MachairWind Offshore Windfarm

Planning Statement

ScottishPower Renewables | MachairWind Offshore Windfarm

JUNE 2026

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Planning Statement

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GLOSSARY OF ACRONYMS

Term	Definition
ADLS	Aircraft Detection Lighting Systems
AEoSI	Adverse Effect on Site Integrity
ALARP	As Low As Reasonably Practicable
AoS	Areas of Search
CAA	Civil Aviation Authority
CBF	Community Benefit Fund
CCDC	Colonsay Community Development Company
CES	Crown Estate Scotland
CNP	Critical National Priority
DSLP	Development Specification and Layout Plan
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EU	European Union
GBS	Gravity Base Structure
GHG	Greenhouse Gas
GVA	Gross Value Added
GW	Gigawatt
HES	Historic Environment Scotland
HIAL	Highlands and Islands Airports Limited
HND	Holisitic Network Design
HRA	Habitats Regulations Appraisal
HVDC	High Voltage Direct Current
IAC	Inter-array Cable
IET	Islay Energy Trust
IFP	Instrument Flight Procedure
INNS	Invasive Non-Native Species
INTOG	Innovation and Targeted Oil and Gas
IROPI	Imperative Reasons of Overriding Public Interest
LAT	Lowest Astronomical Tide
LCT	Landscape Character Types
LDP2	Local Development Plan 2

Term	Definition
LLA	Local Landscape Area
LSE	Likely Significant Effects
MD-LOT	Marine Directorate Licensing and Operations Team
MHWS	Mean High Water Springs
MICT	Mull and Iona Community Trust
MLWS	Mean Low Water Springs
MoD	Ministry of Defence
MW	Megawatt
NATS	National Air Traffic Services
NCMPA	Nature Conservation Marine Protected Area
NERL	NATS (En-Route) plc
NLB	Northern Lighthouse Board
nm	Nautical Mile
NMP	National Marine Plan
NPF4	National Planning Framework 4
NPP	Nature Positive Plan
NPS	National Policy Statement
NSA	National Scenic Area
NSIP	Nationally Significant Infrastructure Projects
O&M	Operation and Maintenance
OAA	Option Agreement Area
OFTO	Offshore Transmission Owner
OnTDA	Onshore Transmission Development Area
OSP	Offshore Substation Platform
PAC	Pre-Application Consultation
PO	Plan Option
POA	Plan Option Area
PSR	Primary Surveillance Radar
RIAA	Report to Inform Appropriate Assessment
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SEAP	Socio-Economic Action Plan
SID	South Islay Development

Term	Definition
SLQ	Special Landscape Qualities
SLVIA	Seascape, Landscape and Visual Impact Assessment
SMP	Sectoral Marine Plan
SMP-OWE	Sectoral Marine Plan for Offshore Wind Energy
SPA	Special Protection Area
SPR	ScottishPower Renewables
STEM	Science, Technology, Engineering, and Mathematics
SWMID	South West Mull and Iona Development
UK	United Kingdom
UXO	Unexploded Ordnance
VP	Viewpoint
VR	Virtual Reality
WDA	Windfarm Development Area
WTG	Wind Turbine Generator

GLOSSARY OF TERMS

Term	Definition
Cable protection	Protective measure to minimise the effects of scour and hazards along the offshore cables (e.g. to prevent cable exposure or snagging of vessel anchors or fishing gear), as well as for protecting these cables at infrastructure crossing points.
Climate Change Impact	Climate Change Impact is defined as an impact from a climate hazard, such as asset damage or failure, which affects the ability of the receptor to maintain its function or purpose.
Combined Assessment	A whole-Project assessment considering interactions between the Windfarm Development Area, Offshore Export Cable Corridor and Onshore Transmission Development Area (i.e. considering impact interactions and additive effects to determine if any effects would be materially elevated from those assessed for the Windfarm Development Area-alone assessment). Due to long delays in securing confirmation of the Project's grid connection location, the level of detail available for the Offshore Export Cable Corridor and Onshore Transmission Development Area is limited and therefore the assessment is commensurate with the level of detail available at the time of carrying out the assessment. Within the upcoming Offshore Export Cable Corridor and Onshore Transmission Development Area consent applications, their respective scoping and Environmental Impact Assessment Report / Environmental Report will take account of all likely effects predicted within the WDA EIA and present updated combined assessments using the latest available information covering all aspects of the Project.
Development Area	Application boundary for consenting purposes which, for the Project, consists of a Windfarm Development Area, Offshore Export Cable Corridor, and Onshore Transmission Development Area. Separate consent and marine licence applications will be submitted for each Development Area where applicable.
Embedded mitigation measure	Mitigation measures, including industry good practice measures, that are directly incorporated into the design for the MachairWind Windfarm Development Area to avoid or reduce environmental effects.
Environmental Impact Assessment (EIA)	The process of evaluating the likely significant environmental effects of a proposed development over and above the existing circumstances (or 'baseline').
Environmental Impact Assessment (EIA) Regulations	A collective term referring to The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive as transposed by the Habitats Regulations and comprise Special Areas of Conservation and Special Protection Areas. In accordance with Scottish Government and UK Government policy, candidate SACs, potential SPAs and Ramsar sites are also afforded equivalent protection for assessment purposes, despite not being formally designated European sites.
Fishing ground	An area of water or seabed targeted by fishing activity.
Greenhouse gas	A gas in the Earth's atmosphere that traps heat by absorbing and emitting infrared radiation, a process known as the greenhouse effect. Also known by the collective shorthand "carbon".
Gross Value Added (GVA)	Measure of the value of goods and services produced in an area, industry, or sector of an economy.
Habitats Regulations	A collective term used to describe the Conservation of Habitats and Species Regulations 2017 and The Conservation (Natural Habitats, &c.) Regulations 1994.

Term	Definition
Holistic Network Design (HND) process	An integrated approach for connecting 23 GW of offshore wind (including from ScotWind projects) to Great Britain providing a recommended offshore and onshore design for a 2030 electricity network, that facilitates the Government's ambition for 50 GW of offshore wind by 2030. The recommended design in the HND has equally considered four objectives to make sure the most appropriate approach is taken forwards, including: cost to consumer, deliverability and operability, impact on environment; and impact on local communities.
Inter-array cables (IACs)	Armoured cable containing electrical and fibre optic cores which link the wind turbine generators to each other and to the offshore substation platform(s).
Landfall	The area from Mean Low Water Springs to a transition bay(s), where the offshore export cable(s) come ashore.
Lowest Astronomical Tide (LAT)	The lowest level that can be expected to occur under average meteorological conditions and under any combination of astronomical conditions.
MachairWind Offshore Windfarm	An offshore windfarm capable of exporting around 2 GW of renewable energy to the National Electricity Transmission System. MachairWind Offshore Windfarm comprises three Development Areas: • The WDA – located on the west coast of Scotland to the northwest of Islay and west of Colonsay; • The Offshore Export Cable Corridor – a preliminary boundary extending from the WDA to mean high water springs at a landfall location near Girvan, South Ayrshire; and • The Onshore Transmission Development Area – a preliminary boundary which extends landward from mean low water springs and includes the land required for the landfall of the offshore export cable(s) and their route up to but not including the proposed high voltage direct current switching station which will be developed and constructed by Transmission Owner, ScottishPower Transmission. Separate consent and licence applications will be submitted for each Development Area.
Mean High Water Springs (MHWS)	The average, over a year, of the heights of two successive high waters during those periods of 24 hours (once every fortnight) when the range of the tide is greatest.
Mean Low Water Springs (MLWS)	The average, over a year, of the heights of two successive low waters during those periods of 24 hours (once every fortnight) when the range of the tide is greatest.
National Electricity Transmission System	The high-voltage electricity power transmission network serving Great Britain which receives electricity from generators (such as offshore windfarms) and transmits that electricity to anywhere on the National Electricity Transmission System to satisfy demand.
Offshore export cable	Armoured cable containing electrical cores between the offshore substation platform(s) and landfall. Offshore export cable(s) will include bundled fibre optic cables. The offshore export cable(s) are subject to Marine Licence applications under the Marine (Scotland) Act 2010. The portion of the offshore export cable(s) located within the WDA is assessed as part of this MachairWind WDA EIA and a marine licence application to construct, alter or improve this portion has been submitted alongside the WDA application. A separate marine licence application will be submitted for the portion of the offshore export cable(s) from the WDA boundary to Mean High Water Springs.
Offshore Export Cable Corridor (ECC)	The preliminary boundary extending from the WDA to mean high water springs near Girvan, South Ayrshire and within which the offshore export cable(s) will be located. A separate marine licence application will be submitted for the offshore export cable(s) located within the Offshore ECC.
Offshore Substation Platform (OSP)	An offshore platform with a fixed foundation located within the WDA which houses electrical equipment such as transformers, switchgear, protection and control systems, and enables the windfarm's renewable electricity to be collected via inter-array cables and exported to the National Electricity Transmission System via offshore export cable(s).

Term	Definition
Offshore Substation Platform (OSP) link cables	Electrical cables which link OSPs (if more than one OSP is required). These cables will include fibre optic cores or bundled fibre optic cables. OSP link cables will be wholly located within the WDA.
Onshore Transmission Development Area (OnTDA)	The preliminary boundary which extends landward from mean low water springs and includes the land required for the landfall of the offshore export cable(s) and their route up to but not including the proposed high voltage direct current switching station which will be developed and constructed by Transmission Owner, ScottishPower Transmission. This Transmission Owner is responsible for consenting the high voltage direct current switching station. Onward connections to the National Electricity Transmission System will be consented by National Grid Electricity Transmission and ScottishPower Transmission. Where relevant, these are considered as part of cumulative effects assessment in the EIA.
Operational life	The operational life is the expected length of time from final commissioning of the WDA until the cessation of commercial operations. This is anticipated to be 35 years.
Option Agreement Area (OAA)	The seabed area awarded to ScottishPower Renewables in January 2022 through the ScotWind leasing round.
Plan Option	A spatial plan area proposed through the Sectoral Marine Plan for offshore wind energy (as adopted in 2020). As part of the ScotWind leasing round, offshore wind developers submitted bids for Plan Options which, following a successful bid, become OAAs.
Pre-construction works	Pre-construction works are activities undertaken prior to formal commencement of construction. Examples include survey works such as geotechnical and geophysical surveys and seabed preparation activities.
Rochdale Envelope	An approach to environmental assessment which aims to take account of the need for flexibility in the future evolution of the detailed project proposal. The approach is named after two court rulings concerning outline planning applications for a proposed business park in Rochdale.
Scottish Marine Area	The area of Scotland's territorial sea limit (up to 12 nautical miles from baseline) as defined in the Marine (Scotland) Act 2010.
ScotWind	A Crown Estate Scotland seabed leasing round which enabled developers to propose offshore wind projects and apply for seabed rights to plan and build windfarms in Scottish waters.
Scour protection	Protective measures to avoid sediment being eroded away from the base of the wind turbine generator foundations as a result of the flow of water.
The Applicant	The legal entity submitting consent applications for the MachairWind Offshore Windfarm, namely MachairWind Limited.
The Lighthouse	The Dubh Artach lighthouse.
The Project	MachairWind Offshore Windfarm including all its Development Areas and associated infrastructure.
Windfarm Development Area (WDA)	The application boundary within the OAA where consent will be sought for the proposed WDA infrastructure. The WDA infrastructure is subject to Section 36 consent and marine licence applications (generation and transmission) which are being applied for separately from the Offshore ECC infrastructure and OnTDA infrastructure.
WDA infrastructure	The offshore generation and transmission infrastructure located within the WDA including but not limited to: WTGs, WTG fixed foundations (and associated scour protection), OSP(s), OSP fixed foundations (and associated scour protection), IACs, OSP link and offshore export cable(s) and their associated external cable protection (insofar as these are located within the WDA) and fibre optic cables.

Term	Definition
Wind Turbine Generator (WTG)	A wind turbine generator which converts wind energy into electrical energy. Each wind turbine generator is a complex system composed of a high number of components. Typically, the main components include the rotor assembly (composed of three blades and a hub); the nacelle (containing a generator, shaft and gearbox, power electronic converter and transformer); and the tower (containing lifting equipment and the switchgear).

1 INTRODUCTION

1.1 PROJECT OVERVIEW

1. In April 2022, as part of the ScotWind leasing round, MachairWind Limited (the Applicant) entered an Option to Lease Agreement with Crown Estate Scotland (CES) for the W1 Plan Option Area (POA). W1 is one of 15 POAs that the Scottish Government identified in its Sectoral Marine Plan (SMP) for Offshore Wind Energy following comprehensive review and consultation. W1, hereinafter referred to as the Option Agreement Area (OAA), is located off the west coast of Scotland, northwest of Islay and west of Colonsay.

2. Three separate consent applications will be sought for three Development Areas relating to the Project: the Windfarm Development Area (WDA), the Offshore Export Cable Corridor (ECC) and the Onshore Transmission Development Area (OnTDA), as shown in **Plate 1.1**. Following lengthy delays stemming from the National Electricity System Operator's 2022 Holistic Network Design (HND) process, the grid connection location for the Project was finally confirmed in August 2025 to be in the vicinity of Girvan, South Ayrshire. Consequently, the focus of this Planning Statement is solely on the WDA and WDA infrastructure. Separate consent / marine licence applications will be sought for the Offshore ECC and OnTDA. For further detail refer to **Section 2** and **Chapter 3 Project Description** of the WDA Environmental Impact Assessment (EIA) Report (EIAR).

3. The Project would provide around 2 Gigawatts (GW) of renewable energy to the National Electricity Transmission System.

4. The following consents are being sought from Scottish Ministers for the WDA:

   - Consent under Section 36 of the Electricity Act 1989;
   - Two Marine Licences (for generation and transmission infrastructure assets and related activities) under the Marine (Scotland) Act 2010; and
   - A declaration under Section 36A of the Electricity Act 1989 is being made with respect to proposed generating infrastructure within the WDA and would come into effect when any approval is given by the Scottish Ministers to the Development Specification and Layout Plan covering the WDA.

1.2 THE APPLICANT

5. The Applicant is a wholly owned subsidiary of ScottishPower Renewables (SPR), a leading renewables developer and operator of both offshore and onshore wind assets throughout the UK. Focused on wind energy, smart grids and driving the change to a greener future, ScottishPower is investing £24 bn to 2028 on renewable power and transmission and distribution grids.

6. SPR is part of the Iberdrola Group, one of the world's largest utilities and leading wind energy producer. SPR is responsible for progressing Iberdrola's renewable energy projects in the UK, including managing the development, construction, and operation of offshore windfarms.

7. Iberdrola Group is a global energy company and world leader in wind energy production, with an installed renewable power capacity of over 57 GW, of which 37% is onshore wind and 3% is offshore wind. With a committed investment of €8 bn from 2025 to 2028, this will give 5.7 GW of installed Offshore capacity in 2028. This is part of the €58 bn investment plan announced in 2025 by Iberdrola, 35% of which is being invested to grow the installed capacity of Renewable power to 60 GW by 2028.

