) into UK law; and the UK Marine Policy Statement (2011).

5.4.3.5 Furthermore, the effects of the Offshore Project are balanced against the significant benefits and need for the Offshore Project as set out in Section 4, with the planning balance detailed in Section 6 of this Statement

5.5 MARINE SEDIMENT AND WATER QUALITY

5.5.1 SUMMARY OF KEY POLICY REQUIREMENTS

5.5.1.1 Relevant policy in relation to Marine Sediment and Water Quality includes:

- Scottish National Marine Plan (2015):
 - GEN 9 requires development to comply with legal requirements for protected areas; not to result in significant impact on the national status of Priority Marine Features (PMFs); and to protect, and, where appropriate, enhance the health of the marine area;
 - GEN 12 Water Quality and Resources: Developments and activities should not result in a deterioration of the quality of waters to which the Water Framework Directive, Marine Strategy Framework Directive or other related Directives apply;
 - GEN 21 requires cumulative impacts affecting ecosystems to be addressed;
 - CABLES 1 requires developers to minimise impacts where possible on the natural environment from laying cables, and that proportionate assessment work should be undertaken which includes cable protection measures and mitigation plans;
 - CABLES 2 states that when making decisions on cable development proposals, consideration should be given to the minimisation of impacts on the environment and seabed.

5.5.2 IMPACT ASSESSMENT

5.5.2.1 The marine sediment and water quality assessment considers the effects of direct seabed disturbance, sediment mobilisation, change in blue carbon resources and effects related to the installation and presence of infrastructure, arising as a result of activities associated with the Offshore Project, such as cable and Wind Turbine installation, maintenance and decommissioning. These effects are considered on marine water quality and marine sediment quality, with a Study Area of a 6km tidal ellipse around the Offshore Project Boundary. Data to inform the marine sediment and water quality assessment has been gathered from a range of desk-based data sources and information gathered in a series of site surveys, including subtidal environmental characterisation.

5.5.2.2 The marine sediment and water quality assessment provides the current baseline conditions for the physical and chemical and biological parameters of water quality, the physical and chemical

parameters of marine sediment quality and the status of blue carbon resource within the Study Area. The south-west extent of the Offshore Project Boundary is located within the Water Framework Directive (WFD) designated coastal waterbody Gallan Head/Àird Uig to Butt of Lewis/*Rubha Robhanais*, ID 200476, which has a Water Classification Status of 'High'. Also, the WFD designated site of Loch Roag/*Loch Ròg*, ID 200205 is located approximately 5 km south-west and has a Water Classification Status of 'Good'. The baseline context incorporates desk-based data sources and modelling outputs, informed by site survey information.

- 5.5.2.3 The marine sediment and water quality assessment considers climate change as the primary driver of future baseline conditions over the project lifetime, including predicted sea level rise, sea temperature and salinity changes, and extremes of weather. In line with relevant guidance, conservative climate projections are considered from UKCP18.
- 5.5.2.4 The assessment on marine sediment and water quality in the EIA **Chapter 10 Marine Sediment and Water Quality, Volume 2a** identifies that the construction phase will have the greatest potential for impact. Effects will still occur during operations and decommissioning, but they will be lesser effects than at the construction phase.
- 5.5.2.5 The assessment identifies that mitigation embedded into the design will include measures such as a Cable Installation Plan to identify the optimal route, burial depths and techniques for the cable installation which would minimise sediment disturbance. An Outline Offshore Environmental Management Plan and Marine Pollution Contingency Plan will also be used to ensure compliance with relevant legislation, best practice and guidance during the works to minimise the risk of pollution incidents. The assessment finds that sediment disturbance and seabed change from drilling works, cable burial and the Exit Pit construction will all lead to a low, adverse, magnitude of impacts because of the limited extent of disturbance created which will be within variances of the natural processes in this area. The assessment finds that the sensitivity of the offshore area is low, with coastal receptors being of high sensitivity. A low magnitude of change of a low sensitivity receptor would produce a negligible effect, and with a high sensitivity receptor a minor adverse effect.
- 5.5.2.6 The EIA considers contaminants in the sediment and how these may be disturbed by works, potentially leading to pollution arisings. The assessment finds that for lead, nickel and mercury there will be no exceedance of the maximum allowable concentrations for sea waters. For arsenic, cadmium, copper and zinc, no maximum allowable concentrations are available. The arisings for these substances have been considered against the annual average concentrations, and all four substances fall below these concentrations. Due to the arisings identified, a negligible magnitude of change is identified. This would lead to negligible effects on both the low sensitivity offshore waters and high sensitivity coastal waters.
- 5.5.2.7 Disturbance of sediments can also release carbon, as organic carbon sources can be trapped within the sediments creating carbon storage. Using the calculated amounts of sediment disturbance, an

estimate of 14,583 tonnes of CO₂ that could be released has been made. This is a worst-case estimate and given the overall carbon savings which will result from the Project as a whole, it is considered to be a low, adverse, magnitude of change. Seabed carbon storage is identified as a high sensitivity receptor. Therefore, a minor adverse effect is found.

5.5.2.8 **Appendix 10.1 Water Framework Directive (WFD) Assessment and Technical Report, volume 2b** concludes that the Offshore Project will not cause deterioration in the status of any WFD water bodies assessed. The assessment demonstrates that, with embedded and additional mitigation measures in place, the potential impacts of construction, operation and maintenance, and decommissioning activities are small-scale, localised and temporary, remaining well below thresholds that would affect hydromorphological, biological (including habitats and migratory fish), water quality or invasive non-native species quality elements at the water body scale. No deterioration from High Status is predicted, and the Offshore Project will not prevent the achievement of WFD objectives for any screened-in coastal, river or loch water bodies. On this basis, the report concludes that the Offshore Project complies with WFD requirements and that an Article 4.7 derogation assessment is not required.

5.5.3 PLANNING ASSESSMENT

- 5.5.3.1 Relevant policies set out criteria for the Offshore Project to protect the marine environment from unacceptable adverse impacts as well as to deliver proportionate marine enhancement.
- 5.5.3.2 No significant effects would result from the Offshore Project on marine sediment and water quality. This is in part due to the Offshore Project location, the consideration given to its design and to the embedded environmental measures. When the embedded environmental measures to prevent, control and limit the potential for effects on marine sediment and water quality during the lifetime of the Offshore Project are considered, the EIA finds there will be no significant effects. This includes when considered with cumulative development considerations.
- 5.5.3.3 A number of the environmental measures, such as Marine Pollution Contingency Plan (MPCP), are currently outlined, which would be further updated into complete, final versions prior to the commencement of the development. This would aid in ensuring potential effects are kept to a minimum and to ensure identified environmental measures reflect the nature of the marine environment once development would commence throughout the Project.
- 5.5.3.4 Related to this topic are a significant number of environmental measures that would seek to monitor the Offshore Project to ensure it does not cause unforeseen effects to marine waters, especially regarding mitigation, the potential for pollution to occur and quickly addressing it should unforeseen pollution events occur. The Project is also keen to ensure it monitors its potential effects throughout its lifetime to ensure it does not compromise marine water and sediment quality, and unforeseen events or effects would be carefully managed and rectified, should they occur.

5.5.3.5 It is therefore considered that the Offshore Project would be in accordance with policies GEN 9, GEN12, GEN 21, CABLES 1 and CABLES 2 of Scotland's National Marine Plan (2015).

5.5.3.6 Furthermore, the effects of the Offshore Project are balanced against the significant benefits and need for the Offshore Project as set out in Section 4, with the planning balance detailed in Section 6 of this Statement.

5.6 BENTHIC AND INTERTIDAL ECOLOGY

5.6.1 SUMMARY OF KEY POLICY REQUIREMENTS

5.6.1.1 Relevant policy in relation to Benthic and Intertidal Ecology includes:

- Scottish National Marine Plan (2015):
 - GEN 5 requires reduction in human pressure and the safeguarding of ecosystem services
 - GEN 9 requires developments to comply with legal requirements for protected areas and protected species; not to result in significant impact on the national status of Priority Marine Features; and protect and, where appropriate, enhance the health of the marine area
 - GEN 10 supports opportunities to reduce the introduction of Invasive Non-Native Species (INNS) to a minimum or proactively improve the practice of existing activities. Codes of practice for INNS should be complied with.
 - GEN 13 states that development should avoid significant adverse effects of man-made noise and vibration, especially on species sensitive to such effects.
 - CABLES 2 states that when making decisions on cable development proposals, consideration should be given to the minimisation of impacts on the environment and especially the seabed; and
 - FISHERIES 1, FISHERIES 2 and FISHERIES 3 include a requirement to take account for the EU's Common Fisheries Policy, Habitats Directive, Birds Directive and Marine Strategy Framework Directive. Development and activities should take account of the potential impacts on Shellfish stocks and resultant fishing opportunities, fishing grounds commercially fished grounds and displacement of fish stocks, the socio-economic costs to fishers and their communities and other marine users.
- Sectoral Marine Plan for Offshore Wind Energy (2020):
 - The SMP list a number of key issues that need to be identified at the project level which includes:
 - Loss of/damage to marine and coastal habitats.
 - Effects from pollution releases on species and habitats; and
 - Effects on ecological status.

5.6.2 IMPACT ASSESSMENT

5.6.2.1 The benthic (habitats and organism on the seabed) and intertidal ecology assessment identifies Infaunal Benthic Ecology, Epifaunal Benthic Ecology, Shellfish Ecology and Blue Carbon as receptors within the suspended sediment Zone of Influence (spring tidal ellipse of 6km around the Offshore Project Boundary), and considers the effects associated with temporary (construction and decommissioning phases) and long-term (operation and maintenance phase) effects of:

- Disturbance to habitat
- Increase in suspended sediment concentration and turbidity
- Increase in sediment deposition from mobilised sediment
- Disturbance from underwater acoustic noise and vibration
- Horizontal Directional Drilling (HDD) employed at the cable landfall location, resulting in release of drilling fluid mud, drilling arisings or bentonite
- Protection of benthic habitats from fishing restrictions
- Removal of hard structures following decommissioning of the Offshore Project
- Introduction and colonisation of infrastructure by INNS

5.6.2.2 Data to inform the benthic and intertidal ecology assessment has been gathered from a range of desk-based data sources and information gathered in a series of site surveys, including subtidal environmental characterisation. The nearest site designated for receptors in relation to Benthic and Intertidal Ecology is Loch Roag Lagoons SAC, located approximately 6.8 km southwest of the Study Area. Loch Roag Lagoons SAC is a complex of silted lagoons. Tob Valasay, one of the lagoons, contains a diverse range of subtidal habitats. A range of communities are present including beds of eelgrass (*Zostera* spp.) and tasselweed (*Ruppia* spp.), turfs of marine algae and stands of large brown algae.

5.6.2.3 The assessment provides the current baseline conditions for benthic and intertidal habitats and the species which inhabit them, within the Study Area. The seabed across the Study Area is characterised by a range of substrata, including boulders and cobbles, pebbles and shingle, coarse sands, sands, fine sands, muds and mixed sediments. Protected habitats within the study area include Annex I Bedrock and/or Stony Reef, Kelp Bds, Tide-swept algal communities, Offshore Subtidal Sands and Gravels, and *Ophiothrix fragilis* and/or *Ophiocomina nigra* brittlestar beds on sublittoral mixed sediment. Commercially important species likely to be found within the study area include Norway lobster, common whelk, pink shrimp, squat lobster, razor clam, king scallop, brown crab, dog cockle, cuttlefish and edible sea urchin.

5.6.2.4 The assessment on benthic and intertidal ecology in the EIAR **Chapter 11 Benthic and Intertidal Ecology, Volume 2a** identifies that there is potential for impacts across all phases of the Offshore Project. However, the assessment identifies that embedded mitigation measures such as the development and use of a mitigation hierarchy; the use of best practice for seabed excavations; implementation of an Outline Offshore Environmental Management Plan (OOEMP); pre-

construction characterisation surveys; Cable Installation Plan; and micro-siting of infrastructure (for example avoiding the isolated pockets of soft sediments where practicable) will reduce the magnitude of impact of the above listed activities during construction and decommissioning to low or negligible. During operation and maintenance, the magnitude of impact for habitat loss/disturbance will be reduced to low or negligible through the implementation of embedded mitigation measures such as the micro-siting of infrastructure and the use of HDD beneath the intertidal zone to avoid sensitive areas where possible. Embedded mitigation measures such as the use of best practice for seabed excavations, an OOEMP and the use of the mitigation hierarchy, will reduce the magnitude of the impact from the increase in sediment concentration/deposition during operation activities to low.

- 5.6.2.5 The introduction of INNS is recognised as a potential risk during the Offshore Project from activities such as, but not limited to, increased vessel traffic, addition of subsea infrastructure and the import of materials. Of the high value habitats within the Study Area, the offshore subtidal sands and gravels, and brittlestar beds are the most sensitive to this with a medium sensitivity identified. An INNS Management Plan implemented for the lifetime of the Offshore Project will reduce the magnitude of impact from the introduction and colonisation by INNS to low/negligible, resulting in a not significant effect.

5.6.3 PLANNING ASSESSMENT

- 5.6.3.1 Relevant policies set out criteria for the Offshore Project to protect benthic, epibenthic and intertidal ecology from unacceptable adverse impacts as well as to deliver proportionate biodiversity/marine enhancement.
- 5.6.3.2 The Offshore Project would be designed and sited carefully to ensure it would result in as few potential effects as possible on identified benthic, epibenthic and intertidal ecology receptors. The avoidance of key sensitive habitats (where known) underpinned the design of the Project. The Offshore Project would further refine the siting of its elements through pre-construction surveys to ensure it would avoid areas containing any important benthic, epibenthic and intertidal ecology receptors that may have been previously unidentified.
- 5.6.3.3 It is acknowledged that there is potential for impacts across all phases of the Offshore Project. However, when the embedded environmental measures to prevent, control and limit the potential for effects on benthic and intertidal ecology during the lifetime of the Offshore Project are considered, there are no significant effects anticipated. The assessment identified no other developments which could result in a cumulative effect with the Offshore Project and as agreed with Scottish Ministers, transboundary impacts to benthic and intertidal ecology receptors were scoped out of the EIAR.

5.6.3.4 It is therefore considered that the Offshore Project would be in accordance with policies GEN 5, GEN 9, GEN 10, GEN13, CABLES 2, FISHERIES 1, FISHERIES 2 and FISHERIES 3 of Scotland's National Marine Plan (2015) and the SMP 2020.

5.7 MARINE AND NEAR SHORE ORNITHOLOGY

5.7.1 SUMMARY OF KEY POLICY REQUIREMENTS

5.7.1.1 Relevant policy in relation to Marine and Near Shore Ornithology includes:

- Scottish National Marine Plan (2015):
 - GEN 9 requires developments to comply with legal requirements for protected areas and protected species; not to result in significant impact on the national status of Priority Marine Features; and protect and, where appropriate, enhance the health of the marine area; and
 - GEN 21 requires cumulative impacts affecting ecosystems to be addressed.
- Sectoral Marine Plan for Offshore Wind Energy (2020):
 - The SMP list a number of key issues that need to be identified at the project level which includes: Risks to bird species, including collision risk and displacement, as well as potential impacts to birds on migratory pathways

5.7.2 IMPACT ASSESSMENT

5.7.2.1 The marine and near shore ornithology assessment considered potential effects on bird species from, effects on prey species, artificial lighting, collision risk, displacement, barrier effects and both temporary and long-term habitat loss and disturbance. It considers impacts on kittiwake, guillemot, razorbill, puffin, red-throated diver, great northern diver, great black-backed gull, herring gull, arctic tern, fulmar, manx shearwater, storm petrel, leach's petrel and gannet species which have all been identified as being regularly present in the Offshore Project Boundary, plus migratory species which may utilise the area on a less frequent basis.

5.7.2.2 Data to inform the assessment has been taken from desk top studies and site-specific digital aerial surveys. The assessment identified 65 designated sites with qualifying interests relevant to the study, with the **Offshore Report to Inform Appropriate Assessment (Offshore RIAA)** scoping 38 of these sites into the assessment. The **Offshore RIAA** is discussed further in Section 5.9. The baseline information identifies the times of year that the different species use the Offshore Project area (linked to pre-breeding, breeding, post-breeding and non-breeding activities) and the regional and national population sizes for the different species during these activity stages. It identifies that in the absence of the Offshore Project, the future baseline would likely see a continuation of a declining populations for the species identified, predominantly due to climate change impacts.

- 5.7.2.3 The assessment identifies 21 embedded mitigation measures that have been included within the Offshore Project and which will help to mitigate effects on bird species, which include various management plans for construction, operational and decommissioning works, the timing of construction works to avoid sensitive times of the year for bird species and the control of vessels movements during all phases of the Offshore Project.
- 5.7.2.4 The assessment concludes that with the embedded mitigation measures proposed, no significant effects are identified on the ornithological species identified either from the Offshore Project as an individual development, or when considered cumulatively with other developments.

5.7.3 PLANNING ASSESSMENT

- 5.7.3.1 Relevant policies set out criteria for the Offshore Project to protect marine and near shore ornithology from unacceptable adverse impacts.
- 5.7.3.2 The Offshore Project would be designed and sited carefully to ensure it would result in as few potential effects as possible on identified bird species. The locational design and the management of impacts during all phases of the Offshore Project have been developed to minimise potential effects on bird species, and information available will be reviewed prior to construction to ensure the work avoids any specifically sensitive locations when considering construction and micro-siting.
- 5.7.3.3 It is acknowledged that there is potential for impacts across all phases of the Offshore Project. However, when the embedded environmental measures to prevent, control and limit the potential for effects on marine and near shore ornithology during the lifetime of the Offshore Project are considered, there are no significant effects anticipated. The assessment identified no other developments which could result in a cumulative effect with the Offshore Project.
- 5.7.3.4 It is therefore considered that the Offshore Project would be in accordance with policies GEN 9 and the SMP 2020.

5.8 FISH ECOLOGY AND MARINE MAMMALS

5.8.1 SUMMARY OF KEY POLICY REQUIREMENTS

- 5.8.1.1 Relevant policy in relation to Fish Ecology and Marine Mammals includes:
- Scottish National Marine Plan (2015):
 - GEN 9 requires developments to comply with legal requirements for protected areas and protected species; not to result in significant impact on the national status of Priority Marine Features; and protect and, where appropriate, enhance the health of the marine area
 - GEN 13 states that development should avoid significant adverse effects of man-made noise and vibration, especially on species sensitive to such effects; and

- GEN 21 requires cumulative impacts affecting ecosystems to be addressed.

5.8.2 IMPACT ASSESSMENT

Fish Ecology

- 5.8.2.1 The fish ecology assessment considers marine fish, and diadromous fish and Freshwater Pearl Mussels as receptor groups, with an appropriate Study Area defined for each receptor group. Marine species are those which live only in the ocean (demersal, pelagic, elasmobranch (sharks, skates and rays)). Diadromous fish are those species which have life stages in both freshwater environments and sea water (Atlantic salmon, seatrout and European eel) and Freshwater Pearl Mussels rely on diadromous fish species to support a stage in their lifecycle. The assessment considers the effects associated with construction and decommissioning (temporary impacts), and operation and maintenance (long term impacts) phases, including:
- All phases:
 - Seabed habitat loss and/or disturbance.
 - Increases in suspended sediment concentration and associated sediment deposition.
 - Construction only
 - Underwater noise and vibration (impulsive from piling operations).
 - Underwater noise and vibration (continuous from vessel operations).
 - Release of drilling muds during trenchless construction.
 - Operation and maintenance only:
 - Continuous underwater noise and vibration from WTGs and vessel operations.
 - Electromagnetic Field (EMF) generated through the subsea electrical cabling.
 - Fish aggregation effects due to the presence of infrastructure in the water column and on the seabed.
- 5.8.2.2 Data to inform the fish ecology assessment has been gathered from a range of desk-based data sources and information gathered in a series of site surveys. These included the collection of environmental DNA (eDNA), a juvenile salmonid acoustic fish tracking study, and baited remote underwater video (BRUV) sampling. Additionally, data from surveys carried out for benthic ecology and marine mammal baselines were used to inform the Fish Ecology baseline. Digital Aerial Surveys (DAS), conducted primarily for birds and marine megafauna, also recorded incidental detections of fish or fish-related activity.
- 5.8.2.3 Numerous marine fish species were recorded within the Marine Fish Study Area, including ten pelagic species, such as Atlantic mackerel, 74 demersal species, such as Atlantic cod and 22 elasmobranch species, such as basking shark, with potential spawning and nursery grounds for particular species also identified. Diadromous fish spend part of their life in both freshwater and sea water, migrating between the two biotopes. Based on the review of desktop sources it is

expected that Atlantic salmon, Sea trout and European eel may be present within the Diadromous Fish Study Area.

- 5.8.2.4 The assessment on fish ecology in the EIAR **Chapter 12 Fish Ecology, Volume 2a** identifies that the construction phase will have the greatest potential for impact. Effects will still occur during operations and decommissioning, but they will be lesser effects than at the construction phase.
- 5.8.2.5 The Offshore Project includes measures embedded in the design that give clear and demonstrable regard to the protection of Atlantic salmon through targeted piling mitigation measures. These have been developed with stakeholder engagement and include restricting percussive piling to defined areas of the site, limiting hammer energy through spatial zoning, committing to noise abatement to reduce underwater sound levels, and applying temporal controls to minimise overlap with sensitive migration periods.
- 5.8.2.6 The fish ecology assessment identifies a significant effect on the temporary threshold shift (TTS) of Atlantic Salmon during construction because of the remaining underwater noise and vibration. The magnitude/risk of noise that might lead to TTS has been assessed as medium. Thus, the significance of potential TTS effects is assessed as moderate (potentially significant). As effects on Atlantic salmon are considered to be potentially significant, effects on Freshwater Pearl Mussels are likewise considered moderate due to its life stage dependence on these diadromous fish species. Additional mitigation is therefore proposed, which will result in a minor and not significant effect.
- 5.8.2.7 During operation and maintenance, the magnitude of impacts from EMF generated through the subsea electrical cabling on elasmobranch (sharks, skates and rays) and other marine fish, and diadromous fish is assessed as being low. This is due to the embedded mitigation to implement a Cable Installation Plan which will use outputs from project specific geophysical surveys and a formal Cable Burial Risk Assessment to increase burial depth of cables and reduce impacts on fish. Fish aggregation impacts during operation are considered to incur a low magnitude of impact on marine fish and diadromous fish. Despite Atlantic salmon and European eel being identified as high sensitivity receptors, the behavioural patterns of these species are quick moving, and the significance of effect is not significant. As such, no mitigation is required for impacts from fish aggregation on marine fish and diadromous fish.

Marine Mammals

- 5.8.2.8 The marine mammals' assessment considers cetaceans (toothed whales and baleen whales) and pinnipeds (seals) as receptors, within the Marine Mammal Study Area, which is composed of the Array Area plus Offshore Cable Area of Search (OCAS) plus a 100km buffer. For underwater noise impact pathways which cover a greater extent, the assessment uses defined Marine Mammal Management Units and Seal Monitoring Units. The receptors assessed in the marine mammals' assessment include the cetaceans Odontocetes (toothed whales) and Mysticetes (baleen whales), and Pinnipeds (seals and relatives). The assessment considers the effects on these receptors associated with construction, operation and maintenance, and decommissioning phases, including:

- All phases:
 - Accidental release of pollutants.
 - Increase in suspended sediment concentration and reduction in water quality.
 - Indirect effects of impacts on prey availability.
 - Vessel collision.
- Construction and decommissioning:
 - Auditory injury from piling and construction noise.
 - Disturbance from piling noise and other construction noise.
 - Temporary habitat loss from presence of vessels.
- Operation and maintenance only:
 - Disturbance from turbine noise and other operational noise.
 - Barrier effects from infrastructure allocated with the Offshore Project.
 - Long term change in habitat and foraging opportunities.

5.8.2.9 Data to inform the marine mammals' assessment has been gathered from a range of desk-based data sources and information gathered in a series of site surveys, including a suite of 24 monthly surveys to collect baseline data on seabirds, marine mammals and other megafauna, and a 12-month Passive Acoustic Monitoring (PAM) campaign to collect additional baseline data on marine mammals. The west coast of Scotland/Alba is a globally important region for cetaceans with 24 species being recorded within Hebridean waters, and 15 of these being recorded annually. The most frequently observed cetacean species off the coast of northwest Lewis/Leòdhais include harbour porpoise, white-beaked dolphin, common dolphin, common bottlenose dolphin, Risso's dolphin and minke whale. There are two resident species of pinniped in Scotland/Alba, the harbour seal and the grey seal. Both species are present throughout the Outer Hebrides/Na h-Eileanan Sià, including the northwest coast of the Isle of Lewis/Eilean Leòdhais. Grey seal are present in higher numbers than harbour seal throughout the Western Isles Seal Monitoring Unit (SMU).

5.8.2.10 Marine mammals are particularly sensitive to underwater noise and use sound for communication, foraging, predator detection, and navigation. However, the assessment identified that the application of noise abatement mitigation prevents animals from receiving auditory injuries. The OEMP and mitigation measures associated with Underwater Noise will be defined in a Marine Mammal Mitigation Protocol (MMMP) and are included as embedded mitigation to ensure compliance with relevant legislation, best practice and guidance during the construction and operation of the works.

5.8.2.11 Potential impacts from vessel collision and disturbance or temporary habitat loss from the presence of vessels will be managed through embedded mitigation comprising adherence to requirements of the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78/ provided within the MCPC; marine coordination and communication to manage Offshore Project vessel movements; and compliance of all Offshore Project vessels with international marine regulations.

- 5.8.2.12 The Offshore Project's embedded mitigation measures during construction include the development of a OOEMP and adherence to industry best practice with regard to accidental release of contaminants through sediment disturbance and best practice techniques for seabed excavations to reduce the impact of increases in suspended sediment concentration and reduction in water quality. The MCPC will be in place to reduce the accidental release of pollutants.
- 5.8.2.13 During operations, the physical presence of Offshore Project infrastructure, noise from operational activities, and underwater noise from vibration of operating turbines has the potential to cause long-term changes in habitat and foraging opportunities, which could displace marine mammals and reduce the amount of available foraging opportunities. The diet of marine mammals tends to be varied, and all species considered in this assessment have a generalist diet and forage on a variety of prey species. The embedded mitigation measures such as, but not limited to, stakeholder engagement relating to Underwater Noise; adherence to industry best practice with regard to accidental release of contaminants through sediment disturbance; and best practice techniques for seabed excavations will help reduce long-term changes in habitat and foraging opportunities.
- 5.8.2.14 Disturbance from turbine noise has the potential to impact marine mammals however any effects on animals are expected to be short-term and are unlikely to influence individuals' ability to carry out activities such as foraging and resting. Seals are less sensitive to operational noise compared to marine mammals in other hearing groups; however, disturbance may occur where noise levels are above ambient noise. Seals have been recorded regularly using offshore wind farms for foraging and therefore may benefit from increased foraging opportunities.
- 5.8.2.15 Offshore Project activities carried out during the decommissioning phase will largely be a reversal of activities carried out during the construction phase. Therefore, the magnitude and sensitivity assessments for the construction phase can also be applied to decommissioning.

5.8.3 PLANNING ASSESSMENT

Fish Ecology

- 5.8.3.1 Relevant policies set out criteria for the Offshore Project to protect fish species and habitats from unacceptable adverse impacts as well as to deliver proportionate relevant enhancement to offset adverse impacts.
- 5.8.3.2 The construction and operational and maintenance phases of the Offshore Project would have potential effects on a wide range of fish receptors. The level of effects identified reflects the carefully sited and well-designed nature of the Project. When the embedded and additional environmental measures to prevent, control and limit the potential for effects on fish ecology during the lifetime of the Offshore Project are considered, the EIA finds there will be no significant effects. No significant cumulative effects or transboundary effects have been identified in relation to the Offshore Project on fish ecology from construction, operation and maintenance, and decommissioning activities.