8. SPR has been actively developing renewable projects in the UK for over 30 years and currently has over 40 operational windfarm sites generating more than 3 GW of renewable energy. SPR's offshore

wind portfolio includes the 714 Megawatt (MW) East Anglia ONE project which supported approximately 3,500 jobs at the peak of construction and now supports 100 long term skilled jobs in the operational phase. SPR has created a pathway of development in the East Anglia region with a pipeline of three further projects, consisting of East Anglia ONE North, East Anglia TWO and East Anglia THREE.

9. SPR is one of the largest onshore wind operators in the UK, with over 2GW of operational capacity across 39 sites and a UK onshore wind pipeline of 3.6 GW. Five of SPR's operational onshore projects are located within Argyll and Bute, namely Clachan Flats, Cruach Mhor and Beinn an Tuirc 1, 2 and 3.

10. MachairWind Offshore Windfarm builds on SPR's long-standing presence and positive track record as a responsible onshore wind developer and good neighbour across Argyll and Bute where it has been working with, and investing in, people, communities, and businesses for more than 20 years to realise the benefits of renewable energy.

1.3 PURPOSE AND STRUCTURE OF THE PLANNING STATEMENT

11. This Planning Statement accompanies the relevant consent applications for the MachairWind WDA to support their determination. The Planning Statement explains the need for and benefits of the Project, identifies the applicable legislative and policy framework for the determination of the applications and presents an assessment of the accordance of the Project with this framework, including with reference to conclusions from the EIAR and other supporting documents.

12. This Planning Statement is structured as follows:

- **Section 1**: Introduction
- **Section 2**: Project Description
- **Section 3**: The Need for the Project and its Benefits
- **Section 4**: Pre-Application Engagement
- **Section 5**: Legislative and Policy Context
- **Section 6**: Planning Assessment
- **Section 7**: Planning Balance and Conclusions

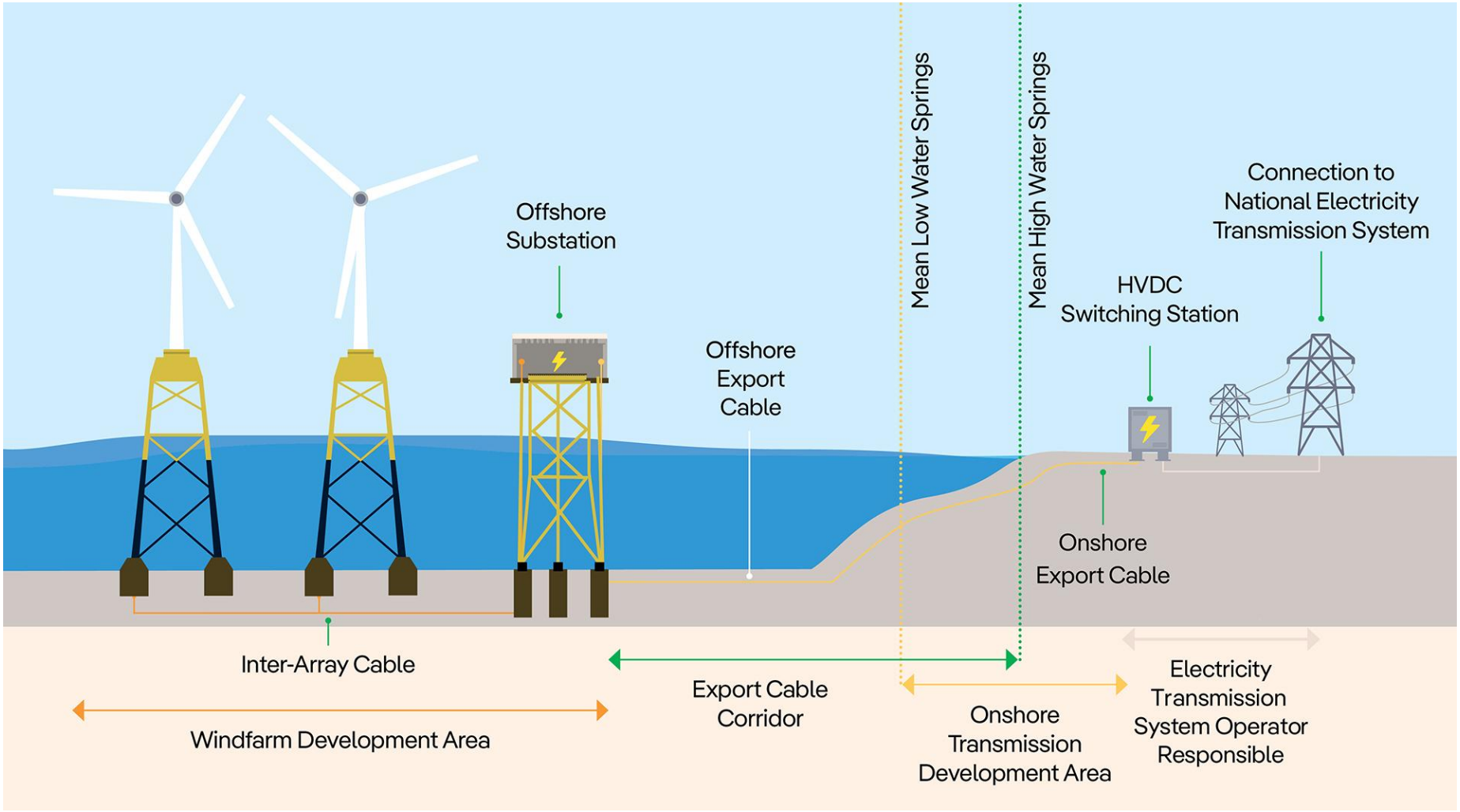


Plate 1.1 Overview of the MachairWind Development Areas (illustrative only)

2 PROJECT DESCRIPTION

2.1 SITE LOCATION

13. The WDA is located off the west coast of Scotland (see Figure 3.1 of **Chapter 3 Project Description** of the EIAR) and covers an area of a 448 km^2. The approximate distances to the nearest islands, at the closest point, are:

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

14. Key characteristics of the WDA are shown in **Table 2.1**.

Table 2.1 Key characteristics of the WDA

Parameter	Value
Total Area of the WDA (km2)	448
WDA restricted build area (km2)	51
WDA closest distance to shore (Colonsay) (km)	12.4
Maximum water depth in the WDA (m Lowest Astronomical Tide (LAT))	81.7
Average water depth in the WDA (m LAT)	53.8

2.2 SITE SELECTION AND DESIGN EVOLUTION

15. The site selection process for the WDA has been predominantly influenced by the iterative development of and consultation on the Scottish Government's Sectoral Marine Plan for Offshore Wind Energy (the SMP-OWE) which was adopted in October 2020. The WDA is located wholly within one of the 15 POAs, W1, identified within the adopted SMP. W1 has recently been re-assessed and retained within the Scottish Government's Draft Updated Sectoral Marine Plan – Offshore Wind.

16. The adopted SMP paved the way for CES's ScotWind leasing process, through which the Applicant was announced as the successful bidder for POA W1 and entered into an Option Agreement with CES in April 2022. Reflecting the full extent of POA W1, the total OAA was 754 km^2.

17. Following the ScotWind award, the Applicant carried out a review of potential constraints within or influencing the OAA, including but not limited to the following:

- Engineering constraints identified from data gathered during the 2023 site investigation campaign, including water depth and areas of shallow bedrock;
- Seascape, landscape and visual effects; and
- The presence of Dubh Artach lighthouse.

18. This review was undertaken in line with the Project Objectives identified in **Chapter 4 Site Selection and Alternatives** of the EIAR and **Section 3** below.

19. This resulted in an initial reduction in the OAA from 754 km^2 to 510 km^2 which became the WDA boundary presented at the EIA scoping stage.

20. Following feedback received from stakeholders within the Scoping Opinion, a series of project engineering and environmental constraint workshops were held to assess the remaining key constraints and limitations associated with the WDA and its associated infrastructure, to consider how these could be mitigated. This process was undertaken with regard to the Project's minimum requirements which inherently limit the extent to which the WDA can be refined. These are:

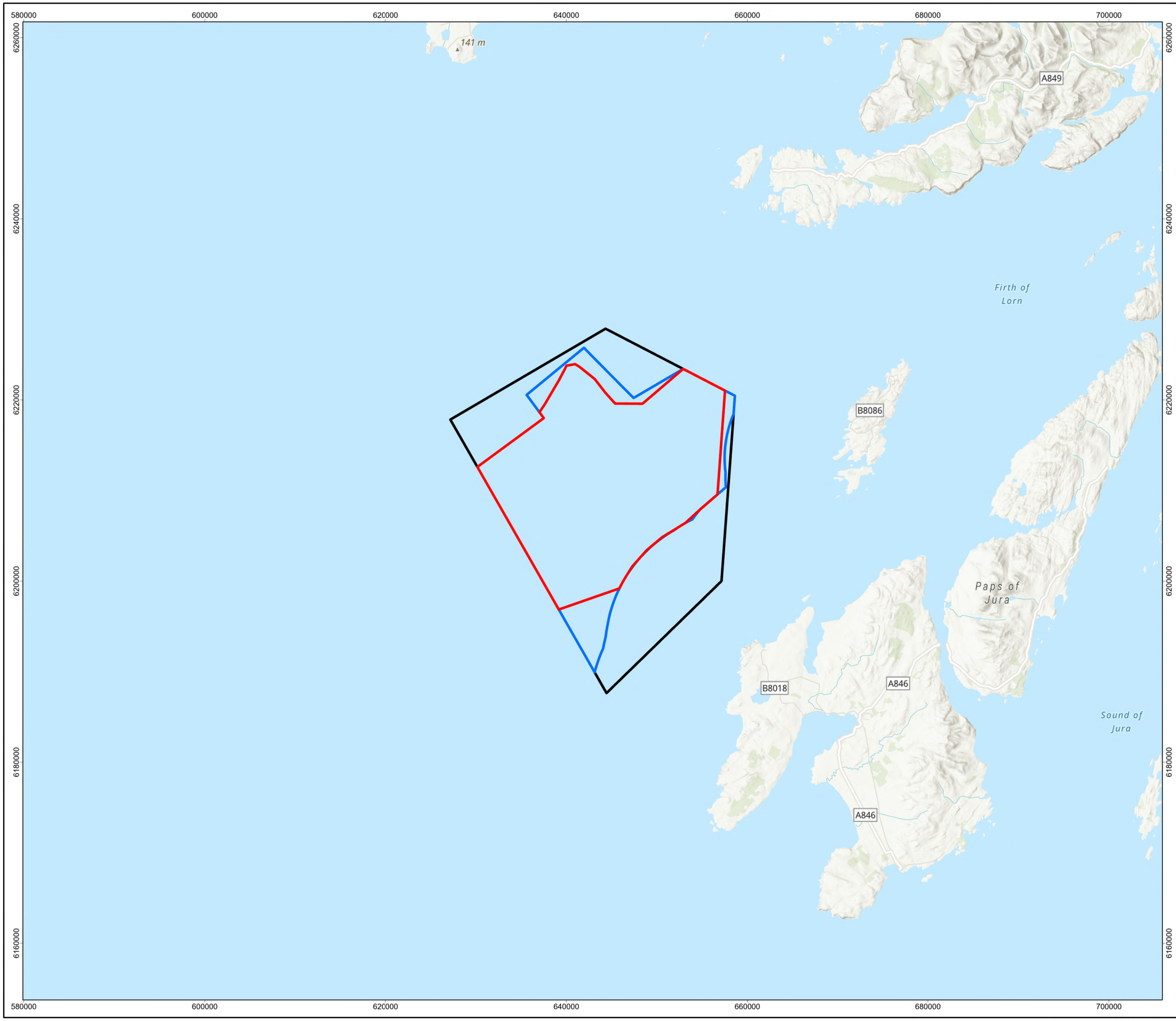
- It is anticipated that the Project will require to deploy High Voltage Direct Current (HVDC) technology, due to the long distance from the Project to the grid connection point in South Ayrshire (over 150 km). This technology has a higher initial cost than alternative systems and therefore there is a need to maximise the Project's generating capacity to ensure its economic viability; and
- The requirement to retain flexibility around turbine placement within the WDA given the rapidly evolving WTG market in relation to size and power rating. It is expected that turbines available in the years 2028-2035 will be in the range of 15 - 24 MW; however, by the time construction can start, the models currently on the market will most likely have been superseded by newer technology. As such, flexibility is required to ensure that enough turbines can be accommodated within the WDA to achieve the required generating capacity of around 2 GW based on the WTGs available on the market in the future.

21. Additional stakeholder and public consultation also informed the design evolution process, as detailed in **Chapter 4 Site Selection and Alternatives** of the EIAR and the **Pre-Application Consultation (PAC) Report**.

22. The Applicant undertook further refinements to the WDA and associated infrastructure presented at scoping. This resulted in a reduction in the WDA from 510 km^2 to 448 km^2, representing a further reduction in total area of just over 12%. A summary of these refinements are as follows:

- The northern boundary was refined to avoid water depths greater than 60 m;
- Buffer around Dubh Artach lighthouse increased from 1 nm to 2 nm around the helipad for navigational safety of maintenance vessels and helicopter access to the lighthouse, after engagement with the Northern Lighthouse Board (NLB);
- Excluded the southern tip of the site to reduce the horizontal spread of the WTGs as viewed from locations to the east, as well as reducing the possibility of isolated structure which could be of concern for shipping and navigation;
- Reduced the northeast corner of the site to reduce the detour that ferry operator DFDS would have to undertake when transiting inshore of the WDA;
- Reduced the eastern corner of the site to increase the searoom between the WDA and the shallows near Colonsay for commercial vessels and attempts to accommodate Ministry of Defence (MoD) concerns;
- Pushed the entire eastern boundary westward by at least 400 m to reduce the visual impact of the Project;
- Straightened most edges to make sharing of coordinates and assessment easier; and
- Designated a WDA restricted build area which includes the portion of the site that is not suitable for installation of Wind Turbine Generator (WTG) / Offshore Substation Platform (OSP) foundations due to deep water and shallow bedrock and reduces potential overlap with some existing fishing grounds within the WDA.

23. **Figure 1** presents the evolution of the WDA. Further detail on the WDA design evolution is provided in **Chapter 4 Site Selection and Alternatives** of the EIAR.



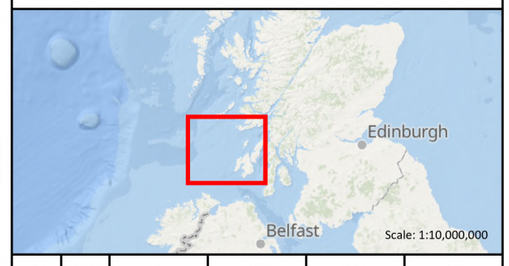
Option Agreement Area (754km²)

EIA Scoping Windfarm Development Area (510km²)

Windfarm Development Area (448km²)

N

0 2.5 5 10 15 Kilometres



REV	REV DATE	GIS CREATOR	GIS REVIEWER	TECHNICAL CHECKER	TECHNICAL APPROVER
1	05/03/2026	AB	GC	CC	CG

DRAWING NUMBER	MCW-DWF-ENV-MAP-RHS-000193		
DATUM	ETRS89	PROJECTION	UTM Zone 29N
SCALE	1:400,000	PAGE SIZE	A3
PROJECT TITLE	MachairWind		

Figure 1: Evolution of the Windfarm Development Area

NOT TO BE USED FOR NAVIGATION

Haskoning Enhancing Society Together

ScottishPower Renewables

2.3 INFRASTRUCTURE

24. As described in **Section 1.1**, three consent applications will be sought for the three separate Development Areas of the Project. The WDA infrastructure to which this Planning Statement relates and for which consent is being sought is as follows:

- WTGs and associated fixed foundations and scour protection;
- Inter-array cables (IACs) and associated cable protection;
- OSPs and associated fixed foundations and scour protection;
- OSP link cables and associated cable protection; and
- The portion of the offshore export cable(s) located within the WDA, and associated cable protection.