Marine Mammals

- 5.8.3.3 Relevant policies set out criteria for the Offshore Project to protect marine mammals from unacceptable adverse impacts, including the enhancement of the marine environment and its habitats.
- 5.8.3.4 The Offshore Project has been sited and designed to reduce its potential effects on marine mammals. The location of cabling associated with the Offshore Project would be constructed in carefully considered areas to ensure they would cause little disturbance to marine mammals and would be a of sufficient depth to avoid re-emergence. Furthermore, associated vessel travel trips associated with the Offshore Project across all of its stages would be managed to ensure vessels carried out required works in a manner that reduced the risks to marine mammals. The adoption of these mitigation measures means that there will be no significant effects on marine mammals across all stages of the Project. The breadth and scale of the environmental measures, alongside the detailed design and assessment work associated with the Project, is considered to demonstrate that the Offshore Project has considered its potential effects and maximised its opportunities to mitigate them. For example, the **Outline Marine Mammal Mitigation Protocol, Volume 3** of the EIAR, would ensure the risk of injury to marine mammals from piling, UXO clearance, and pre-construction surveys is minimised.
- 5.8.3.5 No significant cumulative effects or transboundary effects have been identified in relation to the Offshore Project on marine mammals from construction, operation and maintenance, and decommissioning activities. It is therefore considered that the Offshore Project would be in accordance with policies GEN 9, GEN13 and GEN 21 of Scotland's National Marine Plan (2015).
- 5.8.3.6 Furthermore, the effects of the Offshore Project are balanced against the significant benefits and need for the Offshore Project as set out in Section 4, with the planning balance detailed in Section 6 of this Statement.

5.9 APPROPRIATE ASSESSMENT UNDER THE HABITATS REGULATIONS

- 5.9.1.1 The topics under Sections 5.6, 5.7 and 5.8 are all relevant to the considerations needed under the Habitats Regulations¹. Policy GEN 9 of the Scottish National Marine Plan (2015) requires developments to comply with legal requirements for protected areas and protected species. Policy 4 of NPF4 states that development proposals that are likely to have a significant effect on European site, and are not directly connected with or necessary to their management, are required to be subject to an appropriate assessment of the implications for the conservation objectives.

¹ The Conservation (Natural Habitats, &c.) Regulations 1994 (As Amended), The Conservation of Habitats and Species Regulations 2017 and The Conservation of Offshore Marine Habitats and Species Regulations 2017.

- 5.9.1.2 Where a development may adversely affect the integrity of a European site², the Habitats Regulations state that where likely significant effects on European sites cannot be ruled out, an Appropriate Assessment is required to determine whether those effects may affect the integrity of the relevant European site. An Appropriate Assessment will be made by the competent Authority, in this case by Scottish Ministers. Information has however been specifically provided with the Offshore Project applications to aid Scottish Ministers in this determination. To this end, the **Offshore RIAA** considers whether the Offshore Project will have an adverse effect on the integrity of any protected European site, either alone or in combination with other plans or projects. The assessment considers the construction, operation and maintenance (O&M), and decommissioning phases of the offshore aspects of the Project. Should there be a need for the Competent Authority to progress past the AA stage, information is provided separately within the **Offshore Project: HRA Derogation Case**, and **Offshore Project: HRA Compensation Plan Roadmap** that accompanies the **Offshore RIAA**.
- 5.9.1.3 The **Offshore RIAA** considers 38 European sites which have been screened into the assessment due to identified or potential connectivity. It finds that for 30 of these European Sites, covering potential impacts on benthic and intertidal ecology, marine mammals, migratory fish and freshwater pearl mussel, and marine and nearshore ornithology there would be no adverse effect on the integrity (AEOI) of the sites.
- 5.9.1.4 For all 38 sites screened in, the **Offshore RIAA** finds that there would be no AEOI from the Offshore Project alone. The **Offshore RIAA** also finds that for the majority of sites and features there would also be no AEOI when considered in combination with other projects or plans, with the following exceptions for where there is potential for an in-combination AEOI or where an AEOI cannot be ruled out:
- East Caithness Cliffs SPA – kittiwake (and breeding seabird assemblage) from displacement, collision and combined displacement and collision;
 - Flamborough and Filey Coast SPA - kittiwake (and breeding seabird assemblage) from displacement, collision and combined displacement and collision;
 - Forth Islands SPA – gannet (and breeding seabird assemblage) from collision and combined displacement and collision;
 - North Caithness Cliffs SPA – kittiwake (and breeding seabird assemblage) from combined displacement and collision;
 - Outer Firth of Forth and St Andrews Bay Complex SPA – gannet (and breeding seabird assemblage) from collision and combined displacement and collision;
 - Seas off St Kilda SPA – razorbill (and breeding seabird assemblage) from displacement;
 - St Kilda SPA – razorbill (and breeding seabird assemblage) from displacement;

² European sites are defined as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Proposed SPAs (pSPAs) and proposed SACs (pSACs), are also afforded the same legal protection as fully designated sites.

- West Westray SPA - kittiwake (and breeding seabird assemblage) from displacement and combined displacement and collision.

5.9.1.5 These potential AEOI are however considered to be extremely small, being mortality of less than one individual bird per annum, per European site.

5.9.1.6 For the potential AEOI identified, the **Offshore Project: HRA Derogation Case** identifies that there are no other alternative solutions that could meet the Project Objectives, and therefore there are no alternatives to the Offshore Project. This works considers that:

- A Do Nothing alternative would not generate the renewable energy needed by Scottish and UK level policy and legislation.
- Alternative locations either would not meet the requirement for Scottish renewable energy generation and associated supply chain to be developed (if outside of Scottish Exclusive Economic Zone), or all alternative locations within the Scottish Exclusive Economic Zone are already allocated to other developments.
- Alternative designs would compromise the generating capacity of the Offshore Project.

5.9.1.7 As there is potential AEOI and no feasible alternative solutions, the **Offshore Project: HRA Derogation Case** goes onto present imperative reasons of overriding public interest (IROPI) for the project. If Scottish Ministers proceed on the grounds of IROPI then it is necessary to secure any compensatory measures necessary to ensure the overall coherence of the European sites. Information on compensatory measures is provided within the **Offshore Project: HRA Compensation Plan Roadmap**.

5.9.1.8 The IROPI case identifies that Offshore Project will be required in order to achieve legally binding decarbonisation targets at both a Scottish and UK level, with the rapid mobilisation of established technology capable of generating an estimated potential 900 MW of renewable energy. The Offshore Project makes use of one of the limited potential locations for fixed-bottom offshore wind, providing certainty for the future energy supply. The Project provides an opportunity for the benefits of a just transition to a net zero society to be expanded into the west coast of Scotland, using a proven and reliable technology for which there is a proven supply chain. The placement of the Project off the coast of Lewis will provide an opportunity for Western Isles communities and businesses to benefit economically from the Project. The **Offshore Project: HRA Derogation Case concludes** that if Scottish Ministers conclude, or cannot rule out, AEOI then there is an irrefutable need for the Offshore Project to be developed for reasons of IROPI, as the benefits outweigh the risks of any adverse effects on these sites.

5.10 CLIMATE RESILIENCE AND GREENHOUSE GASES

5.10.1 SUMMARY OF KEY POLICY CONSIDERATIONS

Climate Resilience

5.10.1.1 Relevant policy in relation to Climate Resilience includes:

- Scottish National Marine Plan (2015):
 - GEN 5 requires decision makers to act in the way best calculated to mitigate and adapt to climate change and they should be satisfied that there is sufficient regard to the changing climate in development proposals. This includes giving particular regard to the vulnerability, scale and longevity of the proposed operation. Assessments and any proposed mitigation measures should be based on the best scientific evidence available at the time.
- NPF4 (2023)
 - Policy 2 states that proposals will be sited and designed to adapt to current and future risks from climate change. The intent of the policy is stated as being to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change.

Greenhouse Gases

5.10.1.2 Relevant policy in relation to Greenhouse Gases includes:

- Scottish National Marine Plan (2015):
 - GEN 5 requires decision makers to seek to facilitate a transition to a low carbon economy and they should consider ways to reduce emissions of carbon and other greenhouse gases. Development should safeguard ecosystem services such as natural carbon sinks.
- NPF4 (2023)
 - Policy 2 states that proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.

5.10.2 IMPACT ASSESSMENT

Climate Resilience

5.10.2.1 The Climate Resilience assessment considers the impact of climate change on the Offshore Project and its associated infrastructure and activities. The Climate Resilience assessment methodology is set out into two stages:

- The Climate Vulnerability Assessment considers the vulnerability of identified receptors to climate hazards across the Offshore Project's lifetime. The vulnerability of the receptors

depends on the sensitivity and exposure of the receptors to climate trends identified within the future baseline.

- Potentially significant effects are considered where receptors of 'medium' vulnerability to climate hazards are identified and taken forward to the Climate Resilience assessment. These climate hazards were storms and winds, ocean acidification and sea-level rise.
- The Climate Resilience assessment, used to assess the likelihood and the consequence (magnitude of climate change impacts) to determine the significance of the effect, with due consideration of appropriate embedded measures.

5.10.2.2 The impacts of climate change on sea level rise, temperature, salinity and extreme weather are considered within the future baseline of the physical and coastal processes assessment and climate change is also assessed as part of the greenhouse gases assessment.

5.10.2.3 According to the latest State of the UK Climate Report the UK's climate is changing, with recent decades warmer, wetter, and sunnier than the 20th century on a national and local scale. The Climate Resilience assessment considers the current baseline of climate variables (1991 – 2020) and the future baseline, which utilises the Climate Risk Indicators (CRI) tool, which considers the UK Climate Projections 2018 (UKCP18) across the Offshore Project lifetime, at the local authority level of the Western Isles/Na h-Eileanan.

5.10.2.4 The Offshore Project has been designed to take into account the risk of high winds and storms, ocean acidification and sea level rises through the construction, operational and maintenance and decommissioning phases of the Project. Wind speed analysis, suitability of equipment and designs against industry standards, seasonal timing of offshore works and the use of a monitoring and maintenance regime have been incorporated to manage these risks

5.10.2.5 The Climate Resilience assessment looks at the potential impacts of environmental change on the Offshore Project, rather than impacts of the Offshore Project on the environment. As such the receptor is the Offshore Project. As there are no receptors in common with other assessments, no assessment of cumulative effects is undertaken. Similarly, no transboundary effects are anticipated on the basis that climate change adaptation effects and impacts are specific to the Offshore Project.

5.10.2.6 The design, with its embedded mitigation, means that the EIA finds there are no significant effects in relation to Climate Resilience during the construction, operational and maintenance or decommissioning phases. It is therefore considered that the Offshore Project would be in accordance with policies GEN 5 of Scotland's National Marine Plan and Policy 2 of NPF4.

Greenhouse Gases

5.10.2.7 The Greenhouse Gas (GHG) assessment considers the impact of the proposed Offshore Project with respect to GHG emissions that may arise during construction, operation, maintenance and decommissioning. The assessment presents the worst-case scenario, based on design parameters

that are forecast to produce the highest carbon impacts. The assessment of GHG emissions is not restricted by geographical area, instead focussing on any increase or decrease in emissions as a result of the Offshore Project, wherever that may be. This includes:

- Construction emissions, including manufacturing and transport of materials.
- Operation emissions, including shifts in energy use, and materials and waste from operation and maintenance.
- Decommissioning emissions, which are assumed to be similar to construction and include the plant use and transport emissions from materials and labour.

5.10.2.8 The baseline focuses on those emissions sources subject to change between the baseline and the Offshore Project. There is no development/activity on site at present, and, on this basis, the existing baseline emissions are zero. The GHG assessment methodology follows the PAS 2080 guidance covering the 'before use,' 'use,' and 'end of life' stages of the infrastructure lifecycle to estimate the GHG emissions throughout the Offshore Project's lifecycle. The assessment baseline for GHG emissions in Scotland/Alba is established using the Climate Change (Scotland) Act 2009, as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. The future baseline for GHG emissions in Scotland/Alba considers the impact of relevant Scottish Government policies throughout the project's lifetime and aligns with the established UK carbon budget trajectory.

5.10.2.9 The global atmosphere is the receptor for the effects on the climate of GHG emissions arising from the Offshore Project. The impacts of GHG emissions relate to their contribution to global warming and climate change. These impacts are global and cumulative in nature, with every tonne of GHG emissions contributing to impacts on natural and human systems. GHG emissions result in the same global effects wherever and whenever they occur and, therefore, the sensitivity of different human and natural receptors is not considered.

5.10.2.10 The assessment on GHG emissions in the EIAR (**Chapter 8: Greenhouse Gases, Volume 2a**) identifies that the Offshore Project will not result in a significant effect. As part of the Offshore Project design process, several embedded mitigation measures were adopted to reduce the potential for impacts on GHG emissions. The EMP will include measures to reduce GHG emission during the construction phase and define measures to reduce embodied carbon in construction materials and encourage circular economy principles. The Cable Installation Plan will ensure the material and associated plant use are minimised during construction. Marine coordination and communication to manage Offshore Project vessel movements will be implemented to minimise emissions, and the Construction Worker Plan will promote low-carbon transport options. The assessment identifies that the GHG emissions during the construction phase will therefore contribute 0.255% to the Fifth Carbon Budget period and 0.091% to the Sixth Carbon Budget. This is considered a negligible contribution and is assessed as minor adverse.

5.10.2.11 The operation phase of the Offshore Project (2033-2068) falls within the Sixth Carbon Budget period (2033-2037) only. The GHG emissions during the operational phase contribute 0.0022% to the Sixth Carbon Budget period and is assessed as minor adverse. The Offshore Project will continue to offset GHG emissions throughout its operational life and therefore make a positive contribution to the UK Government target to reach net zero emissions in 2050. At decommissioning, it is anticipated that a considerable amount of wind farm components would be recycled or repurposed, which, although involving some emissions from processing, is expected to result in a net reduction in greenhouse gas emissions compared to disposal or use of virgin materials. As such, the effect on climate change is assessed as minor adverse relative to a no-project baseline but represents a more sustainable end-of-life approach.