25. Based on the likely WTGs available at the time the Project enters construction, a project design envelope has been established which includes between 91 of the largest WTGs (335 m blade tip height) and 144 of the smallest WTGs (280 m blade tip height) WTGs. For more information see **Chapter 3 Project Description** of the WDA EIAR.

26. IACs will transmit the electricity generated by the WTGs to the OSPs.

27. OSP(s) will be necessary to collect and transform the electricity for transmission to shore through offshore export cable(s). These will accommodate electrical infrastructure such as substation equipment, controls and operational systems. There could be up to two OSPs within the WDA, which would incorporate OSP link cables to transmit electricity between them.

28. One or more offshore export cable(s) are necessary to transmit the generated electricity from the OSPs to landfall with onshore export cable(s) connecting to the onshore grid connection location. The current expectation is that the Project will connect to a new HVDC switching station to be built by the Transmission System Operator in South Ayrshire. Due to the novel, multi-terminal design of the HVDC system that MachairWind will be connected to, the configuration and design of this infrastructure is in the early stages of development and will require refinement informed by discussions with the relevant Transmission System Operators.

2.4 CONSENTING APPROACH

29. The consenting approach with details of the location of each Development Area, the key respective infrastructure and the associated consents / licences that are being sought as part of each Development Area application are detailed in **Table 2.2**.

Table 2.2 Consenting approach for MachairWind

Development Area	Location	Key Infrastructure	Consent / Licence
WDA	Within the OAA (as shown in **Figure 1**)	• WTGs, associated fixed foundations and scour protection; • OSPs, associated fixed foundations and scour protection; • IACs; • OSP link cables; • Offshore export cable(s) (insofar as these are located within the WDA application boundary and with consent being sought for up to a total length of 200 km for up to four offshore export cable(s)); and	• Section 36 • Marine Licence Application (Generation) (WTGs, IACs, OSP link cables)* • Marine Licence Application (Transmission) (OSPs and OSP link cables, WDA offshore export cable(s))* • A declaration under Section 36A of the Electricity Act 1989 is being made with respect to proposed

Development Area	Location	Key Infrastructure	Consent / Licence
		• Associated external cable protection for the above offshore cables.	generating infrastructure within the WDA and would come into effect when any approval is given by the Scottish Ministers to the Development Specification and Layout Plan covering the WDA.
Offshore ECC	A preliminary Offshore ECC has been defined and is shown in Figure 3.2 of **Chapter 3 Project Description** of the EIAR.† This extends from the WDA to Mean High Water Springs (MHWS).	• Offshore export cable(s) including any associated external cable protection.	• Marine Licence Application (Transmission) (offshore export cable(s)).
OnTDA	A preliminary OnTDA has been defined (Figure 3.3 of **Chapter 3 Project Description** the EIAR) which extends landward of Mean Low Water Springs (MLWS). †	• Landfall(s); • Onshore export cable(s) including associated onshore infrastructure; and • Temporary construction compound(s).	• Town & Country Planning (Scotland) Act 1997 Application.
* As described in the **Application for Section 36 Consent Cover Letter**, the Applicant is recommending that a condition is included within each of these licences which secures installation of OSP link cables under only one of these marine licences. At this stage, it is not clear whether the OSP link cables will form part of the generation or transmission assets and therefore this approach is intended to avoid the potential requirement for a marine licence variation following detailed design and prior to transfer of ownership of transmission assets to the Offshore Transmission Owner (OFTO). † This informs the assessment of the whole-Project effects termed the 'combined assessment' (see **Chapter 5 EIA Methodology** for further details).			

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

2.4.1 Approach to Combined Assessment

31. The WDA EIAR assesses likely significant effects in two steps by considering the source, pathway and receptors for:

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

32. This approach enables potential interactions between each Development Area to be identified and assessed, ensuring a whole Project assessment is undertaken in a manner that is meaningful and proportionate**. Chapter 5 EIA Methodology** of the EIAR sets out how the Applicant has presented the combined impact assessment of interactions between the WDA, Offshore ECC and OnTDA (i.e. considering impact interactions and additive effects to determine if any effects would be materially elevated from those assessed for the WDA alone assessment).

33. Interactions are considered where there may be spatial overlap of effects, and additive effects are considered where there may be incremental effects on the same receptor, including increased temporal effects.

34. The combined assessment has been set out in each technical topic of the WDA EIAR (commensurate with the level of detail available at the time of carrying out that assessment).

35. To inform the combined assessment, a set of assumptions were developed which includes a preliminary boundary for the Offshore ECC and OnTDA, anticipated project components and associated construction methods and timelines. These are set out in **Chapter 3 Project Description** of the EIAR, Sections 3.7 and 3.8.

36. Within the upcoming Offshore ECC and OnTDA consent applications, their respective scoping and EIARs (where required) will take account of all likely effects predicted within the WDA EIA and present updated combined assessments using the latest available information covering all aspects of the Project.

37. It should also be noted that the Project-level assessments (WDA alone) considered both generation and transmission infrastructure within the WDA (i.e. including consideration of effects associated with OSPs, OSP link cables and the portion of the offshore export cables located within the WDA).

2.4.2 Approach to Conditions

38. The consents and licences being sought for the Project will be subject to relevant conditions. For marine licences, conditions can be imposed under Section 27 of the Marine (Scotland) Act 2010 (Scottish Government, 2010) and Section 69 of the Marine and Coastal Access Act 2009 (UK Government, 2009), as appropriate. For s.36 consent under the Electricity Act 1989, the ability to impose conditions is provided by Section 36(5), with additional decision-making duties under Section 36B and Schedule 9. It is expected that the conditions placed on the consent will ensure that the construction of the WDA infrastructure can proceed in a controlled and deliverable manner.

39. The Applicant has identified several key matters which should be addressed within conditions attached to any consents and licenses granted for the Project as detailed in **Table 2.3** below. To ensure the efficient design and discharge of all required conditions, the Applicant would welcome early discussion with the Marine Directorate Licensing and Operations Team (MD-LOT) on the expectations of the structure and wording of proposed conditions.

Table 2.3 Key matters to be considered in conditions

Topic	Requirements for Conditions
Implementation and Environmental Plans	A range of EIA mitigation measures will be delivered through a series of plans, as outlined in the accompanying **Appendix 5 WDA Mitigation and Commitments Register**. The current suite of outline implementation plans which support the consenting applications will, post-consent, be converted into detailed plans and it is expected that these will be secured under conditions. In line with latest MD-LOT guidance, certain more standardised plans, and in particular those which are less reliant on details of exact project parameters, should contain sufficient information at the application stage and as such should not require an update and approval process after consents and licenses have been granted, prior to construction starting. These plans have been consulted on at pre-application stage.
Implementation of **Appendix 15 Design Strategy**: Development Specification and Layout Plan (DSLP) and Design Statement	The Applicant recommends that standard consent conditions relating to the DSLP and Design Statement are modified to include additional requirements for both the DLSP and Design Statement to be prepared in accordance with the submitted **Appendix 15 Design Strategy** insofar as is reasonably practical. It is noted that conditions requiring plans to be prepared in accordance with submitted documents insofar as reasonably practical have been attached to consents granted for other offshore windfarms in Scotland. In line with standard practice, the Applicant expects that the DSLP would be approved by the Scottish Ministers following consultation with relevant consultees including NatureScot.
OSP Link Cables	The Applicant recognises the need for similar conditions on both the generation and transmission marine licenses limiting the total number of installed OSP link cables to a maximum of four.
Lighting mitigation	The Applicant suggests that consent and licence conditions relating to the Lighting and Marking Plan should include a requirement for consideration of appropriate methods to reduce visual impacts from lighting, including consideration of an Aircraft Detection Lighting System ("ADLS") in respect of the visible aviation lighting located on the WTGs.

2.5 PROJECT PROGRAMME

40. The earliest any construction works at the WDA would start is assumed to be in 2030. It is anticipated that the maximum offshore construction period would be five years (excluding pre-construction activities such as surveys). The time periods of specific activities would vary and be encompassed within this five-year offshore construction period. **Table 2.4** sets out an indicative construction period.

41. It should be noted that the construction programme is subject to change as it is dependent on numerous factors including consent timeframes, funding mechanisms and the Project's grid connection date. The final design of the Project will also affect the construction programme, as well as weather conditions once construction starts. As such, details of the construction programme are indicative at this stage in order to provide a reasonable and realistic basis for undertaking the environmental assessments.

42. Offshore (seaward of mean low water) working hours during construction are assumed to be 24/7.

Table 2.4 Indicative offshore construction programme

WDA Component	Indicative Programme
Pre-construction activities, including WDA detailed design and discharge of pre-commencement conditions	To take place ahead of construction Year 1
WTG and OSP foundations (design, manufacture and install)	Years 1-4
Inter array cables (design, manufacture and install)	Years 1-4
Export and OSP link cables (design, manufacture and install)	Years 1-4
OSP(s) topsides (design, manufacture and install)	Years 1-4
WTG (design and manufacture)	Years 1-4
WTG (install)	Years 4-5

3 THE NEED FOR THE PROJECT AND PROJECT OBJECTIVES

43. The Applicant has developed a suite of Project Objectives to guide all aspects of the Project. These Project Objectives are designed to ensure that the Project will increase energy security, deliver clean, green energy sufficient to power up to two million homes, and reduce Greenhouse Gas (GHG) emissions thereby making a crucial contribution to delivering Net Zero targets in Scotland and the UK. Furthermore, the Project will deliver benefits to local, regional and national communities throughout its lifetime and have a positive effect on biodiversity. The Project Objectives are summarised below and detailed in full within Table 4.1 within **Chapter 4 Site Selection and Alternatives** of the EIAR, with **Sections 3.1** to **3.6** below setting out how the Project acts upon these Objectives and delivers associated benefits**:**

- Project Objective 1 - **Reduction of GHG Emissions**
- Project Objective 2 – **Delivery of Offshore Wind**
- Project Objective 3 – **Energy Security**
- Project Objective 4 – **Nature Positive Development**
- Project Objective 5 – **Delivering Social and Economic Performance**
- Project Objective 6 – **Optimise Use of Available Site**

3.1 OBJECTIVE 1 - REDUCTION OF GREENHOUSE GAS EMISSIONS

44. The Scottish Governments target to reach net zero by 2045 is secured under The Climate Change (Scotland) Act 2009. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 introduced a carbon budget-based framework for the reduction of GHG emissions, which replaced the system of interim targets set out in the previous Climate Change (Scotland) Act 2009 (Scottish Parliament, 2024) following recommendations from the independent Climate Change Committee. Carbon budgets represent legally binding caps on GHG emissions in Scotland over five-year periods.

45. Development of the Project and its estimated 2 GW operating capacity (which would generate enough power to supply up to 2 million homes) would make a substantial and crucial contribution to Scotland and the wider UK's decarbonisation and net zero targets through the estimated reduction in GHG emissions of 2,851,685 tonnes through displacement of non-renewable electricity.

46. Due to the Project being one of the few applications within the SMP process based on fixed-bottom foundation technology (already proven at commercial scale throughout the UK), the Project has fewer technological barriers to overcome prior to its operation when compared to other SMP windfarm applications based on floating substructure technology.

3.2 OBJECTIVE 2 - DELIVERY OF OFFSHORE WIND

47. Development of the Project and its estimated 2 GW operating capacity (which would generate enough power for up to 2 million homes) would make a substantial and crucial contribution to the Scottish Government's Updated Offshore Wind Ambition of deploying up to 40 GW of new offshore wind capacity between August 2025 and 2040 (Scottish Government, 2026). Deployment of offshore wind at a GW scale would exploit strong and reliable offshore wind resources, offering benefits to the electricity system including reduced intermittency and increased system efficiency.

48. As detailed in within **Chapter 19 Greenhouse Gas Assessment** of the EIAR, the electricity generation from the Project is expected to provide a net benefit in supporting ongoing efforts to decarbonise generation on the UK national electricity network. Moreover, the displaced GHG emissions across the Project's operational lifetime are greater than the reported emissions in its

construction, operation and maintenance (O&M) and decommissioning, demonstrating the positive impacts expected to emerge from the Project.

3.3 OBJECTIVE 3 - ENERGY SECURITY

49. Through the generation of 2 GW of homegrown electricity, the Project will reduce Scotland's and the wider UK's dependence on international energy sources such as natural gas, therefore providing protection against increasingly unstable global supply chains for fossil fuels. The Project will also provide greater energy security for consumers in Scotland and the wider UK, and aligns the Project with the primary objectives of the UK Government's Clean Power 2030 Action Plan to achieve 43-50 GW of installed / consented offshore wind capacity in UK waters by 2030 (UK Government, 2024).

3.4 OBJECTIVE 4 - NATURE POSITIVE DEVELOPMENT

50. Scottish Government Policy, including the Scottish Biodiversity Strategy to 2045 (Scottish Government, 2024), National Marine Plan (NMP) (Scottish Government, 2015), NMP2 Planning Position Statement (Scottish Government, 2024) and National Planning Framework 4 (NPF4) (Scottish Government, 2023), emphasises the need to tackle the nature crisis through developments that contribute towards halting biodiversity loss and supporting biodiversity enhancement. Alongside relevant mitigation measures identified within the **EIAR** to address likely impacts, the consenting applications are supported by a **Nature Positive Plan (NPP)** which goes further by setting out how the Project as a whole is considering ways to deliver meaningful biodiversity enhancements.

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

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

3.5 OBJECTIVE 5 - DELIVERING SOCIAL AND ECONOMIC PERFORMANCE

53. The Project has developed a **Socio-economic Action Plan (SEAP)** which accompanies the consenting applications. The **SEAP** has been informed by the Applicant's engagement with local communities, businesses and other key stakeholders and draws on expert insights from the MachairWind Development Economic and Social Scenarios: Opportunities and Impacts report (BiGGAR Economics, 2024).

54. The **SEAP** sets out how the Applicant will develop, build and operate MachairWind in a manner that maximises social, economic and wider benefits for its host island communities, Argyll and Bute, the West of Scotland, and Scotland more broadly. It is presented as a supporting document alongside the EIAR and explains how opportunities and positive impacts can be maximised for the benefit of local communities and businesses.