5.10.3 PLANNING ASSESSMENT

Climate Resilience

- 5.10.3.1 Relevant policies set out a need for the Offshore Project to ensure it would be resilient to the ongoing and emerging effects of climate change.
- 5.10.3.2 The Offshore Project seeks to ensure it would maximise its ability to weather the ongoing and emerging effects of climate change. This is demonstrated in **Chapter 7: Climate Resilience, Volume 2a** of the EIAR identifying no significant effects from this topic, with potential effects identified primarily being 'very unlikely' or 'unlikely'. Where there is the potential for effects, these would manifest in terms of having a Minor (not significant) effect.
- 5.10.3.3 The environmental measures associated with climate resilience, and the **Outline Offshore Environmental Management Plan, Volume 3** of the EIAR especially, would ensure the Offshore Project maximises its climate resilience.
- 5.10.3.4 Potential effects resulting from the ongoing and emerging effects of climate change in the construction and decommissioning stages is primarily confined to disruption in construction / decommissioning activities. Such effects would continue to be managed in a safe fashion for workers and visitors to site, such as through the careful monitoring of weather forecasts, ensuring health and safety is prioritised during the construction and decommissioning stages and allowing for the pausing of work, if needed, should severe flooding or storm events occur. Plant and machinery and resources would be secured sensibly to ensure they do not become problematic or damaged during the events of severe flooding or storms. It is important to note that high temperatures that could cause an increase in the occurrence of heat related human health issues, and these would also be managed.
- 5.10.3.5 Across all stages of the Project, work would be managed in accordance with strategies to ensure emergency procedures and access arrangements are in place, and known by workers and visitors, in the case of severe weather or flooding events or what to do if people experience the effects of

temperature related issues. Works required across the stages would also be broadly programmed to avoid forecast extreme weather to reduce the Project's potential exposure to such events.

- 5.10.3.6 Elements of the Offshore Project have been designed to minimise their vulnerability to the ongoing and emerging effects of climate change, with the cabling associated with the Offshore Project being buried in accordance with a Cable Burial Risk Assessment to better ensure cabling is not disturbed by extreme weather events. It has also been designed to be safe during the operational and maintenance phase of the Project, such as through the WTGs being designed to ensure they could withstand predicted temperature rises and fluctuations. This would aid in ensuring that workers attending the Offshore Project during this phase are safe. Similarly, environmental measures during the decommissioning phase of the Offshore Project would ensure these works are carried out in a manner that is safe for workers and would reduce the adverse effects from weather events.
- 5.10.3.7 It is therefore considered that the Offshore Project would be in accordance with policy GEN 2 of Scotland's National Marine Plan and in accordance with Policy 2; Climate Mitigation and Adaption of NPF4.
- 5.10.3.8 Furthermore, the effects of the Offshore Project are balanced against the significant benefits and need for the Project, as set out in Section 4, with the planning balance detailed in Section 6 of this Planning Statement.

Greenhouse Gases

- 5.10.3.9 Relevant policies set out criteria to ensure the Offshore Project would minimise its contribution to the generation of GHGs and are supportive of renewable energy development.
- 5.10.3.10 The Offshore Project would deliver approximately 49,798 GWh of electricity production that would directly contribute to decarbonisation of the UK national electricity network and wider UK net zero targets. Overall, therefore, the Offshore Project would deliver significant benefits to the UK, whilst ensuring it minimises the levels of GHG generated over the Project's lifetime.
- 5.10.3.11 Through its supporting environmental measures, the Project would commit itself to maximising the potential to reduce lifecycle GHG emissions, including those at construction stage, as managed by the supporting Outline CEMP. Given the significant contribution of its electricity generation over the Project lifetime, it is expected to offset its lifecycle emissions after 10 years of its operational life, with a net carbon saving of 2,046,701 (tCO₂e/year). This further demonstrates the Project's contribution to GHG reduction.
- 5.10.3.12 When constructing, operating and decommissioning energy infrastructure it is inevitable that there would be a release of GHG to the atmosphere. However, the Project has been designed to minimise emissions, such as embedding environmental measures within the Project that limit emissions. As such, the GHG emissions are assessed to be Minor Adverse (Not Significant).

5.10.3.13 It is therefore considered that the Project would be in accordance with policy GEN 2 of Scotland's National Marine Plan and in accordance with Policy 2; Climate Mitigation and Adaption of NPF4.

5.10.3.14 Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project, as set out in Section 4, and the planning balance detailed in Section 6 of this Planning Statement.

5.11 COMMERCIAL FISHERIES

5.11.1 SUMMARY OF KEY POLICY REQUIREMENTS

5.11.1.1 Relevant policy in relation to Commercial Fisheries includes:

- Scottish National Marine Plan (2015):
 - FISHERIES 1 – seeks to ensure Scotland's commercial fish stocks are exploited responsibly to secure long-term environmental and economic sustainability.
 - FISHERIES 2 – demonstrates the need to develop and maintain a Scottish fishing fleet recognised internationally as a leader in sustainable fishing practices, while ensuring it remains economically resilient.
 - FISHERIES 3 -seeks to ensure that Scotland's sea fisheries industry maximises the sustainable economic value of its activities while supporting food security and responsible resource use.

5.11.2 IMPACT ASSESSMENT

5.11.2.1 The commercial fisheries assessment considers the likely significant effects of the Offshore Project with respect to commercial fisheries, which are defined as fishing activity legally undertaken where the catch is sold for taxable profit. The assessment considers the relevant effects associated with the construction, operation and maintenance, and decommissioning phases on all relevant fishing fleets, including:

- Reduction in access to, or exclusion from established fishing grounds
- Displacement leading to gear conflict and increased fishing pressure on adjacent grounds
- Displacement or disruption of commercially important fish and shellfish resources
- Increased vessel traffic associated with the Project within fishing grounds leading to interference with fishing activity
- Additional steaming to alternative fishing grounds - all other fleets
- Physical presence of infrastructure leading to gear snagging

5.11.2.2 During the construction phase of the Array Area, including up to 60WTG's, 1 OSP and 180km length of Array Cables, commercial fisheries will be prevented from fishing where construction activities are taking place, plus up to 500m safety zones around infrastructure under construction

or up to 500m advisory exclusion zone for vessels. The total construction duration for the offshore infrastructure will be up to 5 years, with a number/range of construction activities being undertaken simultaneously across the site.

- 5.11.2.3 The construction impact will lead to a reduction in access to or exclusion from fishing grounds and the fish and shellfish resources within the grounds overlapping the Array Area for a range of fishing opportunities during the period of construction. The impact is of relevance to a range of fishing fleets. The potential reduction in access to, or exclusion from established fishing grounds within the Array Area was predicted to result in impacts that could be considered significant in EIA terms and further mitigation was proposed.
- 5.11.2.4 Following the implementation of mitigation measures outlined in **Chapter 21: Commercial Fisheries, Volume 2a** of the EIAR it was predicted that the residual impacts during construction was reduced to minor adverse, which is not significant in EIA terms.

5.11.3 PLANNING ASSESSMENT

- 5.11.3.1 N4 was identified as a suitable area for offshore wind development through an iterative spatial selection and refinement process which included strategic-level assessments, including on fisheries interests, and stakeholder engagement, including with fisheries groups.
- 5.11.3.2 The strategic decision to undertaken offshore wind leasing in Plan Option N4, which forms the Project's OAA, was taken at an earlier stage by Scottish Ministers prior to N4 being awarded to the Applicant. This should be recognised within the determination of the offshore consenting applications for the Project. In turn, the Project needs to work within the spatial constraints of N4 and consider whether potential significant impacts can be further mitigated at project level whilst ensuring the Project remains viable and continues to achieve all of its project objectives.
- 5.11.3.3 Relevant policies set out criteria for the Project to protect commercial fisheries from unacceptable adverse impacts as well as to demonstrate how the Project has minimised any adverse impacts.
- 5.11.3.4 It is acknowledged that the Project would cause disruption to local commercial fisheries that rely on being able to fish within the OAA and export cabling corridors.
- 5.11.3.5 However, the Project would seek to ensure as little established fishing grounds are lost as possible. In support of this, the construction stage of the project would utilise a detailed phasing strategy over the 5 years of construction, which would outline how the construction of the Project would be phased in order to further reduce potential effects upon commercial fishery activities. Advance warning and accurate location details of construction, maintenance and decommissioning operations, associated Safety Zones and advisory passing distances, will be given via Notice to Mariners Kingfisher Bulletins to ensure the Project does not pose a threat to commercial fishery associated vessels at any stage.

- 5.11.3.6 This would be further supported by a Safety Zone Statement and **Outline Navigational Safety and Vessel Management Plan, Volume 3** of the EIAR, which would further aid in ensuring the Project does not compromise commercial fishery associated vessels. The **Fisheries Mitigation, Monitoring and Communication Plan (FMMCP), Volume 3 of the EIAR** would continue to be developed in accordance with consultation with affected commercial fisheries operators. The final version of this document would identify mitigation measures to further limit the potential effects of the Project. These endeavours would be supported by fisheries working/liaison groups to ensure affected fishing communities can communicate with the Applicant and inform the Project.
- 5.11.3.7 This package of proportionate and enforceable mitigation measures includes the implementation of a Fisheries Mitigation, Monitoring and Communication Plan, the appointment of dedicated fisheries liaison roles, phased construction sequencing to minimise disruption, and the provision of timely and accurate information to fishing operators. These measures will be secured through consent conditions and will be developed in consultation with affected stakeholders. Taken together, they provide a robust framework to minimise adverse effects and ensure that residual impacts remain minor and not significant.
- 5.11.3.8 The planning assessment concludes that the Project would be in accordance with FISHERIES 1, FISHERIES 2 and FISHERIES 3 of the Scottish National Marine Plan (2015).
- 5.11.3.9 Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project as set out in Section 4, with the planning balance detailed in Section 6 of this Statement.

5.12 SHIPPING AND NAVIGATION

5.12.1 SUMMARY OF KEY POLICY REQUIREMENTS

5.12.1.1 Relevant policy in relation to Shipping and Navigation includes:

- Scottish National Marine Plan (2015):
 - TRANSPORT 1 provides the relevant factors that will be taken into account when reaching decisions regarding development and use to ensure that navigational safety in relevant areas used by shipping now and in the future will be protected.
 - TRANSPORT 2 sets out that marine development will not be permitted where it will restrict access to, or future expansion of, major commercial ports or existing or proposed ports and harbours which are identified as National Developments in the current NPF or as priorities in the National Renewables Infrastructure Plan (Map 10 and 11).
 - TRANSPORT 3 sets out that developments will not be consented if they interfere with lifeline ferry services.
 - TRANSPORT 4 provides guidance regarding the maintenance, repair and sustainable development of port and harbour facilities in support of other sectors.

- TRANSPORT 6 requires developers to ensure that displacement of shipping is avoided where possible to mitigate against potential increased journey lengths (and associated fuel costs, emissions and impact on journey frequency) and potential impacts on other users and ecologically sensitive areas.
- Sectoral Marine Plan for Offshore Wind Energy
 - The SMP list a number of key issues that need to be identified at the project level which includes:
 - Issues relating to navigational safety, aviation and collision risk.

5.12.2 IMPACT ASSESSMENT

5.12.2.1 The shipping and navigation assessment considers commercial vessels, such as cargo vessels, commercial fishing vessels, recreational vessels, military vessels, port related services and emergency responders, such as the RNLI, as groups of receptors within the Shipping and Navigation Study Area. The Shipping and Navigation Study Area is comprised of the Offshore Project Boundary, plus a buffer of ten nautical miles (nm). The assessment considers the relevant effects associated with the construction, operation and maintenance and decommissioning phases:

- All phases:
 - Vessel displacement.
 - Increased collision risk between third-party vessels.
 - Collision risk between a third-party vessel and an Offshore Project vessel.
 - Reduced access to local ports, harbours and facilities.
- Operation and maintenance only:
 - Allision risk between a vessel and the Offshore Project.
 - Reduction in under keel clearance.
 - Vessel interaction with subsea cables.
 - Reduction in emergency response capability.

5.12.2.2 Several shipping and navigational areas and activities are identified within the vicinity of the Offshore Project, most prominently is the Loch Roag area, which is located approximately 1.9nm at its closest point southeast of the Array Area. The Loch Roag area features Aids to Navigation, such as the Aird Laimishader lighthouse, aquaculture sites and several small fishing and recreational harbours. The closest commercial port is Stornoway/Steòrnabhagh Harbour, on the east coast of the Isle of Lewis/Eilean Leòdhais. Shipping and navigation are considered within other topics of the EIAR including ports and harbours in the Socio-Economic assessment; navigation safety in an emergency response event in the Military and Civil Aviation assessment; recreational impacts in the Other Sea Users assessment; and specific fishing vessel impacts in the Commercial Fisheries assessment.

5.12.2.3 Data to inform the shipping and navigation assessment has been gathered from a range of desk-based data sources and information gathered in a series of site surveys, including a vessel-based

survey undertaken in summer 2023, and two shore-based surveys at Brue/Brù undertaken in winter 2024 and summer 2024. During the winter period, there was an average of five to six unique vessels per day recorded within the Shipping and Navigation study area, and an average of one per day recorded within the Array Area itself and the OCAS. During the summer period, this figure rose to an average of between seven to eight unique vessels per day recorded within the Shipping and Navigation study area. A Hazard Workshop was undertaken in February 2025 to allow local users and identified stakeholders to provide feedback and to further risk assess vessel traffic movements and potential interactions with the Offshore Project.

- 5.12.2.4 Based on experience, as well as findings in the Hazard Workshop, it is anticipated that most commercial and fisheries vessels will choose not to routinely navigate internally within the buoyed construction/decommissioning area. Vessels will be temporarily displaced within the Offshore Cable Area of Search which will have a localised temporary impact between the months of April and October. The main consequence of this will be increased journey times and distanced for vessels to travel. Based on the vessel traffic data collected, it was estimated that two of the ten main commercial routes would deviate as a result of the construction of the project which could lead to increase densities inshore of the Array Area. The assessment identifies that mitigation embedded into the design such as a Navigational Safety and Vessel Management Plan; timely Notice to Mariners and other navigational warnings; communication through the Offshore Fisheries Liaison Officer (OFLO), UK Chambers of Shipping Company Fisheries Liaison Officer (CFLO), and Fishing Industry Representative (FIR); and marine coordination and communication to manage project vessel movements reduces potential impacts from the project. This will result in a tolerable impact on the shipping and navigation activities. In EIA terms these are considered as not significant impacts.
- 5.12.2.5 The assessment identifies that during operation and maintenance mitigation embedded into the design such as those mentioned above for construction as well as operational marine lighting and marking; all project infrastructure marked appropriately on UKHO Admiralty Charts; implementation and monitoring of subsea cable protection; and a Search and Rescue Emergency Response Cooperation Plan will result in a broadly acceptable to tolerable impact on the shipping and navigation activities. In EIA terms these are considered as not significant impacts.
- 5.12.2.6 Three potential future developments were identified within the Zone of Influence (defined as a 50nm buffer of the Array Area) with the potential for cumulative effects on shipping and navigation. These are the proposed Havbredey Offshore Wind Farm, Talisk Offshore Wind Farm and Spaceport 1 Sub-Orbital Vertical Launch Spaceport. Impacts include the presence of buoyage and surface structures displacing vessels that currently route in proximity to the Offshore Project Boundary and, for the Spaceport, the presence of a Space Launch Hazard Area which may displace vessels. The assessment identifies that impacts are considered not significant with mitigation which is as low as reasonable possible.

5.12.3 PLANNING ASSESSMENT

- 5.12.3.1 Relevant policies set out criteria for the Project to protect shipping and navigation receptors from unacceptable adverse impacts as well as to demonstrate how the Project has minimised any adverse effects.
- 5.12.3.2 The Project in terms of its design and siting would be carefully considered to ensure it would not require the rerouting of commercial shipping routes in a manner that would cause harm to the viability of such commercial shipping routes. The associated environmental measures would work to ensure the potential effects from the Project on shipping and navigational receptors are not significant. The Project would ensure its construction; operation and maintenance; and decommissioning activities are well known in advance by vessels operating in proximity to the Project. The **Outline Offshore Environmental Management Plan, Volume 3** of the EIAR would ensure construction activities are carried out in a manner that ensures they do not disrupt other vessels, including the careful management of vessels associated with the Project. The Project would be sufficiently lit during its construction and operational and maintenance phases through the use of **Outline Lighting and Marking Plan, Volume 3** of the EIAR, to ensure third party vessels can accurately identify the Project. A Decommissioning Programme would be used during this stage to ensure it is decommissioned appropriately and in a manner that is safe and not disruptive to marine vessels navigating and operating within the local area.
- 5.12.3.3 When the embedded environmental measures to prevent, control and limit the potential for effects on shipping and navigation during the lifetime of the Offshore Project are considered, there are no significant effects in relation to shipping and navigation impacts from the construction, operation and maintenance, and decommissioning phases including when cumulative development considerations are taken into account. It is therefore considered that the Project would be in accordance with policies TRANSPORT 1, TRANSPORT 2, TRANSPORT 3, TRANSPORT 4, TRANSPORT 6 of Scotland's National Marine Plan (2015), and the SMP 2020.
- 5.12.3.4 Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project as set out in Section 4, with the planning balance detailed in Section 6 of this Statement.

5.13 OTHER SEA USERS AND RECREATION

5.13.1 SUMMARY OF KEY POLICY REQUIREMENTS

- 5.13.1.1 Relevant policy in relation to Other Sea Users, Tourism and Recreation includes:
- Scottish National Marine Plan (2015):
 - REC & TOURISM 1 provides support to promote sustainable development of marine recreation and tourism.

- REC & TOURISM 2 sets out key factors that should be taken into account when deciding on uses of the marine environment and the potential impact on recreation and tourism; and
- REC & TOURISM 4 sets out that developers should give consideration to the facility requirements of marine recreation and tourism activities, including a focus on support for participation and development in sport. Co-operation and sharing infrastructure and/or facilities, where appropriate, with complementary sectors should be supported as should provision of low carbon transport options.
- Sectoral Marine Plan for Offshore Wind Energy
 - The SMP list a number of key issues that need to be identified at the project level which include noise and vibration effects on the west coast of the Isle of Lewis:
 - Issues relating to navigational safety, aviation and collision risk; and
 - Effects on marine and coastal recreation and access.

5.13.2 IMPACT ASSESSMENT

5.13.2.1 The other sea users' assessment considers the likely significant effects of the Offshore Project with respect to other sea users, tourism and recreation including receptors such as boat tour operators, recreational sea anglers, surfers, local ports and passenger ferries, aquaculture companies, and onshore tourism attractions and rights of way. The assessment considers the effects associated with temporary (construction and decommissioning phases) and long-term (operation and maintenance phase) effects of:

- Impacts on aquaculture resources and sporting estates
- Impacts on harbour management and marine maintenance
- Beneficial impacts and business opportunities
- Displacement/disturbance to boat tour operators or other recreational and tourism activities
- Displacement/disturbance to recreational sea anglers and specific angling tour operators
- Visual impacts and noise disturbance

5.13.2.2 The area within the Array Area and Offshore Cable Area of Search represents an area where direct impacts to other sea users, tourism and recreation have the potential to occur, whilst the potential for indirect impacts is assessed within the 1km buffer surrounding the Offshore Project. A 60km ZTV To assess effects for tourism and recreation receptors located onshore arising from visual impacts and noise from the Offshore Project. Data to inform the other sea users' assessment has been gathered from a range of desk-based data sources.

5.13.2.3 A range of environmental measures which are relevant to other sea users are embedded as part of the Offshore Project design to remove or reduce significant environmental effects as far as possible. Key measures for the other sea users' assessment are:

- Construction Environmental Management Plan.

- Consultation with local, regional and national fishing organisations, as well as individual fishers will be undertaken. Engagement with the fishing community will be established via implementation of an OFLO, CFLO and FIR.
- Timely and efficient distribution of Notices to Mariners, Kingfisher notifications, and other navigational warnings of the position and nature of works associated with the Offshore Project.
- Safety zones up to 1000m around surface piercing structures.
- Compliance of all project vessels with international marine regulations.
- On site manned vessels present to monitor and advice other marine used of activities associated with the Offshore Project.
- Use of local vessels where possible.

5.13.2.4 Despite no aquaculture sites being identified within the Study Area, there is potential for temporary disruption to aquaculture resources and sporting estates during all phases of the development. There is potential for temporary disturbance and loss of access to boat tour operators and other recreation and tourism activities during the Offshore Project's lifetime. Out of all the boat tours, only tours to the Shiant Islands/Na h-Eileanan Seunta and North Rona/Rònaigh are likely to be disrupted by the Offshore Project during transit through the Offshore Cable Area of Search. Based on the short-term and temporary duration of construction (5 years) and infrequent nature of repair events during the 35-year operational period, the magnitude of impact to boat tour operators is considered to be low.

5.13.2.5 The assessment identified a minor beneficial impact on small ports and Stornoway port during construction and operation from usage by personnel working on the Offshore Project.

5.13.2.6 Given the comparable but reverse nature of decommissioning to the construction phase, it is considered that the impacts assessed for the construction phase will be the same for decommissioning. A Decommissioning Programme will be produced for the Offshore Project in line with The Energy Act (2004) and the Scotland Act (2016). The Decommissioning Programme will follow guidance as set out by Marine Directorate (2022) and decommissioning activities will comply with all relevant legislation at the time of decommissioning.

5.13.2.7 The assessment identified no other developments which could result in a cumulative effect on other sea users with the Offshore Project.

5.13.3 PLANNING ASSESSMENT

5.13.3.1 Relevant policies set out criteria for the Project to protect existing infrastructure and other marine users from unacceptable adverse impacts as well as to demonstrate how the Project has minimised any adverse effects.

5.13.3.2 The Project will be developed within the N4 OAA. These areas have been identified by Scottish Government as generally appropriate for offshore wind development subject to detailed siting and consideration. The siting of the Project within such an area would be carefully considered to keep

potential effects identified low and the Project would further refine it siting to reduce potential effects on existing infrastructure and surrounding marine uses as outline supporting plans become refined and progressed ahead of construction.

- 5.13.3.3 The assessment reported within **Chapter 20: Other Sea Users, and Recreation, Volume 2a** of the EIAR considers potential effects upon; aquaculture companies and operators; ports, harbours and slipways; boat tour operators, surfers and other sea users and tourists and recreational sea anglers and angling tour operators.
- 5.13.3.4 All identified effects at each stage of the Project will be not significant.
- 5.13.3.5 Given that no significant effects have been identified it is considered that the Project would be in accordance with policies REC & TOURISM 1, 2 and 4 of the Scottish National Marine Plan (2015) and in accordance with the Sectoral Marine Plan for Offshore Wind Energy.
- 5.13.3.6 Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project as set out in Section 4, with the planning balance detailed in Section 6 of this Statement.

5.14 MILITARY AND CIVIL AVIATION

5.14.1 SUMMARY OF KEY POLICY REQUIREMENTS

- 5.14.1.1 Relevant policy in relation to Military and Civil Aviation includes:
- Scottish National Marine Plan (2015):
 - DEFENCE 1 provides guidance on maintaining operational effectiveness in Scottish waters used by the armed forces services and sets out that development and use will be managed in the following areas: Naval areas including bases and ports, Firing Danger Areas (Map 13), Exercise Areas (Map 13) and Communications.
 - DEFENCE 2 sets out that the MOD may establish by-laws for exclusions and closures of sea areas. Where there may be conflict with other marine users, appropriate mitigation will be identified and agreed with the MOD, prior to planning permission, a marine licence, or other consent being granted.
 - Sectoral Marine Plan for Offshore Wind Energy (2020)
 - The SMP list a number of key issues that need to be identified at the project level which includes:
 - Issues relating to navigational safety, aviation and collision risk.
 - NPF4 (2023)
 - Policy 11 states that project design and mitigation will demonstrate how the impact on aviation and defence interests including seismological recording will be addressed.

5.14.2 IMPACT ASSESSMENT

- 5.14.2.1 The military and civil aviation assessment considers effects on UK aviation and radar receptors including Civil Aerodromes, Military Activities, National Air Traffic Services (NATS) Facilities, Meteorological Facilities, Other aviation activities, within the Military and Civil Aviation Study Area. The Military and Civil Aviation Study Area is comprised of the Offshore Project Boundary, plus a buffer of 60 nm. This includes the airspace between the Turbine Area and the UK mainland, extending from St Kilda to the southwest, to the proposed weather radar site at Campar Mor to the east. The assessment considers the relevant effects associated with the construction, operation and maintenance and decommissioning phases, including:
- All phases:
 - Creation of an aviation obstacle environment.
 - Increase air traffic in relation to wind farm activities.
 - Operation and maintenance only:
 - Impact to military Benbecula air defence radar.
 - Impact to NTS radio communications.
 - Impact to weather radars.
- 5.14.2.2 The primary data sources to inform the military and civil aviation assessment are the UK civil and military Aeronautical Information Publication (AIPs). The AIPs contain details on airspace and en route procedures as well as en route and aerodrome charts and other air navigation information.
- 5.14.2.3 The nearest civil airport to the Array Area is Stornoway/Steòrnabhagh Airport located 29.6 km to the southeast. Stornoway/Steòrnabhagh Airport has established Instrument Flight Procedures which lie coincidental with the Array Area.
- 5.14.2.4 The assessment on military and civil aviation in the EIAR **Chapter 17 Military and Civil Aviation, Volume 2a** identifies that the creation of an aviation obstacle environment to instrument flight procedures (IFP) at Stornoway Airport will have the greatest potential for impact during all phases of the Offshore Project. WTGs infringing IFP protected surfaces will require IFPs to be redesigned with higher minimum safe altitudes which could result in an impact on Stornoway Airport operations due to the potential reduction in aircraft being able to land at the airport in poor weather and a moderate adverse (Potentially Significant) effect is identified on the Stornoway Airport IFPs. Further environmental mitigation measures have been proposed in order to better manage and reduce these effects to a minor adverse (Not Significant) effect.
- 5.14.2.5 Embedded mitigation for all phases of the Offshore Project such as the development of a Lighting and Marking Plan (LMP) in agreement with key aviation stakeholders, and through the provision of the positions and heights of structures to the CAA, MOD and Defence Geographic Centre (DGC) will mitigate potential impacts of creating an aviation obstacle environment. Mitigation will also comprise compliance with international and national Standards and Recommended Practices (SARPs) which would make pilots aware of the infrastructure within the Turbine Area. Low flying

military activity, offshore commercial, and SAR helicopters are considered medium sensitivity receptors with a low magnitude of effect predicted. As such the assessment determines a minor adverse and not significant impact for the lifetime of the Offshore Project.

- 5.14.2.6 The predicted low number of helicopter movements during all phases will be managed by the existing Air Traffic Services' (ATS) infrastructure provided in accordance with national procedures, and pilots will be expected to operate in accordance with regulatory requirements. This increase in air traffic related to wind farm activities will impact receptors assessed as medium sensitivity with a low magnitude of effect. As such the potential effects are minor adverse and not significant in EIA terms.
- 5.14.2.7 When the embedded environmental measures to prevent, control and limit the potential for effects on military and civil aviation during the lifetime of the Offshore Project are considered, there are No Significant Effects in relation to military and civil aviation impacts from the construction, operation and maintenance, and decommissioning phases.

5.14.3 PLANNING ASSESSMENT

- 5.14.3.1 Relevant policies set out a need for the Project to ensure that it does not unacceptably compromise affected military and civil aviation receptors.
- 5.14.3.2 The Project would be designed to ensure it would minimise its potential effects upon military and civil aviation receptors and would be developed within the in the N4 OAA, which is identified as suitable for offshore wind farm development. The Project would use environmental measures that would aid in achieving the level of effects identified and demonstrate the Project's attempts to mitigate its potential effects on civil and military aviation receptors.
- 5.14.3.3 The design with its embedded mitigation means that the EIA finds there are no significant effects on military and civil aviation during the construction, operational and maintenance or decommissioning stages, including when cumulative development considerations are taken into account. It is therefore considered that the Project would be in accordance with policies DEFENCE 1 and DEFENCE 2 of the Scottish National Marine Plan (2015), the SMP (2020) and policy 11 of the NPF4.
- 5.14.3.4 Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project as set out in Section 4, with the planning balance detailed in Section 6 of this Statement.