55. The Action Plan is built around five core, interlinked outcomes that represent the economic and social value that MachairWind seeks to deliver at national, regional and community levels, which are arranged under the following themes:

- **Being A Good Neighbour:** The Action Plan specifies the Applicant's commitment to regular community engagement through a Good Neighbour Feedback Loop. It highlights a buy local first policy which prioritises local spend where possible on services like catering, transport and accommodation. It also sets out commitments to ensuring a lasting host-community legacy through the establishment of Community Benefit Funds (CBFs) for the Project's operational phase. To provide transparency and accountability of operations in host communities, SPR will report on project milestones that summarise socio-economic, supply chain, and environmental contributions.
- **Maximising Local Employment Opportunities:** The Action Plan sets out the Applicant's commitments to building a skilled local talent pipeline, and coordinating essential services to ensure communities benefit sustainably throughout Project phases. Commitments include supporting a minimum of five apprenticeships or work experience placements during construction, piloting a Science, Technology, Engineering, and Mathematics (STEM) Returners Programme and STEM workshops with schools, and supporting the Fit 4 Offshore Renewables Scottish Islands & Coastal Communities Programme. Commitments are also made to collaborate on housing and service strategies and to share workforce projections.
- **Maximising Opportunities for Scottish Businesses in Supply Chains:** The Action Plan supports growth pathways and new entrants through the Offshore Wind Growth Partnership, the Clean Energy Cluster and Offshore Renewable Energy Catapult. Commitments are made to promote supply chain opportunities at local and regional events, host supplier engagement events and maintain a register of Argyll and Bute suppliers. Commitments include conducting a baseline survey of West of Scotland suppliers**,** running a "local lot" pilot project tender to engage with local small and medium size enterprises to test accessibility of procurement routes, and a requirement for Tier 1 contractors to identify, engage and contract with suppliers in Argyll and Bute. To provide transparency and accountability on Project benefits SPR will publish a biennial report setting out supply chain spend with Argyll and Bute suppliers, the number of local businesses engaged, and steps taken to address identified gaps.
- **Contributing to Placemaking:** There will be opportunities to embed the Project in the unique context and aspirations of port and host communities. Commitments include supporting the delivery of placemaking within adopted Local Development Plans and explaining planned infrastructure investment by publishing clear summaries of works. The Project will also make up to £25 million available through an Offshore Wind Stimulus Fund which will support the development of Scottish infrastructure, facilities and workforce. Placemaking contributions also include plans to conserve habitats and mitigate environmental impacts, considering post-construction reuse of assets and working with local communities to identify improvements to local facilities and services which may be eligible for support from future CBFs.
- **Contributing to Regional Economic Development**: The Applicant is committed to maximising the positive impacts of the Project on a local, regional and national basis. The plan incorporates several actions in support of regional economic development in Argyll and Bute and the Highlands and Islands. This includes commitments to align the Projects logistics, infrastructure, and skills investment with regional investment priorities where possible, and collaborating with regional stakeholders to identify and develop opportunities that generate regional benefits. This will involve maximising local job opportunities, supporting and diversifying the region's economic base, improving physical infrastructure and expanding access to education and training. Where possible, the Applicant will align with regional priorities to deliver lasting benefits beyond the operational lifetime of the Project.

56. Implementation of the **SEAP** would support national, regional and local economic goals with regards to development of the renewable energy industry. This includes:

- Scotland's National Strategy for Economic Transformation, which highlights the need to build out Scotland's offshore wind supply chain to maximise the economic benefits of the industry (Scottish Government, 2022a);
- The Highlands and Islands Regional Economic Partnership's goal to 'Maximise the economic and community benefits from renewable energy investments and drive the region's move to net zero and climate resilience/adaptation' (Highlands and Islands Regional Economic Partnership, 2025); and
- The Argyll & Bute Local Development Plan 2 (LDP2), which states that 'The Council will seek to ensure that the renewable energy industry plays an important role in developing our local economy and will encourage initiatives that promote local procurement, recruitment and training opportunities associated with all proposed new renewable energy projects' and that 'The LDP2 is committed to supporting the national objectives and targets in terms of transitioning to a net zero economy'. (Argyll and Bute Council, 2024).

3.6 OBJECTIVE 6 - OPTIMISE USE OF AVAILABLE SITE

57. As detailed in **Chapter 4 Site Selection and Alternatives**, through an iterative and collaborative process with stakeholders the Project has reduced the WDA boundary by 40% relative to the original OAA. This has been achieved while simultaneously ensuring the full 2 GW of operating capacity remains possible to achieve within the WDA. This evolution has reduced the potential effects of the Project on a wide range of receptors while ensuring the Project remains economically viable.

4 PRE-APPLICATION ENGAGEMENT

4.1 LEGISLATIVE REQUIREMENTS

58. In accordance with the Marine Licensing (PAC) (Scotland) Regulations 2013, the Project is required to undertake statutory PAC. MachairWind received a PAC Statement from MD-LOT on 11 April 2025, confirming that the proposed activities fall within the scope of the Regulations. The PAC process has incorporated a combination of public engagement and targeted consultation with statutory and non-statutory stakeholders, informing both the development of the Project and the wider consenting approach.

59. The Applicant has complied with requirements of the relevant regulations during the PAC process, which is detailed further in Section 3.1.2 of the **PAC Report** which accompanies the consenting applications.

4.2 CONSULTATION SUMMARY

4.2.1 Statutory Consultation Events

60. Two rounds of statutory consultation were delivered, the first round in May to July 2025 and the second round in October to November 2025. These featured 12 in-person drop-in sessions across the five host island communities, and 4 webinars, in addition to a virtual consultation room and interactive online map for both rounds of consultation. The combination of in-person and online events and printed and digital materials allowed attendees to access key Project information to share informed feedback at their convenience and see how their input shaped the Project.

61. A breakdown of dates, times and locations of all PAC in-person and online events is provided in **Table 4.1** below.

Table 4.1 Breakdown of statutory consultation events

Date	Time	Event	Location	Attendees
Statutory Consultation: 1st Round (26 May to 06 July 2025)				
Tues 03 June	3pm – 7.30pm	Public drop-in session	Port Mor, Port Charlotte, Islay	26
Wed 04 June	3pm – 7.30pm	Public drop-in session	Colonsay Village Hall, Scalasaig, Colonsay	31
Tue 10 June	6.30pm – 7.30pm	Webinar	Online via Microsoft Teams	2
Wed 11 June	3pm – 7.30pm	Public drop-in session	Gaelic Centre, Bowmore, Islay	13
Thu 12 June	3pm – 7.30pm	Public drop-in session	Jura Hall, Craighouse, Jura	33
Tue 17 June	3pm – 7.30pm	Public drop-in session	Creich Hall, Fionnphort, Mull	23
Wed 18 June	3pm – 7.30pm	Public drop-in session	Iona Village Hall, Iona	22
Mon 23 June	6.30 – 7.30pm	Webinar	Online via Microsoft Teams	4
Statutory Consultation: 2nd Round (20 October to 30 November 2025)				
Tue 21 October	10.30am – 2pm	Public drop-in session	Port Mor, Port Charlotte, Islay	22
Tue 21 October	4pm – 7.30pm	Public drop-in session	Ramsay Hall, Port Ellen, Islay	5
Wed 22 October	3pm – 7pm	Public drop-in session	Jura Hall, Craighouse, Jura	8

Date	Time	Event	Location	Attendees
Thu 23 October	3pm – 7pm	Public drop-in session	Colonsay Village Hall, Colonsay	30
Tue 28 October	4pm – 7.30pm	Public drop-in session	Iona Village Hall, Iona	14
Wed 29 October	3pm – 7pm	Public drop-in session	Bunessan Village Hall, Mull	26
Thu 06 November	6.30pm – 7.30pm	Webinar	Online via Microsoft Teams	3
Tue 18 November	6.30pm – 7.30pm	Webinar	Online via Microsoft Teams	11

4.2.2 Wider Engagement

62. Before the PAC process began, the Applicant undertook an extensive programme of non-statutory public engagement to raise awareness and gather feedback. These efforts included, but were not limited to, information drop-in sessions, supporting island community initiatives, and attending community events and meetings.

63. An overview of the public and community engagement activity undertaken by the Applicant is provided below. Summaries of the meetings with community groups and local organisations, in addition to the non-statutory public drop-in events hosted and local island events attended are detailed in **Table 4.2** and **Table 4.3** respectively.

64. For further detail regarding the wider engagement activities undertaken is detailed in Section 11 of the **PAC Report** that accompanies the consenting applications.

Table 4.2 Summary of meetings with community groups and local organisations

Date	Locations	Community Groups and Local Organisations	Engagement Summary
October 2022	Islay and Jura	Community Councils and Development Trusts (Islay, Jura)	Introductory meetings: • Understand local priorities (community benefits, infrastructure constraints, fisheries, supply chain opportunities); and • Strengthened stakeholder mapping.
April 2023	Islay, Jura and Colonsay	Island businesses, estates, Community Councils and Development Trusts	
February 2024	Online and in-person (Jura, Colonsay)	Community Councils and Development Trusts	Series of meetings with Community Councils and Development Trusts: • Project updates; • Outlined engagement plans for 2024/25; and • Discussions regarding establishment of a community advisory group.
March – May 2024	Online and in person (Islay, Mull and Iona)	Community Councils, Development Trusts and Islay Energy Trust (IET)	Series of meetings with Community Councils and local Development Trusts: • Project characteristics and development activities; • Ongoing engagement;

Date	Locations	Community Groups and Local Organisations	Engagement Summary
			• Update on timelines and feasibility studies; • BiGGAR Economics Opportunities and Impacts report; and Explored current and future energy demand, and associated infrastructure needs, on Islay.
Nov 2024	Islay in-person	Islay and Jura Senior Citizen Association	Presented an overview of the Project to 22 persons in an auditorium set-up and provided an open Q&A session at the end.
Nov – Dec 2024	Microsoft Teams Jura – in-person Islay – in-person	Mull Community Council South West Mull and Iona Development (SWMID) Jura Community Council Islay Community Council IET Mull and Iona Community Trust (MICT) Colonsay Community Council/Colonsay Community Development Company (CCDC)	Attended monthly meetings to provide update on: • Key development activities and project timeline; • WDA Scoping Report submission; and • Community engagement plans, including first round of PAC.
March 2025	Iona – in-person	Iona Community Council	Attended meetings to provide update focused on: • Key development activities and project timeline; • WDA Scoping Opinion (January 2025); • Social & Economic Impact Assessment; and • Community engagement plans, including first round of PAC.
May 2025	Islay – in-person	South Islay Development (SID)	Attended meeting to provide update on: • Key development activities and project timeline; • Community engagement; and • Informed on first round of PAC.
June 2025	Islay in -person	IET	Discussions relating to: • Photomontage map and virtual consultation room;

Date	Locations	Community Groups and Local Organisations	Engagement Summary
			• Planned grid infrastructure upgrades in context of future energy demand; • Regulatory challenges of a direct connection from Project to Islay; and • Energy aspirations for Islay (housing, distilleries and transport).
Feb-April 2026	Islay in-person and Microsoft Teams	CCDC Islay Community Council Jura Community Council Jura Development Trust Iona Community Council Mull Community Council SID	Attended monthly meeting to provide project update focused on: • Key findings from statutory consultations; • Project activities updates; • Introduction to SEAP; and • Questions and answers.

Table 4.3 Summary of non-statutory public drop-in events hosted and local island events attended

Date and Time	Locations	Number of Attendees	Description
25 October 2022 12 - 3pm	Jura Village Hall, Craighouse	Approximately 55 people attended these events.	Public information drop-in event in central venues. Local people met the Project team, who answered their questions and gained a better understanding of: • Education and skills needs and interests • Support for local initiatives • The distinct challenges between island communities.
27 October 2022 3 - 6pm	Islay Gaelic Centre, Bowmore		
09 August 2023 5 - 7pm	Colonsay Village Hall, Scalasaig		
10 August 2023 10 - 4pm	Islay, Jura and Colonsay Agricultural Show, Bridgend, Islay	Approximately 1,600 attended the Show, with around 180 people attending the Project's stand specifically.	Hosted a stand encouraging attendees to stop by, ask questions. Materials available included printed copies of the community newsletter and maps of the WDA. High footfall event helped the team reach community members who may not have previously heard about the Project, and/or; would not typically attend or were unable to attend the first round of public drop-in events.

Date and Time	Locations	Number of Attendees	Description
07 May 2024 3 - 6.30pm	Jura Care Centre, Craighouse	Approximately 100 people attended these events.	Second round of public information drop-in events to update on key developments, including: • Refinement of the WDA • The BiGGAR Economics Opportunities and Impacts report. The event featured information boards, printed maps and leaflets. Materials also highlighted opportunities related to supply chain investment and STEM learning.
08 May 2024 2.30 - 6.30pm	Colonsay Village Hall, Scalasaig		
09 May 2024 1.30 - 4.30pm	Islay Gaelic Centre, Bowmore		
09 May 2024 6 - 8.30pm	Ramsay Hall, Port Ellen		
12 June 2024 2.30 - 4pm	Iona Village Hall, Iona	Approximately 20 people attended these events.	Public information drop-in event in central venues. Local people met the Project team, who answered their questions and gained a better understanding of: • Support for renewable energy; • Concerns about existing infrastructure constraints; • Suggestions for future engagement and communication; and • Ongoing engagement to build strong working relationships.
12 June 2024 5 - 7.30pm	Creich Hall, Fionnphort, Mull		
08 August 2024 10 - 4pm	Islay, Jura and Colonsay Agricultural Show, Bridgend, Islay	Approximately 1,000 people attended the Show, with approximately 300 people attending the Project's stand.	Hosted a stand for the second year, including: • Information boards, printed maps and information leaflets, and merchandise; • Interactive activities for community members, especially young people.
25 March 2025 3.30 - 7.30pm	Creich Hall, Fionnphort Mull	Approximately 20 people attended these events, including families and community representatives.	Second round of public information drop-in events aimed to update on: • WDA refinement; • EIA process; • Future plans for consultation; and • Materials included information banners, printed maps and leaflets.
26 March 2025 2 - 7.30pm	Iona Village Hall, Iona		
27 – 28 April 2025	Colonsay Book Festival	Approximately 400 people attended the festival, of which	• Presence in the village hall;

Date and Time	Locations	Number of Attendees	Description
		approximately 130 were Colonsay residents.	• Materials available included information banners, printed maps and leaflets; and • Merchandise in keeping with event (branded bookmarks and notepads).
06 August 2025 10 - 4.30pm	Islay, Jura and Colonsay Agricultural Show, Bridgend, Islay	Approximately 1,200 people attended the Show, with approximately 350 people attending the Project's stand.	Hosted a stand encouraging attendees to stop by and ask questions and provided: • Interactive games, including Virtual Reality (VR) headsets showing onshore and offshore windfarms and Buzzwire task; • Materials available included printed copies of the Summer 2025 MachairWind Information Booklet and maps of the refined WDA; • Highlighted the launch of the MachairWind Small Donations Fund, with support from the Argyll and Bute Member of the Scottish Parliament; and • High-footfall event helped the team reach community members who may not have previously heard about the Project, and/or would not typically attend or were unable to attend the first round of public consultation events.
30 August 2025 11 - 4.30pm	Bunessan Agricultural Show, Ross of Mull	Approximately 1,500 people attended the Show, with approximately 80 people attending the Project's stand	Hosted an indoor stand encouraging attendees to stop by and ask questions and provided; • Interactive games, including VR headsets showing onshore and offshore windfarms; • Materials available included printed copies of the Summer 2025 MachairWind Information Booklet and maps of the refined WDA; • Highlighted the launch of the MachairWind Small Donations Fund; and • High-footfall event helped the team reach community members who may not have previously heard about the Project, and/or would not typically attend or were unable to attend the first round of public consultation events.