5.15 OFFSHORE ARCHAEOLOGY AND CULTURAL HERITAGE

5.15.1 SUMMARY OF KEY POLICY REQUIREMENTS

- 5.15.1.1 Relevant policy in relation to Offshore Archaeology and Cultural Heritage includes:

- Scottish National Marine Plan (2015)
 - GEN 6 requires development to protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance.
- Sectoral Marine Plan for Offshore Wind Energy
 - The SMP list a number of key issues that need to be identified at the project level which includes:
 - Loss of/damage to historic environment features and their settings.
- NPF4 (2023)
 - Policy 7 looks to protect and enhance the historic environment and places, and to enable positive change to be a catalyst for the regeneration of places.

5.15.2 IMPACT ASSESSMENT

5.15.2.1 The offshore archaeology and cultural heritage assessment considers designated heritage assets (onshore and offshore) and non-designated heritage assets (offshore), as groups of receptors within the Marine Archaeology Study Area. The assessment also considers impacts of the Offshore Project on the settings of archaeology and cultural heritage assets. The assessment considers the effects associated with construction, operation and maintenance and decommissioning phases, including:

- Construction
 - Direct impacts, including drilling or seabed preparation.
 - Indirect impacts, including vibration or an increase in suspended sediment from drilling piles.
- Operation and maintenance
 - Direct impact, including maintenance activities such as cable protection replacement.
 - Indirect impacts, including burial of heritage assets as a result of operation and maintenance activities.
 - Indirect impacts that affect the setting of Designated and significant non designated Onshore Archaeology and Cultural Heritage assets as a result of Offshore Project infrastructure.
- Decommissioning
 - Direct impacts, including drilling or seabed preparation.
 - Indirect impacts, including vibration or an increase in suspended sediment from drilling piles.

5.15.2.2 Data to inform the offshore archaeology and cultural heritage assessment has been gathered from a range of desk-based data sources and information gathered through site surveys, including a full geophysical survey of the Array Area. Due to the nature of offshore archaeological remains, their identification and assessment necessarily required an element of assumption. Formal scoping workshops were undertaken in May and June 2023 to inform the EIA scoping report. Further

consultation was held with several relevant stakeholders to offshore archaeology and cultural heritage including Historic Environment Scotland and Western Isles Council/Comhairle nan Eilean Siar (CnES).

- 5.15.2.3 The marine archaeology and cultural heritage assessment considers the historic character of the seabed, with analysis of potential features with archaeological potential. The assessment identified 45 non-designated assets within the Marine Archaeology Study Area and one non-designated asset within the Offshore Project Boundary. The single non-designated asset within the Offshore Project Boundary is a wreck record for the *Maju* (Canmore ID 217551), which is a mid-19th century iron ship, that wrecked in 1874 while carrying a cargo of coal. There are no designated heritage assets located within the Offshore Project Boundary. With respect to the settings assessment, there are 38 scheduled monuments, five listed buildings and three non-designated heritage assets that are considered. The scheduled monuments include prehistoric burial cairns, stone circles, including the complex at Calanais or Callanish, standing stones and settlements and brochs or duns.
- 5.15.2.4 Best practice favours the preservation in situ of archaeological remains, therefore, the ideal preferred mitigation for archaeological remains is avoidance. Avoidance is considered the primary means of mitigation and will continue to be applied throughout all phases of the Offshore Project.
- 5.15.2.5 Despite the application of appropriate embedded mitigation measures, there remains a direct significant impact on unknown potential remains of all periods during activities such as drilling, foundation construction or removal, seabed levelling, ploughing and cable lay, and cable protections. This is a worst-case scenario assuming that the initial impact during discovery damages multiple key components of the archaeological materials or context. During operation and maintenance, the direct impact that affects the significance of assets caused by changes to the setting of designated and significant non-designated onshore archaeology and cultural heritage assets: Teampull Eoin, chapel, graveyard & settlement, Port Mhór Bragar, Lewis (SM3926) and Dun Borge, broch (SM1669), is considered significant due to the high heritage value of these assets. Mitigation is not proposed as it would not change the significance of effect.
- 5.15.2.6 Otherwise, with the appropriate embedded mitigation measures, the EIA finds there will be no direct significant effects on the remaining assets identified in the baseline study and no indirect significant effects on offshore archaeology and cultural heritage during the lifetime of the project. All onshore archaeology and cultural heritage receptors within the Zone of Theoretical Visibility (ZTV) are vulnerable to impact, but any affected receptors would recover following the removal of the construction equipment and the wind turbine infrastructure.
- 5.15.2.7 Due to the nature of and distance to the Offshore Project, it was not expected that there would be a potentially significant cumulative impact to the settings of Onshore Archaeology and Cultural Heritage receptors as a result of non-visual factors, such as operational noise. It is not considered that other developments identified in the ZoI (defined as 2km offshore and 60km onshore) would give rise to significant cumulative effects.

5.15.3 PLANNING ASSESSMENT

- 5.15.3.1 Relevant policies set out for the Project to protect archaeological and heritage assets from being disturbed, alongside protecting their character and setting if appropriate.
- 5.15.3.2 The Project has been carefully sites and designed to ensure it avoids areas of known archaeological remains and heritage assets, with marine archaeological remains and heritage assets, with marine archaeological remains of lesser significance being avoided by the temporary and permanent offshore footprint, where practicable. However, it is acknowledged that during the construction and operational and maintenance phases of the development there is the potential to generate significant effects of medium magnitude on currently unknown archaeological remains. The Project would attempt to ensure that such effects are managed through ensuring the loss or disturbance of possible submerged historic elements arising from altered seabed conditions (e.g. scour) will be mitigated in the first instance as far as possible, through sensitive design including utilising the mechanisms of Areas of Archaeological Interest (AAI) and archaeological exclusions zone environmental measures where necessary. Whilst it might not be possible to fully mitigate these significant effects, the Project has demonstrated its commitment to reducing its overall potential effects on all other heritage receptors through its applied environmental measures, of which few effects are identified, and has sought to propose the best and most suitable embedded mitigation for the identified potential significant effect in the design of the Project.
- 5.15.3.3 Even though there is the potential for significant effects upon marine archaeology and cultural heritage related to disturbance of unknown archaeological remains, such effects have been accurately quantified and potential mitigation proposed, meaning the Project would be in accordance with policies GEN 6 of Scotland's National Marine Plan (2015), along with the SMP 2020 and Policy 7 of NPF4.

5.16 SEASCAPE, LANDSCAPE AND VISUAL IMPACT

5.16.1 SUMMARY OF KEY POLICY REQUIREMENTS

- 5.16.1.1 Relevant policy in relation to Seascape, Landscape and Visual Impact includes:
- Scottish National Marine Plan (2015):
 - GEN 7 requires development to take seascape, landscape and visual impacts into account. Of particular relevance it states that developments that affect NSAs should only be permitted where:
 - *"It will not adversely affect the integrity of the area or its special qualities for which it has been designated; or*
 - *Any such adverse effects are clearly outweighed by social, environmental or economic benefits of national importance."*
 - Sectoral Marine Plan for Offshore Wind Energy

- The SMP list a number of key issues that need to be identified at the project level which includes:
 - Effects on landscape and coastal characters and visual receptors.
- NPF4 (2023)
 - Policy 4 sets out requirements that must be met if the development affects a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve and if the developments affects a site designated as a local nature conservation site or landscape area in the LDP; and
 - Policy 11 states that project design and mitigation will demonstrate how the impact on significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable.

5.16.2 IMPACT ASSESSMENT

- 5.16.2.1 The seascape, landscape and visual impact assessment considers the effects of the Offshore Project with respect to seascape, landscape and visual receptors and is contained within **Chapter 18, Volume 2a**. The Offshore Project includes the wind turbine generators, associated foundations, the array cables and offshore substation. The assessment considers the effects associated with construction, operation and maintenance and decommissioning phases on:
- Visual receptors/views
 - Coastal character
 - Landscape character
 - Special qualities of the South Lewis, Harris and North Uist NSA
 - Navigation and aviation lighting
- 5.16.2.2 Data to inform the seascape, landscape and visual impact assessment has been gathered from a range of desk-based data sources and information gathered in a series of site surveys, including a field survey verification of the ZTV.
- 5.16.2.3 With regard to effects on visual receptors/views, **Chapter 18, Volume 2a** notes that the Offshore Project will have visual effects on visual receptors and views during the construction, operational and maintenance stage, and decommissioning. A full description of the baseline conditions is presented with the assessment of the visual effects in **Appendix 18.3, Volume 2c** of the EIAR.
- 5.16.2.4 A range of effects on visual receptors are experienced both during the construction and operational and maintenance phases of the development ranging from moderate/minor adverse (not significant) through to major adverse which is considered significant in EIA terms. The major adverse effects are experienced by those visual receptors that have a high sensitivity and a high

magnitude of change of the baseline environment as a result of the construction and operation of the Project.

- 5.16.2.5 Construction and decommissioning phase effects on views will occur as a result of the construction and decommissioning activities, including the presence of jack-up vessels and/or heavy lift vessels for the installation of foundations substructures and WTGs, wind farm service vessels and accommodation vessels; and partially constructed offshore elements; all of which may combine to alter views from the coast through visibility of the construction and decommissioning activities. Broadly the change on views arising from the Project occurs from areas within a theoretical visibility of the Turbine Area concentrated along the west coast of the Isle of Lewis/*Eilean Leòdhais*, between the Butt of Lewis/*Rubha Robhanais* in the north and Magersta/*Mangurstadh* Head in the south/southwest, along the Atlantic coastline of the Isle of Lewis/*Eilean Leòdhais*.
- 5.16.2.6 The operational and maintenance phase of the Project will introduce large-scale, human-made elements including WTGs and the OSP to the seascape of the northwest coast of the Isle of Lewis/*Eilean Leòdhais*. During this phase there will also be occasional but regular maintenance vessels within the Offshore Project area carrying out maintenance and repairs to the infrastructure. The Turbine Area would be 6-7 km from the coast at its closest point. **Chapter 18, Volume 2a** of the EIAR concludes that the coastal edge of the northern part of the northwest coast of the Isle of Lewis/*Eilean Leòdhais* is the most populated areas between the Butt of Lewis/*Rubha Robhanais* down to Shawbost/*Siabost*, where the flat landscape and low, linear coastline affords relatively open seaward views. As the landscape becomes rockier and hillier further to the south, it also becomes more sparsely settled, with sea views often framed by cliffs along the coastal edge or by landform. As the coastline becomes more indented including intricate sea lochs of the archipelago of Bernera and the successive headlands at Gallan Head/*Àird Uig* and Mangersta/*Mangurstadh* Head, settlement reduces further. From headlands there are often open seaward views, elsewhere there is often a complex layering of headlands, islands, sea lochs and freshwater lochs with more limited open seaward views. West and south of Bosta/*Bostadh* beach on the north of Great Bernera/*Beàrnaraigh Mòr* runs the boundary of the NSA which confers a higher value. Due to the concentration of either settlement or more sensitive landscapes (such as the NSA) and intricate and highly valued coastline south of Shawbost/*Siabost*, the proximity of the Turbine Area to the coastline of northwest Lewis/*Eilean Leòdhais* has resulted in significant effects for most of the viewpoint locations within 30 km of the Turbine Area, with occasional exceptions where visibility of the Offshore Project is restricted by intervening landforms or headlands. Beyond 30 km, the Offshore Project would occupy a relatively small part of the view, be visible only at long distance or will be obscured by the intervening landmass of the Isle of Lewis/*Eilean Leòdhais* such that there are no significant effects beyond this range.
- 5.16.2.1 The effects of the Project on Coastal Character will occur as a result of the construction and decommissioning activities. During this phase, the influence of the Project on coastal character will be greatest towards the end of the construction phase, when there is likely to be a mix of

constructed and partially constructed WTGs/jacket foundations present in the sea off the west coast of the Isle of Lewis/*Eilean Leòdhais*, together with large WTG installation vessels (such as jack up installation vessels) and other vessels being used for other offshore construction and decommissioning activities (such as cable laying, drilling and support vessels). Open seaward views from the west coast of the Isle of Lewis/*Eilean Leòdhais* will be partially changed through the introduction of the construction and decommissioning works within the Array Area, which will introduce man-made elements and activities in seaward views. The large scale and modern technology of such structures and vessels will contrast with the strong sense of naturalness and remoteness experienced from the coastline.