4.3 FEEDBACK AND APPLICANT RESPONSE

4.3.1 Statutory Consultation Round 1: Key Themes

65. The Applicant has reviewed all feedback received through official channels during the first round of Statutory Consultation. The following section provides an overview of the main themes identified from questionnaire responses and written submissions received by email and Freepost and how they have been considered by the Project.

66. The principal themes identified during the first round of Statutory Consultation were as follows:

- Energy Resilience;
- CBF;
- Local Opportunities;
- Visual / Seascape Impacts;
- Consultation Materials and Events;
- Impact Assessment;
- Tourism;
- Project Timescales; and
- Engineering.

67. These findings were shared during the second Statutory Consultation to demonstrate how stakeholder input has helped shape the development of the Project.

4.3.2 Statutory Consultation Round 2: Key Themes

68. The Applicant has reviewed all feedback received during the second of Statutory Consultation. The following section provides an overview of the main themes identified from questionnaire responses and written submissions received by email and Freepost and how they have been considered by the Project.

69. The principal themes identified during the second round of Statutory Consultation were as follows:

- CBF;
- Landscape, Visuals and Photomontages;
- Renewable Energy Support;
- Environmental and Socio-Economic Impacts;
- Engagement and Communication; and
- Project Timescales.

70. The themes identified during the first and second round of Statutory Consultation are set out in **Table 4.4** below, including a comparison as to how the community response to each theme had evolved throughout the process:

Table 4.4 Summary of how key themes have evolved – statutory consultation round 2

Theme	Previous Statutory Consultation	Second Statutory Consultation	Key Change / Continuity
Support for Renewable Energy	Broad support in principle	Broad support maintained	Consistent
Climate Change Awareness	Awareness expressed	Awareness reinforced	Consistent
Community Benefit Funding	General support for benefit	Strong demand for long-term, locally controlled and proportional benefit funds	Evolved
Governance of Benefits	Mentioned in broad terms	Clear preference for development trusts and local decision-making	Evolved
Economic Opportunities	Jobs and supply chain noted	Expanded focus on marine economy, ports, skills, decarbonisation	Expanded
Community Led Renewable Energy Developments	Limited discussion	Proposals on energy equity and local energy models	New emerging theme
Visual / Seascape Impacts	General concern and uncertainty	More technical/specific concerns (especially with night lighting), solution-focused concerns (e.g. lighting mitigation options suggested)	More concern
Environmental Stewardship	Desire for protection	Interest in partnerships and best practice delivery	Evolved
Consultation Quality	Desire for clarity	Improved understanding acknowledged; higher expectations remain	Evolved
Engagement Expectations	Ongoing engagement requested	Expectation of long-term partnership reinforced	Consistent

71. Compared with the first round of consultation, feedback from the second round did not show an increase in opposition to the Project. Instead, people's views remained broadly consistent, with many demonstrating a deeper understanding of the proposals and asking more detailed questions. This reflects growing awareness of both the Project and offshore wind more generally. It is also important to note that the number of participants in Statutory Consultation Round Two was smaller than in Round One, so the two sets of results cannot be directly compared.

4.3.3 Statutory Consultation Feedback Summary

72. The Applicant's responses to the key themes identified in both rounds of Statutory Consultation are set out in **Table 4.5**. Each theme represents a collection of comments received and is summarised alongside the Applicant's corresponding response. These responses aim to address concerns, clarify points where needed, and explain how stakeholder input has influenced decision-making. This feedback was used to refine early Project proposals and informed the second Statutory Consultation.

Table 4.5 Statutory consultation feedback and applicant response

Key Theme	Consultation Feedback	Applicant Response
First Round of Consultation		
Support for Offshore Wind	Enthusiasm about offshore wind being pursued instead of fossil fuel energy sources	Offshore windfarms are far less carbon-intensive than fossil fuel-based energy sources, particularly over their full lifecycle. Manufacturing and installation accounts for almost 80% of the lifecycle carbon emissions of an offshore windfarm (CES, 'Offshore Wind Report', 2021). Low-emission materials are being explored to minimise this impact. Any turbine blades used will be fully reused or recycled, with no landfill, supported by advancing technologies and driven by ScottishPower's 2030 zero blade landfill commitment. The Iberdrola Group and ScottishPower have a number of ambitious sustainability targets and MachairWind is being developed with sustainability embedded throughout its lifecycle, guided by emissions reduction, circularity, and nature-positive principles. The Project is supported by the offshore sustainability team and has governance mechanisms to coordinate, agree and deliver sustainability action across the project lifecycle.
Community Benefit Funding	Request for clarity in relation to the value of a CBF and when communities can access any fund.	Islay, Jura, Colonsay, Ross of Mull and Iona are recognised as the host communities of this nationally significant project and strongly believe that sharing the benefits, social and economic, is key to being a good neighbour. The specific value of the fund is not known just yet, which is very typical for projects in the pre-consent stage owing to the investment decisions on the project which are yet to come. Recommendations following consultation on Community Benefit from both the Scottish and UK Governments have not been released at the time of writing. Local people are best placed to determine how money is spent to best service the needs of their local area, reflecting their genuine needs and wants. By 2024, communities in Argyll and Bute hosting our onshore windfarms received community benefit funding in excess of £3.8million. If the Project is consented, the CBF will be operational once the windfarm is.
Economic Opportunities	Request for clarity in relation to the jobs, skills, ports, and supply-chain opportunities that the Project could generate and contribute towards locally and for the long term.	Socio-economic impacts (including jobs, skills, and local business opportunities) have been assessed by undertaking an EIA. Findings will inform actions with local partners (e.g., ports and training bodies) to support a lasting local economic legacy. The draft **SEAP** has also been shared providing clearer explanations of funding principles and potential long-term opportunities such as skills development, local supply chain participation and marine economy enhancements.
Visual/Seascape Impacts	A narrower spread of turbines across the	The spread of turbines has also been reduced through the refinement of the north-south extent of the windfarm.

Key Theme	Consultation Feedback	Applicant Response
	horizons is generally preferred to reduce visual impact.	The windfarm layout has been refined and the turbine heights reduced. The windfarm development area has been reduced by over 40% since award of the site in 2022; following the first round of public consultation, the area was reduced by 12.16%. As detailed in the 'Seascape, Landscape and Visual Impact' chapter within the EIAR, the windfarm boundary has been moved further away from coastal communities, with the closest distance to shore being 12.4 km.
Wildlife and Natural Environment	Concerns regarding the impact of the Project on sense of place and physical environment, with negative perceptions relating to impacts on marine life, wilderness and biodiversity.	The Project is located near several important seabird colonies, and migratory seabirds and marine mammals move through the region. With this in mind, extensive Digital Aerial Surveys have been undertaken to identify seabirds, marine mammals and basking sharks in addition to securing third-party survey data. Statutory and non-statutory bodies, such as NatureScot and Royal Society for the Protection of Birds (RSPB) Scotland, have been consulted throughout in addition to collaborating with stakeholders to fill data gaps, such as funding a National Trust for Scotland study to track Manx Shearwaters on the island of Lunga (Treshnish Isles). The Applicant has also been working with statutory and non-statutory consultees, such as NatureScot and RSPB Scotland, in addition to collaborating with stakeholders to fill data gaps, such as funding a National Trust for Scotland study to track Manx Shearwaters on the island of Lunga (Treshnish Isles). The Project has one of the most extensive bird datasets of any UK offshore windfarm project. The Project is committed to not only reducing its environmental impact, but to actively improving nature in the area. That's why we're developing a **NPP** for the project.
Tourism	Concerns regarding the Project deterring tourists and negatively impacting the tourism economy.	MachairWind is situated amongst a unique setting of scenic landscapes, with distinctive coastlines that are highly valued for their tranquillity and wildness. Following the first round of public consultation, refinement has been made to the windfarm area, horizontal spread of the turbines and the proximity of the windfarm to coastal communities. Working in collaboration with NatureScot, the Project has sought to agree design objectives, with a particular focus on protecting the special qualities of relevant National Scenic Areas (NSAs). These objectives will guide the detailed design of the windfarm, which will follow if the Project is consented. Responding to feedback, tourism has formed part of the socio-economic impact assessment, which has been carried out by BiGGAR Economics. When delivered sensitively and collaboratively, the Applicant believes offshore wind development can coexist with tourism.
Location/Layout of the WDA	Queries and interest around why the Project is situated where it is.	The W1 Plan Option (PO) (now known as 'MachairWind') was identified within the Scottish Government's Sectoral Marine Plan – Offshore Wind (2020). This plan was approved by the Scottish Ministers and formed the basis of the ScotWind offshore wind leasing round. As a direct result of consultation, in 2020 the original draft W1 PO footprint was significantly reduced in extent and the distance from shore was increased to mitigate potential negative impacts.

Key Theme	Consultation Feedback	Applicant Response
		In 2022, SPR won the rights to develop an offshore windfarm within the plan area (W1) through the ScotWind leasing round.
Fuel Poverty and Energy Costs	Queries and requests in relation to those living on the islands receiving discounts on household energy bills and/or receiving support towards fuel costs.	While the Applicant cannot set retail tariffs, energy-cost concerns are fully recognised. Community Benefit Funding can be steered towards initiatives that communities consider a priority; we will continue to engage on practical, locally led options. We will leverage experience from our onshore projects, for example SPR has supported communities that chose to direct funds towards initiatives to help local people address rising energy costs through a Community Energy Fund.
Second Round of Consultation		
Community Benefit Funding / Governance of Benefits	Request for clarity in relation to the value of a CBF and the governance of the funding.	CBF will be provided during the operational phase if the Project is consented. The value depends on investment decisions to be made post-consent and on guidance awaited from both UK and Scottish Governments. The Applicant will work with communities to ensure the CBF is set up in a way that suit their needs.
Economic Opportunities	Request for clarity in relation to ports and supply-chain opportunities (including infrastructure upgrades and employment) that the Project could generate and contribute towards locally.	Updated information was shared on potential port requirements and continued engagement with local authorities and port operators. The Supply Chain and Skills Fund was discussed in terms of how it could help create opportunities for training, apprenticeships, and local businesses as the Project develops.
Community Led Renewable Developments	Interest in community ownership, with a view to reduce fuel poverty.	Strong interest was acknowledged in community-energy approaches and committed to engaging with those interested in shared ownership.
Visual/Seascape Impacts	Requests to view photomontages of the windfarm at nighttime, to demonstrate lighting.	SLVIA materials were expanded for Statutory Consultation Round Two. This included: five night-time photomontages, additional daytime photomontages, refined wirelines, and a 3D virtual reality model that allowed consultees to explore views from locations most relevant to them. These tools were made available at in-person events and in the virtual consultation room to support clearer, more accessible understanding of scale, lighting and visibility.
Visual/Seascape Impacts	Queries and interest into whether the Project can reduce any associated light pollution.	Provided detailed explanations of marine and aviation lighting requirements. Questions were raised around ADLS and other “on-demand lighting” systems that are being used in Europe. The Applicant confirmed that lighting mitigation will continue to be explored post-consent with regulators including the Civil Aviation Authority (CAA) and NLB, with NatureScot input, to minimise visual effects where possible while maintaining navigational and aviation safety.
Environmental Stewardship	Interest in the species identified during environmental surveys	Technical specialists attended all in-person events and webinars to answer detailed questions on corncrake, Greenland white-fronted geese, basking sharks, marine mammals, fisheries, underwater noise,

Key Theme	Consultation Feedback	Applicant Response
	and how any negative impacts on marine mammals and birds will be mitigated.	and other ecological topics. Discussions were held in relation to past and ongoing survey work, how data is analysed, and how mitigation is being developed through the EIA.
Consultation Quality	Consensus that the updated photomontages combined with the 3D virtual reality model make it easier to understand the visual impact of the Project.	Additional viewpoints were displayed as photomontages, from 14 viewpoints during Statutory Consultation Round One and 28 during Statutory Consultation Round Two. Clearer information boards were created and an interactive 3D virtual reality model was developed to support public understanding.
Engagement Expectations	Queries around future opportunities to engage with the Project, and most importantly, shape the Project as it evolves.	The Applicant is committed to continued long-term engagement, including exploring community-led advisory groups, stronger communication channels (newsletters, website updates, targeted local messaging), and maintaining open dialogue throughout the lifetime of the Project.

4.4 SUMMARY

73. The Applicant has delivered a comprehensive programme of engagement to ensure that local communities and stakeholders are kept informed about the evolving development proposals and have meaningful opportunities to share their views. In addition to meeting statutory obligations, the Project Team has carried out a wide range of supplementary engagement with stakeholders beyond these requirements.

74. Details of all community engagement activities are provided in the accompanying **PAC Report**. The Applicant remains committed to maintaining open communication and collaboration throughout the application process and continuing engagement during the construction, operation, and eventual decommissioning phases of the Project.

5 LEGISLATIVE AND POLICY CONTEXT

5.1 INTRODUCTION

75. This section of the Planning Statement provides an overview of the legislative and policy context for the Project, the relevant legislation and policies status and purpose, and summarises the framework against which the consenting applications will be determined. A comprehensive review of the legislative and policy context applicable to the Project is provided in **Chapter 2 Policy and Legislative Context** of the EIAR.

5.2 LEGISLATION

5.2.1 The Electricity Act 1989 (as amended)

76. The Electricity Act 1989 created the legal framework for privatising the electricity industry (HM Government, 1989). The Act allowed the establishment of new electricity companies, required to 'develop and maintain an efficient, co-ordinated and economical system of electricity supply', and 'to facilitate competition in the supply and generation of electricity'. Under Section 36, the Act establishes the regulatory regime for the construction and operation of generation stations. Reforms enacted under the Planning and Infrastructure Act 2025 aim to modernise aspects of this regime, including measures to streamline the consenting process for nationally significant clean energy projects (UK Government, 2025). At the time of writing these some reforms have come into force but associated Regulations have not yet been published.

77. As the WDA infrastructure represents an offshore generating station greater than 1 MW within the Scottish Marine Area, there is a requirement for consent under Section 36 of the Electricity Act 1989. Section 36 consent will authorise the installation and O&M of the WTGs, and IACs within the WDA.

78. In Scotland, Section 36 consents for offshore projects are authorised by Scottish Ministers and administered by the Marine Directorate within the Scottish Government.

79. Schedule 8 of the Act sets out requirements and procedures in relation to applications for Section 36 consents. Schedule 9 of the Act requires consideration to be given to the preservation of amenity and fisheries, specifically:

    3 (1) 'In formulating any relevant proposals, a licence holder or a person authorised by an exemption to generate, distribute, supply or participate in the transmission of electricity:

    a) shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and

    b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'.

    3 (3) Without prejudice to sub-paragraphs (1) and (2) above, in exercising any relevant functions each of the following, namely, a licence holder, a person authorised by an exemption to generate or supply electricity and the Secretary of State shall avoid, so far as possible, causing injuries to fisheries or to the stock of fish in any waters.

80. The Section 36 and Marine Licence applications for the Project are supported by the accompanying EIAR (prepared in accordance with the EIA Regulations (see **Section 5.4** below)), Report to Inform Appropriate Assessment (RIAA) (prepared in accordance with the Habitat Regulations (see

Section 5.2.3 below) and Nature Conservation Marine Protected Area (NCMPA) Assessment (see **Section 5.2.4** below).

81. A declaration under Section 36A of the Electricity Act 1989 is being made with respect to proposed generating infrastructure within the WDA and would come into effect when any approval is given by the Scottish Ministers to the Development Specification and Layout Plan covering the WDA. See Section 2.9.2 of **Chapter 2 Policy and Legislative Context** for further details.

5.2.2 Marine Scotland Act

82. The Marine Scotland Act 2010 established the marine planning framework in Scotland, in addition to establishing the requirement for a NMP and Regional Marine Plans in Scottish waters. Scottish Ministers are responsible for granting Marine Licences in the Scottish Inshore region (0-12 nautical mile (nm)) (Scottish Government, 2010).

83. The Applicant will apply for two Marine Licences in accordance with the Act as the entirety of the WDA is situated within the 12 nm boundary:

- One licence for generation assets, including wind turbine generators, IACs and OSP link cables[1]; and;
- One licence for transmission assets, including OSPs, OSP link cables and WDA offshore export cable.

5.2.3 Habitats Regulations

84. In 1992, the EU Directive 92/43/EEC, known as the 'Habitats Directive', was adopted to enable European Union (EU) member states to meet obligations set out under the Bern Convention. The purpose of the Habitats Directive is to maintain or restore natural habitats and wild species listed in the Annexes (I and II) at Favourable Conservation Status. Protection to meet Favourable Conservation Status is given through designation of European Sites (Special Areas of Conservation (SAC)).

85. In addition, the EU Directive 2009/147/EC, known as the 'Birds Directive', was implemented to provide a framework for conservation and management of wild birds in the EU. Annex I of the Birds Directive provides a list of rare, vulnerable, and migratory species, which are protected through the designation of Special Protection Areas (SPAs).

86. The Habitats and Birds Directives have been implemented through The Conservation of Habitats and Species Regulations 2017 and The Conservation (Natural Habitats, &c.) Regulations 1994. Changes to earlier requirements were enacted by the Conservation of Habitats and Species Amendment (EU Exit) Regulations 2019 (the 'EU Exit Regulations'). Both sets of the Habitats Regulations require the Habitats Regulations Appraisal (HRA) process to be followed where a project could affect a designated site (SPAs, SACs, proposed or candidate SPAs and SACs or Ramsar Sites), either individually or in-combination with other plans or projects, in view of the site's conservation objectives.

[1] As described in the **Application for Section 36 Consent Cover Letter**, the Applicant is recommending that a condition is included within each of these licences which secures installation of OSP link cables under only one of these marine licences. At this stage, it is not clear whether the OSP link cables will form part of the generation or transmission assets and therefore this approach is intended to avoid the potential requirement for a marine licence variation following detailed design and prior to transfer of ownership of transmission assets to the OFTO.

87. At the time of writing, the Conservation of Habitats and Species (Offshore Wind) (Miscellaneous Amendments) (Scotland) Regulations 2026 have been laid in the Scottish Parliament for scrutiny. These will amend the environmental compensation provisions of the Habitats Regulations in respect of offshore wind projects in the Scottish inshore region and are due to come into force in late May 2026.

88. In accordance with the above-mentioned Habitats Regulations, the Applicant has undertaken the relevant assessments to inform an Appropriate Assessment undertaken by the Marine Directorate. The **RIAA** has been submitted alongside the WDA EIAR and application documentation.

5.2.4 Nature Conservation Marine Protected Area Assessment

89. Scotland designates NCMPAs in inshore waters between 0 and 12 nm from shore under the Marine (Scotland) Act 2010. MPAs are designated to protect biodiversity and heritage, with specific focus on protected features (species, habitats, large scale features or geomorphological features).

90. Under Part 5 of the Marine (Scotland) Act 2010, provisions are made for the relevant public authority (in this instance, MD-LOT) to consider whether a licensable activity is capable of affecting (other than insignificantly) a protected feature in an NCMPA or any ecological or geomorphological process on which the conservation of any protected feature in an NCMPA is dependent.

91. To assess whether there is any significant risk of the licensable activity hindering the achievement of the conservation objectives of a given NCMPA, an NCMPA assessment should be completed.

92. The **Report to Inform Marine Protected Area Assessment** has been submitted alongside the WDA EIAR and has been prepared in line with the guidance provided in the Marine Scotland Nature Conservation Marine Protected Areas: Draft Management Handbook (2013).

5.2.5 Climate Change (Scotland) Act 2009, amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and Climate Change (Emissions Reduction Targets) (Scotland) Act 2024

93. The Climate Change (Scotland) Act 2009 was implemented to reduce the GHG emissions in Scotland. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (Sections 1-3) include Scotland's commitments to reducing GHG emissions (Scottish Government, 2019).

94. In November 2024, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 was introduced, which replaces the targets set out in Climate Change (Scotland) Act 2009 with a system of targets based on carbon budgets. However, the overall target of net zero by 2045 remains in place.

5.3 POLICY AND PLANS

95. Relevant policy and plans at the Scottish and UK level are detailed in this section, with **Plate 5.1** below illustrating the general hierarchy of these policies and plans, with higher-level legislation and policies informing those at lower spatial scales.

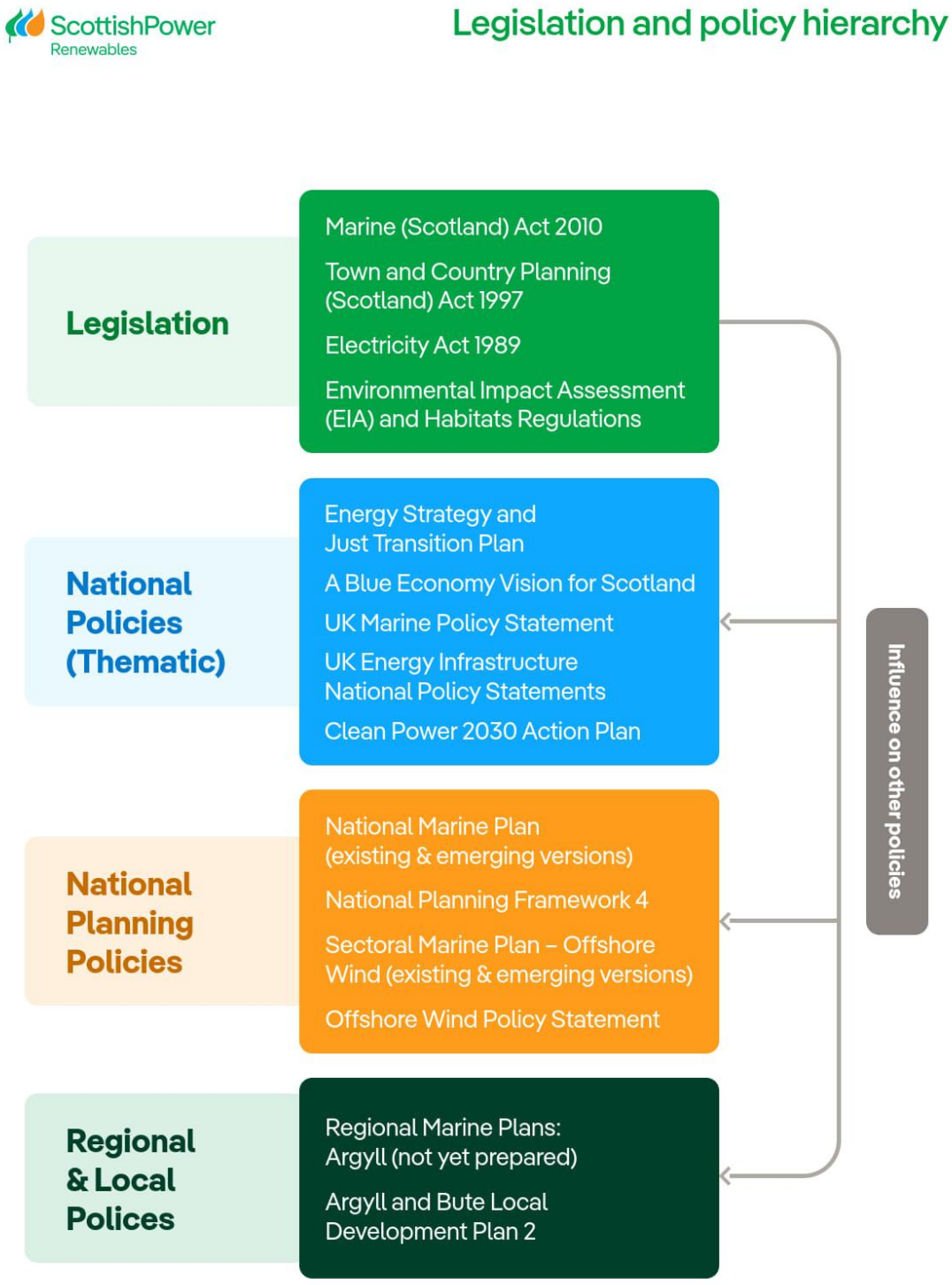


Plate 5.1 Legislation and Policy Hierarchy

5.3.1 Scottish Policy and Plans

5.3.1.1 Scotland's National Marine Plan

96. The purpose of the NMP is to set out policies for the sustainable development of Scotland's marine resources out to 200 nm. It also provides a strategic framework for marine licensing and other offshore consenting decisions. The adopted NMP dates from 2015 so does not reflect more recent national policies or offshore wind developments but, until replaced by a future NMP2, it remains in effect.

97. A series of general policies are detailed in Chapter 4 of the NMP, with those relevant to the consenting applications being summarised in **Table 5.1** below. Topic-specific policies detailed in Chapter 4 of the NMP are referred to in the relevant topic-specific chapters of the EIAR.

Table 5.1 NMP general planning principles relevant to the consenting applications

ID	Summary
GEN 1 General Planning Principle	There is a presumption in favour of sustainable development and use of the marine environment when consistent with the policies and objectives of this Plan.
GEN 2 Economic Benefit	Sustainable development and use which provides economic benefit to Scottish communities is encouraged when consistent with the objectives and policies of this Plan.
GEN 3 Social Benefit	Sustainable development and use which provides social benefits is encouraged when consistent with the objectives and policies of this Plan.
GEN 4 Co-Existence	Proposals which enable coexistence with other development sectors and activities within the Scottish marine area are encouraged in planning and decision-making processes, when consistent with policies and objectives of this Plan.
GEN 18 Engagement	Early and effective engagement should be undertaken with the general public and all interested stakeholders to facilitate planning and consenting processes.
GEN 21 Cumulative Impacts	Cumulative impacts affecting the ecosystem of the marine plan area should be addressed in decision making and plan implementation.

98. The NMP outlines objectives relating to offshore wind and marine renewable energy which intend to maximise the sustainable development of offshore wind by creating economic benefits through increasing a domestically competitive supply chain whilst contributing to decarbonisation targets. Chapter 11 of the NMP identifies key objectives of the marine planning policy for offshore wind and marine renewable energy:

- Sustainable development of offshore wind, wave and tidal renewable energy in the most suitable locations;
- Economic benefits from offshore wind, wave and tidal energy developments maximised by securing a competitive local supply chain in Scotland;
- Aligned marine and terrestrial electricity transmission grid planning and development in Scottish waters;
- Contribute to achieving the renewables target to generate electricity equivalent to 100% of Scotland's gross annual electricity consumption from renewable sources by 2020[2];

[2] It is noted this target was narrowly missed, with renewables generating electricity equivalent to 98.6% of Scotland's gross annual electricity consumption in 2020 (Scottish Government, 2022b)

- Contribute to achieving the decarbonisation target of 50g CO^2/ kWh by 2030 (to cut carbon emissions from electricity generation by more than four-fifths);
- Sustainable development and expansion of test and demonstration facilities for offshore wind and marine renewable energy devices; and
- Co-ordinated government and industry-wide monitoring.

99. In relation to the above objectives, the NMP states that 'not all of the objectives can necessarily be achieved directly through the marine planning system, but they are considered important context for planning and decision making.'

100. The NMP also sets out a series of Marine Planning Policies for Renewables, with **Table 5.2** below detailing the policies relevant to the consenting applications. Reflecting the position at the time of preparing the NMP when only limited offshore wind projects were in development, these policies focus on establishing a policy framework for the planning of further offshore renewable energy rather than setting out detailed assessment criteria for the determination of individual consenting applications.

Table 5.2 NMP Marine Planning Policies for Renewables relevant to the consenting applications

ID	Policy
Renewables 1	Proposals for commercial scale offshore wind and marine renewable energy development should be sited in the POAs identified through the Sectoral Marine Plan process. POs are considered the preferred strategic locations for the sustainable development of offshore wind and marine renewables. This preference should be taken into account by marine planners and decision makers if alternative development or use of these areas is being considered. Proposals are subject to licensing and consenting processes
Renewables 4	Applications for marine licences and consents relating to offshore wind and marine renewable energy projects should be made in accordance with the Marine Licensing Manual and Marine Scotland's Licensing Policy Guidance.
Renewables 5	Marine planners and decision makers must ensure that renewable energy projects demonstrate compliance with EIA and Habitats Regulations Appraisal legislative requirements.
Renewables 6	New and future planned grid connections should align with relevant sectoral and other marine spatial planning processes, where appropriate, to ensure a co-ordinated and strategic approach to grid planning. Cable and network owners and marine users should also take a joined-up approach to development and activity to minimise impacts on the marine historic and natural environment and other users.
Renewables 7	Marine planners and decision makers should ensure infrastructure is fit for purpose now and in future. Consideration should be given to the potential for climate change impacts on coasts vulnerable to erosion.
Renewables 8	Developers bringing forward proposals for new developments must actively engage at an early stage with the general public and interested stakeholders of the area to which the proposal relates and of adjoining areas which may be affected.
Renewables 10	Good practice guidance for community benefit from offshore wind and renewable energy development should be followed by developers, where appropriate.

101. The Project's compliance with the policies detailed in **Table 5.1** and **Table 5.2** is considered in **Section 6** of this document.

5.3.1.1.1 Updates to the NMP

102. The NMP is in the process of being updated, transitioning to the Scottish NMP2, with the aim of delivering a plan that considers the changes to the policy and legislative landscape, rapid developments in technology and the need to achieve a green recovery from the COVID-19 pandemic, as well as reflecting the improved understanding of the marine environment and the successful delivery of the Blue Economy Approach (Marine Scotland, 2022).

103. In November 2024, the Scottish Government consulted on the NMP2 Planning Position Statement. As part of this consultation, the Applicant submitted a detailed response and contributed to an industry wide response from Scottish Renewables. Following receipt of this feedback, the Scottish Government decided to postpone the upcoming draft of NMP2 to allow for further consideration and refinement (Scottish Government, 2025b).