- 5.16.2.2 The magnitude of change resulting from the construction and decommissioning of the Offshore Project and its significance of effects on coastal character varies according to the extent to which the Offshore Project will change, perceptually, the characteristics and qualities of the coastal character. This varies depending on the seascape context and its scale; the amount of the Offshore Project that will be visible; the distance between the coast and the Turbine Area; and the extent of change, which may be localised, or occurring over wide areas. Broadly, the change arising from the Offshore Project on perceived coastal character occurs from areas with theoretical visibility of the Turbine Area (**Appendix 18.6, Volume 2c**) concentrated along the west coast of the Isle of Lewis/*Eilean Leòdhais*, between the Butt of Lewis/*Rubha Robhanais* in the north and Magersta/*Mangurstadh* Head in the south/southwest, along the Atlantic coastline of the Isle of Lewis/*Eilean Leòdhais*.
- 5.16.2.3 During the operational and maintenance phase of the development the Project will introduce an array of modern man-made elements within seaward views from the west coast of the Isle of Lewis/*Eilean Leòdhais*, approximately 6-7 km from the closest portion of coastline, but at greater distances of around 20 km from the Butt of Lewis/*Rubha Robhanais* to the north and Mangersta/*Mangurstadh* Head to the south. The large apparent (vertical) scale and lateral spread of the Turbine Area, and modern 'technological' appearance of the WTGs, will occupy a substantial portion of the panorama of seascape from the closest coastline, and contrast with the strong sense of naturalness and remoteness experienced. The operation and maintenance of the Offshore Project will also affect a diversity of coastal characteristics experienced along the western seaboard of the Isle of Lewis/*Eilean Leòdhais*, ranging from the low rocky coast, small-scale traditional crofting, indented enclosed bays, sandy Hebridean beaches, rugged cnoc and lochan islands and hinterland, and remote high-medium cliffs backed by steep rugged mountains in the south of the Isle of Lewis/*Eilean Leòdhais* and the north of the Isle of Harris/*Na Hearadh*.
- 5.16.2.4 In particular reference to the South Lewis, Harris and North Uist NSA, **Chapter 18, Volume 2a** of the EIAR finds that the Offshore Project would principally affect the north and northwest of the NSA, with the visibility form the south and east far removed from the Offshore Project. Five subareas of the NSA have been identified for detailed assessment, with the areas defined by the

other landscape work within the assessment and consideration of the Special Landscape Qualities (SLQs):

Table 5-1 Sub areas and SLQs

Sub areas	Relevant SLQs
Sub area 1: Outer Northwest Lewis Coastline	<ul style="list-style-type: none"> • The very edge of Europe • A rich variety of exceptional scenery • A great diversity of seascapes • Intervisibility between landscapes • The close interplay of the natural world, settlement and culture
Sub area 2: Lewis Coastal Cnoc and Lochan	<ul style="list-style-type: none"> • A rich variety of exceptional scenery • A great diversity of seascapes • Intervisibility between landscapes • Extensive machair and dune systems with expansive beaches • The very edge of Europe • The close interplay of the natural world, settlement and culture • The indivisible linkage of landscape and history
Sub area 3: The Teathabhal and Uig Rocky Peatlands	<ul style="list-style-type: none"> • A rich variety of exceptional scenery • Intervisibility between landscapes • Deep sea lochs that penetrate the hills • The close interplay of the natural world, settlement and culture
Sub area 4: The Lewis Mountains	<ul style="list-style-type: none"> • The wild mountainous character • A rich variety of exceptional scenery • The great diversity of seascapes • Intervisibility between landscapes • The close interplay of the natural world, settlement and culture
Sub area 5: The North Harris Mountains	<ul style="list-style-type: none"> • The wild mountainous character • Intervisibility between landscapes • A rich variety of exceptional scenery • Intervisibility between landscapes

5.16.2.5 The Offshore Project has no direct effects on the NSA with all effects being perceived effects only. The assessment finds that the potential adverse effects of the Offshore Project have been reduced by design, with the Array Area refined in response to the NSA. Design changes made include reducing the scale and height of the WTGs and maximising the setback distance from the Array

Area from the NSA (to 11 km). No significant adverse effects have been found on the SLQs on sub areas 3 and 5, but the assessment does find that there would be significant adverse effects on the SLQs of the very edge of Europe, a rich variety of exceptional scenery, a great diversity of seascapes, intervisibility between landscapes and the close interplay of the natural world, settlement and culture across sub areas 1 and 2, with significant effects also being found on the extensive machair and dune systems with expansive beaches SLQ of sub area 2 and the wild mountainous character SLQ of sub area 4. These significant effects would occur through all phases of the project during day time, with the SLQs of a rich variety of exceptional scenery, a great diversity of seascapes, intervisibility between landscapes and the close interplay of the natural world, settlement and culture also experiencing significant effects into night time hours.

5.16.3 PLANNING ASSESSMENT

- 5.16.3.1 Relevant policies set out detail criteria for the Project to protect the seascape, landscape and visual amenity, character and setting of its surroundings from unacceptable adverse impacts, alongside creating an expectation for mitigation and/or landscape improvements to be demonstrated as required.
- 5.16.3.2 **Chapter 18, Volume 2a** has acknowledged that the Project will give rise to major adverse effects on aspects of seascape character and on certain visual receptors. These significant effects primarily relate to the scale of the turbine array, its offshore extent and the degree of change introduced into seascape areas valued for their relative openness. These significant effects will lead to adverse effects on the SLQs of the South Lewis, Harris and North Uist NSA. It is possible that the significant (major to moderate) effects assessed on several SLQs, experienced from parts of three sub-areas of the NSA (but focused particularly on its western coastal extremities) could result in some adverse effects on the unity of the NSA which could have an effect on the integrity of the NSA.
- 5.16.3.3 Whilst it is acknowledged that major adverse effects are anticipated, it is important to consider them in the context of the relevant marine planning framework, most notably the Sectoral Marine Plan for Offshore Wind Energy (2020), within which the site forms part of designation N4. The SMP recognises at a strategic level that *"N4 is located in very inshore waters, and therefore seascape, landscape and visual impacts will occur"* and that potential mitigation measures may be limited. The more recently published Strategic Environmental Assessment for the Draft Updated Sectoral Marine Plan for Offshore Wind Energy notes that N4 *"has the potential to significantly affect seascape character and perception of visual impacts to human receptors, including views from an NSA"*. Notwithstanding, N4 was identified as suitable for future offshore wind deployment following a comprehensive constraints and opportunities analysis and public consultation.
- 5.16.3.4 In allocating N4, the SMP acknowledges that residual significant effects on seascape character, (including via the updated SEA) and significant effects to the NSA may remain even after the application of mitigation at project level, and that such effects are not, in themselves, incompatible with the principle of development. Rather, the SMP sets the expectation that project-level

assessment will refine the location, scale, and design to minimise impacts as far as reasonably practicable, recognising that complete avoidance of significant visual effects is unlikely in certain Draft Plan Option areas. The Project has followed this approach by embedding mitigation through design, including layout refinement, turbine spacing optimisation, and adjustments to array boundaries, to assist in reducing visual prominence while still delivering a viable generating capacity.

5.16.3.5 Furthermore, these anticipated effects of the Project are to be balanced against the significant benefits and need for the Project as set out in Section 4, with the planning balance detailed in Section 6 of this Statement.

5.17 NOISE

5.17.1 SUMMARY OF KEY POLICY REQUIREMENTS

5.17.1.1 Relevant policy in relation to Noise Impact includes:

- Scottish National Marine Plan (2015):
 - GEN 13 states that development in the marine environment should avoid significant adverse effects from man-made noise and vibration, especially on species sensitive to such effects.
- Sectoral Marine Plan for Offshore Wind Energy
 - The SMP list a number of key issues that need to be identified at the project level which include noise and vibration effects on the west coast of the Isle of Lewis
- NPF4 (2023)
 - Policy 11 requires that noise impacts on communities and individual dwellings are addressed.
 - Policy 23 advises that development proposals that are likely to raise unacceptable noise issues will not be supported.

5.17.2 IMPACT ASSESSMENT

5.17.2.1 The offshore airborne noise assessment considers the effects of the Offshore Project with respect to offshore airborne noise, comprising:

- Construction piling noise;
- Operational wind turbine noise.

5.17.2.2 Noise generated by offshore decommissioning works are not considered to result in a likely significant effect and were scoped out of the assessment.

5.17.2.3 Data to inform the noise assessment has been gathered from a range of desk-based sources and information gathered from noise monitoring equipment placed at representative locations across

the survey area to determine the prevailing background noise levels at a sample of six Noise Sensitive Receptors (NSRs) located along, but inside the northwest coastline of the Isle of Lewis/*Eilean Leòdhais*. These NSRs are all residential and are therefore categorised as having a high sensitivity as residential areas by nature contain persons susceptible to noise.

- 5.17.2.4 The assessment on offshore airborne noise in the EIAR **Chapter 19 Offshore Airborne Noise, Volume 2a** identifies that the construction phases will have the greatest potential for impact. The assessment has identified potential offshore construction piling noise to be significant during the nighttime-period for the closest NSRs, which are at Labost, Brue/Brù, and Ballantrushal/Baile an Truiseil. Mitigation is embedded into the Project design in relation to noise through the Offshore Piling Noise Management plan which will confirm measures to ensure that noise is minimised through use of good practices. The Project design has considered noise impacts in the layout to ensure that applicable noise limits will be met.
- 5.17.2.5 The wind turbine type to be installed at the Offshore Project is not yet known therefore predictions and assessments were undertaken, for two bounding scenarios within the Project Design Envelope, based on a candidate turbine type:
- Option 1 (up to 60 turbines), the candidate turbine type is the Vestas V236 15 MW;
 - Option 2 (up to 44 turbines), the candidate turbine type is the 22 MW SGRE-276.
- 5.17.2.6 These two scenarios provide key maximum design parameters for assessment which means that intermediate configurations (such as 52 WTGs with a blade tip height between 293.8 m and 338.4 m where the total rotor swept area falls within the defined swept area parameter) may also be deployed, on the basis that they fall within these bounding scenarios.
- 5.17.2.7 During operation, due to the presence of the coastline as a constant natural environmental noise source and the naturally higher wind speeds found at this exposed coastal location, the prevailing background noise levels are not as low as typically found at in-land/hillside/moorland sites. The higher prevailing background noise levels will therefore serve to reduce the level and duration of any potential exposure to the future operational wind turbine noise levels from the Offshore Project. For each scenario operational wind turbine noise levels are below daytime and night-time limits at all receptors during both downwind and upwind conditions. The magnitude of effect is therefore low in all scenarios, and the assessment identifies a negligible/minor significance of effect which is not significant in EIA terms.

5.17.3 PLANNING ASSESSMENT

Construction Piling Noise

- 5.17.3.1 Relevant policies set out criteria for the Project to ensure it would not generate unacceptable adverse impacts due to the noise created by the Project on the marine environment.

5.17.3.2 As has been identified by the relevant supporting EIA Chapters, the potential effects of the Project resulting from construction piling noise is minor adverse (not significant). This demonstrates the well-designed nature of the Project and the efficacy of the environmental measures that have been considered and would be applied to ensure such minimal effects are achieved. The Project is also committed to ensuring its potential effects on identified receptors is monitored and addressed as needed through the supporting **Outline Offshore Environmental Management Plan, Volume 3** of the EIA

Operational Wind Turbine Noise

- 5.17.3.3 Relevant policies set out criteria for the Project to ensure it would not generate unacceptable adverse impacts due to the noise created by the Project on the marine environment.
- 5.17.3.4 When the embedded and additional environmental measures to prevent, control and limit the potential for effects on receptors from offshore airborne noise during construction and operation of the Offshore Project are considered, the EIA finds that there are no significant effects anticipated.
- 5.17.3.5 The design with its embedded mitigation means that the EIA finds there are no significant effects on airborne noise during the construction, operational and maintenance or decommissioning stages, including when cumulative development considerations are taken into account. It is therefore considered that the Project would be in accordance with policy GEN13 of the Scottish Marine Plan (2015), the Sectoral Marine Plan for Offshore Wind Energy, and policies 11 and 23 of NPF4 (2023).
- 5.17.3.6 Furthermore, the effects of the Project are balanced against the significant benefits and need for the Project as set out in Section 4, with the planning balance detailed in Section 6 of this Statement.

6 CONCLUSION AND PLANNING BALANCE

6.1 INTRODUCTION

6.1.1.1 This Section balances the technical assessment, policy compliance and the environmental, social and economic considerations associated with the offshore elements of the Project. It draws together evidence presented across the relevant offshore chapters and the whole Project chapters of the EIA, the embedded mitigation measures secured through (**Chapter 25: Summary of Offshore Mitigation / Statement of Offshore EIA Commitments, Volume 2a**) the EIA, and evaluates the overall Project against the policies of Scotland's National Marine Plan (2015), the requirements of the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020), Draft Updated Sectoral Marine Plan (Scottish Government 2025), as well as the policies set out in NPF4. This section concludes the Planning Statement by balancing the acceptability of impacts, the benefits of the need for the Project, and the accordancy of the Project with relevant policies and other considerations in order to reach an overall, balanced view as to whether consent should be granted.

6.2 PLANNING CONSIDERATIONS

- 6.2.1.1 Across all environmental aspects, the Project has been shown to be supported by a suite of embedded environmental measures, where necessary. The planning assessment of the various environmental topics, as set out in Section 5, confirms that many effects are Negligible or Minor Adverse (Not Significant). Where significant effects are expected, these are considered in greater detail above, alongside the proposed mitigation and identified embedded environmental measures that have been incorporated in the first instance to reduce potential effects as far as possible.
- 6.2.1.2 Beneficial effects have been concluded within **Chapter 8: Greenhouse Gases, Volume 2a** of the EIA, with these often being assessed as significant. This is due to the contribution of renewable electricity generation by the Project over its lifetime, and it being expected to offset its lifecycle emissions after 10 years of its operational life, with a carbon saving of 2,046,701 (tCO₂e/year). Therefore, for the majority (25 years) of the Projects operational and maintenance phase, carbon savings would be provided.
- 6.2.1.3 Additionally, **Chapter 6, Volume 2a** of the EIA identified overall beneficial (significant) effects of the Project, due to the many and multi-faceted nature of the benefits generated, through helping to grow the local economy and providing employment opportunities. Whilst a detailed assessment of the project's decommissioning stage is not provided within **Chapter 6, Volume 2a** of the EIA, it is expected that any Decommissioning Programme prepared would provide beneficial socio-economic associated effects.

6.2.1.4 In relation to planning considerations, the EIA has predominantly concluded that, with the exception of certain residual effects noted in; **Chapter 15: Offshore Archaeology, Volume 2a, Chapter 18, Volume 2a** and **Chapter 22: Offshore Human Health, Volume 2a** of the EIA, the Project is not expected to have any additional residual significant adverse effects. Moreover, as outlined below, the residual effects identified are not sufficient to outweigh the wider benefits of the Project.