5.3.1.2 Sectoral Marine Plan for Offshore Wind Energy

104. The SMP-OWE (Scottish Government, 2020a) identifies sustainable areas for the future development of commercial scale offshore wind energy in Scotland, including a spatial strategy to inform the seabed leasing process for the purposes of offshore wind energy (Scottish Government, 2020b). This built on the first SMP which was adopted in 2011, and the draft wind, wave and tidal plan in 2013, and was developed in accordance with the Scottish NMP.

105. The WDA is located in POA W1, as identified in the SMP for Offshore Wind. POs including W1 were subject to testing, refinement and area reduction through Strategic Environmental Assessment (SEA), HRA and plan development processes. The SMP-OWE and associated impact assessment identified relevant characteristics of POA W1 and key risks to be addressed in project level assessments and associated consenting applications.

5.3.1.2.1 Draft Updated Sectoral Marine Plan for Offshore Wind Energy

106. The SMP-OWE is undergoing an Iterative Plan Review to reflect the outcomes of the ScotWind and Innovation and Targeted Oil and Gas (INTOG) leasing rounds and Test and Demonstration projects (Scottish Government, 2025a).

107. Spatially, this draft updated Plan defines refined Option Areas (OAs) within the spatial constraints of the POs identified in the SMP-OWE 2020 and the Areas of Search (AoS) identified in the INTOG Initial Plan Framework, to reflect the outcome of the ScotWind and INTOG leasing rounds. It sets out key parameters for development which, alongside the OAs spatially defined in this draft updated SMP-OWE, should guide licensing and consenting decision-making and support projects to further progress through the leasing process, in accordance with the objectives and marine planning polices set out in the adopted NMP.

108. The draft updated SMP-OWE has been developed to ensure consistency with the objectives and principles set out within relevant plans and programmes. It brings together the assessment of environmental, social and economic impacts into one Sustainability Appraisal that assesses the potential impacts and benefits of the ScotWind and INTOG POs and the Transmission & Distribution capacity in an integrated way. It has been developed in line with the Scottish Government's established process for developing sectoral offshore energy plans.

109. An analysis of the consultation responses is underway at the time of writing. In their response to the draft updated SMP-OWE, the Applicant highlighted that the draft updated SMP did not account for the recent design refinements that the Project had committed to, noting the assessments presented in the draft updated SMP were based on highly precautionary, and in some cases unrealistic,

interpretations of the Project's design. The key findings outlined in the consultation analysis, along with the key findings arising from the SA will inform the development of the final updated SMP-OWE.

5.3.1.3 Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition

110. The outlook has changed since the Scottish Government's Offshore Wind Policy Statement was published in 2020 with a significant increase in the number of potential offshore wind developments due to the ScotWind and INTOG leasing rounds (2022 and 2023 respectively). Following a consultation in Summer 2025 on a proposal to increase Scotland's offshore wind deployment ambition in January 2026 the Scottish Government published the 'Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition' (Scottish Government, 2026). This confirms the Scottish Government's ambition of deploying up to 40 GW of new offshore wind capacity between August 2025 and 2040, over and above existing capacity. In addition, this updated ambition:

- Reaffirmed the Scottish Governments commitment to supporting the delivery of the existing projects, including ScotWind and INTOG projects;
- Clarified that no further offshore wind leasing rounds are planned in the near term; and
- Established a clear and realistic timescale of 2040 to reach the 40 GW capacity.

5.3.1.4 National Planning Framework 4

111. The NPF4 (Scottish Government, 2023) sets out Scotland's spatial principles, regional priorities, national developments and national planning policy. NPF4 presents Sustainable Places, Liveable Places and Productive Places to achieve national outcomes including benefits to the environment, communities, and health. The NPF4 contains a notable focus on tackling both the climate and nature crises.

112. There is strong policy support for developments which meet the Scottish Government's aims for net zero emissions by 2045, and halting biodiversity loss by 2030, restoring and regenerating biodiversity by 2045. Projects which evidence low and zero-carbon design and expansion of renewable energy generation will therefore be encouraged.

113. NPF4 designates certain types of projects as National Developments on the basis that they are needed to implement the national spatial strategy. This establishes the needs case for such projects. All 50+ onshore and offshore renewable electricity generating projects and associated grid connections are designated as National Developments. The proposed WDA infrastructure is therefore a National Development.

114. Renewable energy and transmission infrastructure is highlighted within the national spatial strategy to improve energy security and reduce emissions, whilst providing employment and opportunities for local communities.

115. Notwithstanding its age, the adopted NMP remains the primary consideration and reference point for assessing the MachairWind WDA consenting applications. However, policies and provisions within NPF4 of specific relevance to assessment topics are, especially in relation to the treatment of onshore receptors, are also chapters of the EIAR and due regard is given to NPF4 as a valid consideration NPF4 will be of greater relevance to the upcoming OnTDA consent application. and at this stage has been applied appropriately in the context of the accompanying EIAR.

5.3.1.5 Argyll and Bute Local Development Plan 2

116. The Argyll and Bute Local Development Plan 2 (Argyll and Bute Council, 2024) sets the spatial planning framework for Argyll and Bute, aligning with NPF4 and Scotland's net-zero and biodiversity targets and promoting sustainable development, renewable energy growth, and environmental

protection within the Argyll and Bute Council area. As the jurisdiction of the LDP only extends down to MLWS it does not cover the WDA area. However, as with NPF4, policies and provisions within the Local Development Plan 2 are of some relevance to the consideration of onshore receptors so are considered within relevant technical chapters of the EIAR. The LDP2 has therefore been used appropriately in the context of the accompanying EIAR.

5.3.2 UK Policy

5.3.2.1 National Policy Statements

117. National Policy Statements (NPS), first published by the UK Government in 2011, set out the UK Government's policy for the delivery of Nationally Significant Infrastructure Projects (NSIPs) for specific sectors in England and Wales and provide the legal framework for planning decisions. While the Project does not constitute an NSIP due its location wholly within Scottish territorial waters, the Overarching NPS for Energy (EN-1) states that '*energy policy is generally a matter reserved to UK Ministers and this NPS may therefore be a relevant consideration in planning decisions in Wales, Northern Ireland and Scotland'* (UK Government, 2025)**.** As such the NPSs remain of relevance to the Project.

118. Of the twelve total NPSs, the following three are relevant to renewable energy projects:

- The Overarching NPS for Energy (EN-1);
- NPS for Renewable Energy Infrastructure (EN-3); and
- NPS for Electricity Networks Infrastructure (EN-5).

119. All three of these NPSs were updated following consultation in 2025 and came into force in January 2026 (UK Government, 2026).

120. Within the updated NPS EN-1, the UK Government states that 'As set out in EN-3, subject to any legal requirements, the urgent need for Critical National Priority (CNP) Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible'.

121. NPS EN-5 goes on to confirm that 'As highlighted in EN-1 government has concluded that there is a CNP for the provision of nationally significant low carbon infrastructure'.

122. As such, the NPS EN-1, EN-3 and EN-5 represent relevant policy considerations for the Project.

5.3.2.2 UK Marine Policy Statement (HM Government, 2011)

123. In March 2011, the UK Marine Policy Statement was published for the purposes of section 44 of the Marine and Coastal Access Act 2009 (UK Government, 2011).

124. The Marine Policy Statement was established to partially facilitate and support the formulation of Marine Plans in accordance with the marine objectives (UK Government, 2011), including to promote sustainable economic development; enable the UK's move towards a low carbon economy, to mitigate the causes of climate change and ocean acidification and adapt to their effects; ensure a sustainable marine environment which promotes healthy, functioning marine ecosystems and protects marine habitats, species and heritage assets; and contribute to the societal benefits of the marine area, including the sustainable use of marine resources to address local social and economic issues.

5.4 ENVIRONMENTAL IMPACT ASSESSMENT

125. The following relevant legislation applies to EIA in respect of the WDA:

- The Electricity Works (EIA) (Scotland) Regulations 2017, which requires an EIA to support relevant Section 36 consent applications; and
- The Marine Works (EIA) (Scotland) Regulations 2017, which requires an EIA to support relevant Marine Licence applications.

126. The approach to EIA for the WDA is set out in detail in **Chapter 5 EIA Methodology**.

127. The EIAR that accompanies this Planning Statement contains specific information on the Project's potential environmental effects as identified through the EIA. The EIAR describes the Project's potential environmental effects during the pre-construction, construction, O&M, and decommissioning stages. The Planning Assessment detailed in **Section 1** presents a summary of the EIAR conclusions and which specific policies are of relevance to each potential impact.

6 PLANNING ASSESSMENT

6.1 PRINCIPLE OF DEVELOPMENT

128. The Project benefits from very strong national policy support in favour of renewable energy development and specific policy support for the deployment of offshore wind of the proposed scale in the proposed location.

129. The adopted NMP (2015) remains the primary consideration and reference point for assessing the MachairWind WDA consenting applications. The NMP provides a supportive policy framework, including policy RENEWABLES 1 which requires proposals for offshore wind development to be located within POs identified through the Sectoral Marine Plan process and confirms that "*Plan Options are considered the preferred strategic locations for the sustainable development of offshore wind*". It must also be recognised that the NMP pre-dates the development of the ScotWind leasing round, the outcome of which is strongly supported by the Scottish Ministers, and the adoption of even more supportive national policies including Scotland's Offshore Wind Policy Statement (2020 – updated in 2026) and NPF4 (2023).

130. MachairWind is located within the W1 POA that has been designated by the Scottish Ministers for offshore wind deployment with a realistic development capacity of 2 GW through the original SMP (2020) and Draft Updated SMP (2025). This POA has been subject to multiple rounds of boundary refinement and strategic-level assessments. It is instructive to note here that the Scottish Ministers proceeded to adopt the finalised SMP (2020), including W1 (with refined boundaries) following receipt of advice and design guidance from a wide range of consultees including NatureScot and Historic Environment Scotland (HES). The proposed location and scale of WDA infrastructure directly aligns with and draws strong policy support from the W1 allocations in both SMPs.

131. As an offshore windfarm with a capacity >50 MW and associated grid connection infrastructure, the WDA infrastructure constitutes a National Development under Class 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure as designated within NPF4. National Developments are defined as "significant developments of national importance that will help to deliver [Scotland's] spatial strategy". As a National Development, the national need for the Project is firmly established in policy terms. Policy 11a within NPF4 also makes clear that "development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported".

132. Since award of the W1 OAA, in acknowledgement of the need to consider a number of constraints and sensitivities and to optimise the use of available seabed, the WDA has undergone significant refinement, reducing its original size by approximately 40% as detailed in **Section 2.2**). This is notably different to most other current Scottish offshore wind projects which include their full OAA within consenting applications and associated EIAs. Potential further refinements to the WDA boundary and the optimisation of development parameters require detailed design work and additional surveys, which can only be undertaken with confidence following the grant of consent for the WDA consenting applications. At this stage, the WDA boundary and proposed scale of the development accords with relevant policy requirements and is considered to be appropriate.

133. Development of this fixed-bottom Project (one of the few applications within the SMP process based on the proven at commercial scale fixed-bottom foundation technology) and its estimated 2 GW operating capacity (which would generate enough power for up to 2 million homes) would make a substantial and crucial contribution to achieving the Scottish Government's Updated Offshore Wind Ambition (2026) of deploying up to 40 GW of new offshore wind capacity by 2040.

134. Having regard for all of the above, the principle of the WDA infrastructure at the proposed scale and in the proposed location has been strongly established in policy terms. This weighs heavily in favour of granting consent and forms the starting point for assessing the acceptability of predicted effects and benefits as considered below.

6.2 ENVIRONMENTAL EFFECTS OF MACHAIRWIND WDA INFRASTRUCTURE

135. This section provides the planning assessment of the WDA infrastructure for the Project and demonstrates how the WDA infrastructure is in accordance with relevant key planning and NMP policy. The section is comprised primarily of a series of tabular assessments which summarise and consider the key predicted effects of the WDA infrastructure against relevant policy requirements. Where likely significant adverse effects are anticipated as a result of the WDA infrastructure, consideration is given to what policies are of relevance to those topics and whether the requirements of those policies have been met. Effects that were assessed as being of moderate adverse/beneficial or greater are considered to be significant in EIA terms.

136. The topics assessed in the EIAR have been grouped into the following thematic areas:

- **Section 6.2.1 – The Marine Physical Environment**
  - Section 6.2.1.1 - Marine Physical Environment
- **Section 6.2.2 – The Marine Biological Environment (Excluding Offshore Ornithology)**
  - Section 6.2.2.1- Benthic Ecology, Fish (including Basking Shark) and Shellfish and Marine Mammals and Leatherback Turtle
- **Section 6.2.3 – The Marine Biological Environment – Offshore Ornithology**
  - Section 6.2.3.1 – Offshore Ornithology
- **Section 6.2.4 –Visual Environment**
  - Section 6.2.4.1 – Seascape, Landscape and Visual Impact Assessment
- **Section 6.2.5 – Cultural Environment**
  - Section 6.2.5.1 – Offshore Archaeology and Cultural Heritage
- **Section 6.2.6 – The Marine Human Environment**
  - Section 6.2.6.1 - Shipping and Navigation, Military and Civil Aviation, Infrastructure and Other Marine Users
  - Section 6.2.6.2 – **Commercial Fisheries**
- **Section 6.2.7 – Climate Context**
  - Section 6.2.5.1 - Greenhouse Gas Assessment, Climate Change Resilience
- **Section 6.2.8 – Socio-economics**
  - Section 6.2.8.1 – Socio-economics

6.2.1 The Marine Physical Environment

6.2.1.1 Marine Physical Environment

137. A summary of the outcomes of the assessment within **Chapter 7 Marine Physical Environment** of the EIAR is set out in **Table 6.1**.

Table 6.1 Summary of the outcomes of the Marine Physical Environment assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Changes in suspended sediment concentrations	M-1 M-2	Not significant	Not significant	Not significant	GEN 8 GEN 21

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
and seabed levels (All phases)	M-8 M-14 M-46				
Changes in sediment transport regime and seabed morphology (All phases)	M-8 M-14 M-46	Not significant	Not significant	Not significant	
Changes to water column structure (O&M only)	N/A	Not significant	Not significant	Not significant	

138. As shown in **Table 6.1** all residual impacts on the Marine Physical Environment were assessed as not significant, with no requirement for additional mitigation measures identified by the assessment. This conclusion has been aided by the Project's decision to remove Gravity Base Structures (GBS) as foundation options for the WTGs. Given GBS represent the largest potential footprint for WTG foundations, their removal has therefore reduced the worst-case scenario footprint of WTG foundations within the WDA, reducing the potential blockage and wake effects of structures in the water column.

6.2.1.2 Planning Assessment Conclusions for the Marine Physical Environment

139. No significant effects were identified for the Marine Physical Environment**,** subject to implementation of embedded mitigation**.** The policies of relevance to this topic relate to the prevention of avoiding adverse impact on coastal processes or contributing to coastal flooding. Section 7.12.1.2.2.1 of **Chapter 7 Marine Physical Environment** of the EIAR notes that any changes to the sediment transport regime as a result of the WDA infrastructure would not be regional in scale and would not affect coastal morphology and sediment transport processes. As there is no potential pathway for effect between the WDA infrastructure and coastal process or coastal flooding, it is therefore demonstrated that the requirements of policies GEN 8 and GEN 21 of the NMP and other relevant policy considerations are met.