6.3 THE ELECTRICITY ACT 1989 AND POLICY CONSIDERATIONS

6.3.1.1 The Project demonstrates full alignment with the duties set out under s.36 and Schedule 9 of the Electricity Act 1989. In its design and consenting approach, the Project has had regard to preserving natural beauty and conserving ecological and geological features, as well as safeguarding historic and archaeological interest. Comprehensive mitigation measures have been embedded to minimise potential adverse effects on these receptors. The embedded environmental measures of using Areas of Archaeological Interest and archaeological exclusion zones would ensure the Project is able to safely manage undiscovered archaeological remains should they be discovered during any stage of the Project. The **Outline Offshore Written Scheme of Investigation, Volume 2c** and **Protocol for Archaeological Discoveries, Volume 2c** of the EIA would ensure the Project manages and monitors its potential effects on known and unknown archaeological receptors, and receptors will be avoided where practicable through micrositing.

6.3.1.2 To maintain safe navigation and protect legitimate sea users, the Project incorporates spatial planning, lighting and marking protocols in accordance with marine safety standards. This is demonstrated through the environmental measures for Safety Zones and **Outline Navigational Safety and Vessel Management Plan, Volume 3** of the EIA, which would seek to co-ordinate the Project's vessels in a manner that does not disrupt other vessels and their required activities to a significant degree. The use of a **Fisheries Mitigation, Monitoring and Communication Plan, Volume 3** of the EIA would also seek to target the Project's potential effects on local fishing industries to ensure the Project does not compromise local fishing. The extensive use of embedded environmental measures aids in demonstrating the extent to which the Project aims to reduce its potential effects on other marine users and commercial fisheries.

6.3.1.3 Furthermore, the Project commits to protecting landscape, seascape and cultural heritage, reducing visual and environmental impacts through careful siting and design, and implementing robust monitoring and adaptive management during construction, operation and decommissioning stages. Together, this ensures compliance with Schedule 9 obligations on navigation and amenity.

6.4 PLANNING BALANCE

6.4.1.1 The lengths to which the Project has sought to minimise its potential adverse effects can be observed through the majority of identified potential adverse effects being Negligible Adverse or

Minor Adverse and Not Significant. These adverse effects are easily outweighed by national benefits the Project would provide. The EIAR aspect chapters that identify such negligible adverse or minor adverse effects include:

- **Chapter 6: Socio-Economics, Volume 2a**
- **Chapter 7: Climate Resilience, Volume 2a**
- **Chapter 8: Climate – Greenhouse Gases, Volume 2a**
- **Chapter 9: Physical and Coastal Processes, Volume 2a**
- **Chapter 10: Marine Sediment and Water Quality, Volume 2a**
- **Chapter 11: Benthic and Intertidal Ecology, Volume 2a**
- **Chapter 12: Fish Ecology, Volume 2a**
- **Chapter 13: Marine Mammals, Volume 2a**
- **Chapter 14: Marine and Nearshore Ornithology, Volume 2a**
- **Chapter 16: Shipping and Navigation, Volume 2a**
- **Chapter 17: Military and Civil Aviation, Volume 2a**
- **Chapter 19: Offshore Airborne Noise, Volume 2a**
- **Chapter 20: Other Sea Users, and Recreation, Volume 2a**
- **Chapter 21: Commercial Fisheries, Volume 2a**
- **Chapter 22: Offshore Human Health, Volume 2a**

6.4.1.2 As demonstrated by the findings of these chapters, the Project would be in accordance with the relevant aspects of policies; GEN2, GEN3, GEN5, GEN8, GEN9, GEN10, GEN12, GEN13, GEN21, CABLES 1, CABLES 2, FISHERIES 1, FISHERIES 2, FISHERIES 3, TRANSPORT 1, TRANSPORT 2, TRANSPORT 3, TRANSPORT 4, TRANSPORT 6, REC & TOURISM 1, REC & TOURISM 2, REC & TOURISM 4, DEFENCE 1 and DEFENCE 2 of the Scottish National Marine Plan (2015). In addition to this the Project would be in accordance with the Sectoral Marine Plan for Offshore Energy (2020), the Water Environment (Water Framework Directive) Regulations (2017) and policies 2 and 11 of NPF4.

6.4.1.3 Whilst potentially significant effects are identified as a result of the Project on Seascape, Landscape and Visual Impact as identified in **Chapter 18, Volume 2a**, these effects have been fully considered in the context of the Project's policy allocation, national development status and contribution to Scotland's and the UK's climate and energy objectives. The Project is located within N4 of the Sectoral Marine Plan for Offshore Wind Energy (2020) which explicitly acknowledges that residual significant effects on seascape character may remain even after the application of mitigation at a project level. The statutory policy framework emphasises that planning decisions must be taken in accordance with the SMP unless material considerations indicate otherwise. In this case, the predicted seascape and visual impacts, while significant, are consistent with the SMP's strategic considerations for N4 and do not represent effects beyond those anticipated when the area was identified as suitable for offshore wind deployment. The identified adverse effects are localised in nature and do not undermine the strategic suitability of the site or the delivery of national policy

objectives. The national policy imperative to rapidly expand renewable energy generation, together with the specific locational support offered by the allocation of N4, carries substantial weight in the planning balance.

- 6.4.1.4 The seascape and landscape effects identified would create significant adverse effects on some of the SLQs of the South Lewis, Harris and North Uist NSA. Policy GEN7 of the Scottish National Marine Plan states that developments that affect NSA should only be permitted where they will not adversely affect the integrity of the SLQs of the NSA, or where any such effects are clearly outweighed by social, environmental or economic benefits of national importance. The adverse landscape and seascape effects, including those effects on the SLQs, therefore need to be considered against the project benefits.
- 6.4.1.5 A wide range of socio-economic benefits are identified within **Chapter 6, Volume 2a** of the EIAR. The demand for local goods and services, provision of employment and business for private local suppliers and businesses, associated with the Project's construction, is expected to improve economic activity within the local area. The Project is therefore expected to give rise to significant beneficial effects in relation to employment.
- 6.4.1.6 In addition to the Project's provision of approximately 900MW of clean, renewable energy, significant beneficial effects are anticipated in relation to GHG and the decarbonisation of Scotland and the UK's electricity network (as identified within **Chapter 8: Greenhouse Gases, Volume 2a** of the EIAR). The Project is expected to offset its lifecycle emissions after year 10 of its operational life, with a net carbon saving of 2,046,701 (tCO₂e/year) thus demonstrating the Project's contribution to GHG reduction. The GHG and Socio-Economic effects that would be generated by the Project are therefore in accordance with relevant aspects of policies GEN2, GEN 3 and GEN 5 of Scotland's National Marine Plan (2015) and Policy 11 of NPF4.
- 6.4.1.7 The Project would deliver a range of significant benefits. Fundamentally, the Project would aid in the meeting of the following national aims by providing in the region of 900MWE of offshore renewable energy:
- UK Government's Clean Power 2030 – aim for 43-50GW of offshore wind capacity by 2030, with a further target of 72-89GW of offshore wind capacity by 2035;
 - Draft Energy Strategy and Just Transition Plan 2023 – aim for Scotland to hit at least 20GW of renewable electricity generation capacity by 2030;
 - Offshore Wind Policy Statement 2020 and 2025 update – aim of 40GW of new offshore wind capacity by 2035-2040 – highlighting a continued and future demand for offshore wind development.
- 6.4.1.8 The Project benefits are also considered to be key to showing that the Project can be delivered for imperative reasons of overriding public interest, should the appropriate assessment undertaken by Scottish Ministers identify that there would be adverse effects on the integrity of European sites.

This would be in accordance with Policy GEN 9 of the Scottish National Marine Plan and Policy 4 of NPF4.

7 OVERALL CONCLUSIONS

- 7.1.1.1 This Planning Statement demonstrates that national and local planning policy strongly supports the Project. It has assessed the Project against the relevant policies of Scotland's National Marine Plan (2015) and NPF4 and has been informed by the contents of the Sectoral Marine Plan for Offshore Wind Energy (2020) and Draft Updated Sectoral Marine Plan (2025). The Planning Statement has also been informed by the assessments within the accompanying EIAR. This approach ensures that due regard has also been given to the duties set out under s.36 and Schedule 9 of the Electricity Act 1989, and that the Project could proceed under the terms of the Habitats Regulations.
- 7.1.1.2 Section 4 establishes the clear need for, and benefits of, the Project, highlighting its contribution to national and local climate and energy objectives, socio-economic growth, and the delivery of strategic renewable energy infrastructure. The Project will support Scotland's transition to net zero emissions and deliver significant economic and community benefits.
- 7.1.1.3 The Planning Statement's planning assessment is set out in Section 5. The relevant policies and various offshore EIA aspect chapters' findings are outlined, alongside an assessment of each theme against the requirements of national policy. The section concludes that the Project is supported by, and in accordance with the relevant policies of Scotland's National Marine Plan (2015) and NPF4 and has been informed by the contents of the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020) and Draft Updated Sectoral Marine Plan (Scottish Government's 2025). In the Scottish Ministers' consideration of these effects, when determining the application, it should first be recognised that the Project is a National Development. As such, the Project benefits from strong in-principle support, with a presumption in favour of development. Significant weight should also be given to the renewable energy and GHG reduction benefits of the scheme, as required by NPF4 Policies 1 and 11 and other relevant policies.
- 7.1.1.4 Section 6 balances the planning assessment findings, concluding that whilst a limited number of significant adverse effects are anticipated, given the nature of these effects, alongside mitigation, compensation and environmental measures proposed, the Project is not considered to give rise to any policy non-compliance issues. Moreover, the Project's significant beneficial effects, related to GHG emissions reduction and socio-economics, confirm the value of the Project. Therefore, on balance, this section concludes that the Project's social, environmental and economic benefits clearly outweigh those adverse effects identified.
- 7.1.1.5 Overall, the Project receives strong support from national policy and relevant considerations and is therefore considered to be acceptable in planning terms. Accordingly, a decision to grant consent under s.36 of the Electricity Act for the Project and approval of the requested marine licences would be in accordance with national policy.

8 GLOSSARY OF TERMS AND ABBREVIATIONS

Table 8-1 Acronyms and abbreviations

Term	Definition
AC	Alternating Current
AIP	Aeronautical Information Publication
AoS	Area of Search
ATS	Air Traffic Services
BRUV	Baited Remote Underwater Video
CAA	Civil Aviation Authority
CCA	Coastal Character Area
CEMP	Construction Environmental Management Plan
CES	Crown Estate Scotland
CRI	Climate Risk Indicators
DAS	Digital Aerial Surveys
DGC	Defence Geographic Centre
eDNA	Environmental DNA
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EMF	Electromagnetic Field
ESB	Electricity Supply Board
ESJTP	Energy Strategy and Just Transition Plan
GCR	Geological Conservation Review
GHG	Greenhouse Gas
GVA	Gross Value Added
GW	Gigawatts
HDD	Horizontal Directional Drilling
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IFP	Instrument Flight Procedures
IIP	Infrastructure Investment Plan
INNS	Invasive Non-Native Species
JV	Joint Venture
km	Kilometre
LCT	Landscape Character Type
LMP	Lighting and Marking Plan
MD-LOT	Marine Directorate - Licensing Operations Team
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMMP	Marine Mammal Mitigation Protocol
MOD	Ministry of Defence
MPS	Marine Policy Statement

MSFD	Marine Strategy Framework Directive
MSL	Mean Sea Level
MW	Megawatt
NATS	National Air Traffic Services
NCCT	National Coastal Character Type
NETS	National Electricity Transmission System
nm	Nautical Miles
NMP	National Marine Plan
NPF4	National Planning Framework 4
NPS	National Policy Statement
NSA	National Scenic Area
NSR	Noise Sensitive Receptors
OAA	Option Agreement Areas
OCAS	Offshore Cable Area of Search
OEMP	Offshore Environmental Management Plan
OREI	Offshore Renewable Energy Installations
OSP	Offshore Substation Platform
OSV	Offshore Support Vessel
OFTO	Offshore Transmission Owner
OTW	Onshore Transmission Works
OTWB	Onshore Transmission Works Boundary
OWF	Offshore Wind Farm
O&M	Operation & Maintenance
PAM	Passive Acoustic Monitoring
PDE	Project Design Envelope
RAG	Red-Amber-Green
RNLI	Royal National Lifeboat Institution
SAR	Search and Rescue
SARPs	Standards and Recommended Practices
SLVIA	Seascape, Landscape and Visual Impact Assessment
SMP	Sectoral Marine Plan
SMU	Seal Monitoring Unit
SSEN	Scottish and Southern Energy Networks
s.36	Section 36
TJB	Transition Joint Bay
TTS	Temporal Threshold Shift
UK	United Kingdom
UKCP	UK Climate Projections
UKHO	UK Hydrographic Office
WFD	Water Framework Directive
WTG	Wind Turbine Generators
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

Table 8-2 Glossary

Term	Meaning
the Applicant	Spiorad na Mara Limited (the Project owner)
Climate change	A long-term trend in the variation of the climate resulting from changes in the global atmospheric and ocean temperatures and affecting mean sea level, wave height, period and direction, wind speed and storm occurrence.
Effect	Term used to express the consequence of an impact. The significance of an effect is determined by correlating the magnitude of the impact with the importance, or sensitivity, of the receptor or resource in accordance with defined significance criteria
Environmental Impact Assessment Report (EIAR)	The Environmental Impact Assessment Report (EIAR) prepared to assess the likely significant effects of the Project on the environment.
Impact	Change that is caused by an action; for example, foundation installation (action) during construction which results in habitat loss (impact).
Offshore Application	The application for a marine licence under the Marine (Scotland) Act 2010 (between 0 and 12nm) and a Section 36 consent under the Electricity Act 1989.
Offshore Project	The offshore components of the Spiorad na Mara offshore wind farm (the Project) located seaward of Mean High Water Springs (MHWS).
Onshore Application	The application for consent under the Town and Country Planning (Scotland) Act 1997 (as amended).
Onshore Transmission Works (OTW) / Onshore Project	The onshore components of the Spiorad na Mara offshore wind farm (the Project) located landward of Mean Low Water Springs (MLWS). The Applicant will seek consent for the OTW Project through a separate application and so does not form part of this application.
Project	The Spiorad na Mara offshore wind farm development. This term describes the whole development, including all offshore and onshore components.
Wind Turbine Generator (WTG)	The wind turbines that generate electricity consisting of tubular towers and blades attached to a nacelle housing mechanical and electrical generating equipment.

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