6.2.2 The Marine Biological Environment (Excluding Offshore Ornithology)

6.2.2.1 Benthic Ecology, Fish (including Basking Shark) and Shellfish and Marine Mammals and Leatherback Turtle

140. A summary of the outcomes of the assessment within **Chapter 8 Benthic Ecology**, **Chapter 9 Fish (including Basking Shark) and Shellfish** and **Chapter 10 Marine Mammals and Leatherback Turtle** of the EIAR are set out in **Table 6.2** to **Table 6.4** respectively.

Table 6.2 Summary of the outcomes of the Benthic Ecology assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Increased suspended sediment concentrations and	M-8 M-14	Not significant	Not significant	N/A	GEN 9 GEN 10

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
sediment re-deposition (All phases)	M-46				GEN 21
Temporary Physical Disturbance / Habitat Loss (All phases)	M-8 M-14 M-46	Not significant	Not significant	N/A	
Introduction of marine Invasive Non-Native Species (INNS) (All phases)	M-5 M-9 M-46	Not significant	Not significant	Not significant	
Permanent habitat loss (O&M only)	M-8 M-14	Not significant	Not significant	N/A	
Colonisation of introduced hard substrate (O&M only)	M-8	Not significant	Not significant	N/A	
Interactions with Electromagnetic Fields (O&M only)	M-8 M-14	Not significant	Not significant	N/A	
Heat exposure from subsea electrical cables (O&M only)	M-8 M-14	Not significant	Not significant	N/A	

141. As shown in **Table 6.2**, all residual impacts on Benthic Ecology were assessed as not significant. The significant refinements made to the WDA throughout the pre-application stage largely avoided any interaction between the WDA infrastructure and important ecological habitats, which is reflected in the lack of significant effects identified.

142. Any post-consent refinements to the WDA would seek to avoid areas of benthic habitat, and infrastructure would be micro-sited around any previously unidentified areas of important habitat. Implementation of **Appendix 6 Outline Environmental Management Plan, Appendix 7 Marine Pollution Contingency Plan and Appendix 8 Invasive Non-Native Species Mitigation Plan** of the EIAR will also ensure that adverse effects of the Project on benthic ecology are minimised or avoided. The Project is supported by a **NPP** which outlines opportunities within the Project design that could encourage colonisation of benthic fauna.

Table 6.3 Summary of the outcomes of the Fish (including Basking Shark) and Shellfish assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Temporary Physical Disturbance (All phases)	M-4, M-8, M-14, M-52	Not significant	Not significant	Not significant	GEN 9 GEN 13 WILD FISH 1

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Increased Suspended Sediment Concentrations and Sediment Redeposition (All phases)	M-4, M-8, M-14, M-52	Not significant	Not significant	Not significant	
Underwater Noise and Vibration (All phases)	M-6, M-10	Not significant	Not significant	Not significant	
Disturbance and Displacement of Basking Shark (All phases)	M-4, M-7	Not significant	Not significant	Not significant	
Vessel Collision for Basking Shark (All phases)	M-4	Not significant	Not significant	Not significant	
Invasive Non-Native Species (All phases)	M-3, M-4, M-5, M-9	Not significant	Not significant	Not significant	
Changes in Fishing Activity (All phases)	M-8	Not significant	Not significant	Not significant	
Permanent Habitat Loss (O&M only)	M-8, M-14	Not significant	Not significant	Not significant	
Electro-Magnetic Fields (O&M only)	M-8, M-14	Not significant	Not significant	Not significant	
Introduction of Hard Substrate (O&M only)	M-8, M-52	Not significant	Not significant	Not significant	

143. As shown in **Table 6.3**, residual effects on Fish (including Basking Shark) and Shellfish were not significant with the implementation of embedded mitigation measures. No additional mitigation measures were found to be required. Implementation of **Appendix 6 Outline Environmental Management Plan, Appendix 7 Marine Pollution Contingency Plan and Appendix 8 Invasive Non-Native Species Mitigation Plan** of the EIAR will also ensure that adverse effects of the Project on to fish (including basking shark) and shellfish are minimised or avoided. The Project's **NPP** sets out enhancement opportunities within the Project design to increase habitat complexity that support fish species and provide sheltering or foraging opportunities. Consideration was also given to fish

(including basking shark) and shellfish within **Chapter 22 Inter-related Effects and Ecosystem Assessment** and this assessment also identified no significant effects on these receptors.

Table 6.4 Summary of the outcomes of the Marine Mammals and Leatherback Turtle assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Underwater noise during geophysical surveys	M-12	Not significant	Not significant	Not significant	GEN 9 GEN 13 WILD FISH 1
Underwater noise during Unexploded Ordnance (UXO) clearance (construction only)	M-11	Not significant	Not significant	Not significant	
Auditory injury (Permanent Threshold Shift) from underwater noise during piling (construction only)	M-6	Not significant	Not significant	Not significant	
Auditory injury (Temporary Threshold Shift) from underwater noise during piling (construction only)	M-6	Not significant	Not significant	Not significant	
Behavioural impacts from underwater noise during piling (construction only)	M-6	Not significant	Not significant	Not significant	
Auditory injury and behavioural impacts resulting from non-piling noise (other activities)	M-4; M-47	Not significant	Not significant	Not significant	
Auditory injury and behavioural impacts resulting from vessel noise	M-4; M-47	Not significant	Not significant	Not significant	
Barrier effects from underwater noise	M-4; M-6; M-11; M-12	Not significant	Not significant	Not significant	
Vessel Interaction (collision risk)	M-4; M-47	Not significant	Not significant	Not significant	
Disturbance at seal haul-out sites	M-4; M-47	Not significant	Not significant	Not significant	
Changes to Prey Availability	M-4; M-7; M-8; M-11; M-47	Not significant	Not significant	Not significant	

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Underwater noise from operating WTG (Operation only)	N/A	Not significant	Not significant	Not significant	

144. As shown in **Table 6.4**, effects on Marine Mammals were found to be not significant with the implementation of embedded mitigation measures. **Appendix 9 Draft Marine Mammal Mitigation Protocol** of the EIAR will inform mitigation measures to be used in future European Protected Species licence application(s), marine licence applications for UXO clearance and the piling noise mitigation strategy should the Project receive consent. Consideration was also given to Marine Mammals and Leatherback Turtle in **Chapter 22 Inter-related Effects and Ecosystems Assessment** of the EIAR, and all effects were found to be not significant.

6.2.2.2 Planning Assessment Conclusions for the Marine Biological Environment (Excluding Offshore Ornithology)

145. The policies of relevance to this topic relate to prevention of significant effects on the relevant species, habitats and designations, protection and enhancement of the health of the marine area and biodiversity, management of INNS and consideration of cumulative ecosystem effects.

146. The assessments of effects on Benthic Ecology, Fish (including Basking Shark) and Shellfish and Marine Mammals and Leatherback Turtle concluded that there would be no significant residual effects, taking into account the implementation of mitigation measures embedded within the Project design.

147. In **Chapter 22 Inter-related and Ecosystem Effects** of the EIAR, effects on these topics were also assessed as not significant.

148. With regard to the requirements of the Habitats Regulations, effects on sites designated for Annex I habitats (of relevance to Benthic Ecology) and sites designated for Annex II diadromous fish were screened out of requiring further assessment on the basis of no Likely Significant Effects (LSE) being identified. For Marine Mammals, the screening assessment identified potential LSE, and therefore assessment was undertaken within the **RIAA**. The assessment concluded that there would be no Adverse Effect on Site Integrity (AEoSI) with regard to Marine Mammals.

149. Given the above, it is demonstrated that the requirements of the NMP (policies GEN 9, GEN 10, GEN 13, GEN 21 and WILD FISH 1) and other relevant policy considerations are met. In addition, as no AEoSI were identified for Benthic Ecology, Fish and Shellfish or Marine Mammals and Leatherback Turtle, compliance with the Habitats Regulations and SMP is demonstrated.

6.2.3 The Marine Biological Environment – Offshore Ornithology

6.2.3.1 Offshore Ornithology

150. A summary of the outcomes of the assessment within **Chapter 11 Offshore Ornithology** of the EIAR is set out in **Table 6.5**.

Table 6.5 Summary of the outcomes of the Offshore Ornithology assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Direct distributional responses and displacement (Construction and Decommissioning)	M-4 M-11 M-13	Not significant	Not significant	Not significant	GEN 9 GEN 21
Indirect disturbance and displacement of prey species (Construction and Decommissioning)	M-4 M-7 M-11	Not significant	Not significant	Not significant	
Artificial construction lighting (Construction and Decommissioning)	M-53	Not significant	Not significant	Not significant	
Direct distributional responses, displacement and barrier effects (Operation)	M-4 M-13	Not significant	Not significant	Not significant	
Collision risk (Operation)	M-13 M-30	Not significant	Not significant	Not significant	
Indirect habitat loss / change for prey species (Operation)	M-4 M-7	Not significant	Not significant	Not significant	
Artificial operational lighting (Operation)	M-53	Not significant	Not significant	Not significant	
Combined displacement and collision risk (Operation)	M-4 M-13 M-30	Not significant	Not significant	Not significant	

151. As shown in **Table 6.5**, effects on Offshore Ornithology were found to be not significant with the implementation of embedded mitigation measures. The Project has been designed to reduce effects on Offshore Ornithology by implementation of a blade tip clearance / air gap of 28.42 m above highest astronomical tide, which exceeds Marine Guidance Note 654 requirements and results in decreased potential collision mortality. In addition, the Project will avoid excess lighting of the WTGs and OSPs; details are set out in **Appendix 12 Outline Lighting and Marking Plan** which will be further developed based on the final layout and as a result of discussions with relevant stakeholders should the Project receive consent. Implementation of **Appendix 6 Outline Environmental Management Plan** and **Appendix 7 Marine Pollution Contingency Plan** of the EIAR will also ensure that adverse effects of the Project on Offshore Ornithology are minimised or avoided. Consideration was also

given to Offshore Ornithology in **Chapter 22 Inter-related Effects and Ecosystems Assessment** of the EIAR, and all effects were found to be not significant.

6.2.3.2 *Planning Assessment Conclusions for Offshore Ornithology*

152. The policies of relevance to this topic relate to prevention of significant effects on the relevant species, habitats and designations, protection and enhancement of the health of the marine area and consideration of cumulative ecosystem effects.

153. The assessments of effects on Offshore Ornithology concluded that there would be no significant residual effects, taking into account the implementation of mitigation measures embedded within the Project design.

154. In **Chapter 22 Inter-related and Ecosystem Effects** of the EIAR, effects on Offshore Ornithology were also assessed as not significant.

155. With regard to the requirements of the Habitats Regulations, potential LSE were identified on ornithological receptors at the screening stage, and therefore assessment was undertaken within the **RIAA**. The RIAA concluded that there would be no AEoSI on any of the assessed SPAs a result of the Project, either alone or in-combination. On this basis, the Applicant submits that the consenting applications for the WDA infrastructure do not require a derogation under the Habitats Regulations, and that its requirements are met. The RIAA outcomes are also in accordance with the conclusions of the SMP HRA. It is also demonstrated that the requirements of the NMP (policies GEN 9 and GEN 21) and other relevant policy considerations are met.

156. It is, however, possible that the Scottish Ministers may not reach the same conclusion of no AEoSI in relation to the guillemot feature of the North Colonsay and Western Cliffs SPA. In this event, a derogation from the Habitats Regulations would need to be undertaken and compensation may be deemed necessary for the guillemot feature of the North Colonsay and Western Cliffs SPA, which has been identified for potential compensation planning on a 'without prejudice' basis, as set out in the **Without Prejudice Derogation Case** and the associated **Appendix 1 Without Prejudice Guillemot Compensation Plan**. As detailed in **Section 3**, there are Imperative Reasons of Overriding Public Interest (IROPI) for developing the Project, there are no alternative solutions and the Compensation Plan demonstrates that suitable and sufficient compensation measures can be deployed to satisfy the relevant statutory requirements.

6.2.4 Visual Environment

6.2.4.1 Seascape, Landscape and Visual Impact Assessment

157. A summary of the outcomes of the assessment within **Chapter 16 Seascape, Landscape and Visual Impacts** of the EIAR are set out in **Table 6.6**.It should be noted that the Project-level assessment has considered both generation and transmission infrastructure within the WDA.

Table 6.6 Summary of the outcomes of the Seascape Landscape and Visual Impact assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Effects on the special qualities of National	M-20, M-43, M-47	**Significant**, for the "*distinctive Paps of Jura*", "*large tracts of wild land*" and "*inaccessible Loch Tarbert*"	Not significant	No change to primary assessment	GEN 7 GEN 21

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Scenic Areas (NSAs)		Special Landscape Qualities (SLQs) of the Jura NSA Not significant for Loch na Keal, Isle of Mull and Scarba, Lunga and the Garvellachs NSAs			
Effects on the special qualities of locally designated landscapes	M-20, M-43, M-47	**Significant** on the inferred special qualities of the North and West Islay (Coast) Local Landscape Area (LLA) and Central, South and West Mull LLA Not significant for inferred special qualities of the Jura LLA	Not significant	No change to primary assessment	
Effects on onshore landscape character	M-20, M-43, M-47	**Significant** effects on six Landscape Character Types (LCTs) Not significant for three LCTs (see further detail below)	Not significant	No change to primary assessment	
Effects on coastal character	M-20, M-43, M-47	**Significant** for eight CCAs Not significant for six CCAs (see further detail below)	Not significant	No change to primary assessment	
Effects on visual receptors at viewpoints	M-20, M-43, M-47	**Significant** at 16 viewpoints Not significant at 14 viewpoints (see further detail below)	Not significant	No change to primary assessment	
Effects on visual receptors at settlements and travelling on routes	M-20, M-43, M-47	**Significant** at Colonsay and Oronsay, Islay and Mull and Iona Not significant at Tiree (see further information below)	Not significant	No change to primary assessment	
Effects on visual receptors travelling on ferry routes	M-20, M-43, M-47	**Significant** at Colonsay – Port Askaig (Islay) Ferry Not significant at Oban – Colonsay ferry	Not significant	No change to primary assessment	

158. Further detail on the identified significant effects at specific receptors is provided in **Table 6.7**.

Table 6.7 Details of identified significant effects on SLVIA receptors

Potential Effects	Receptor	Residual Significance of Effect
Effects on the special qualities of NSAs – refer to **Appendix 16.2 Assessment of Effects on Special Landscape Qualities** for details	Jura NSA	**Moderate** and **Significant**, for the "*distinctive Paps of Jura*", "*large tracts of wild land*" and "*inaccessible Loch Tarbert*" SLQs
Effects on the special qualities of locally designated landscapes	North and West Islay (Coast) LLA	**Significant**
	Central, South and West Mull LLA	**Significant**
Effects on onshore landscape character	LCT 49 – Island Mixed Farmland	**Major and significant** across Colonsay, Oronsay and in the northwest of Islay, reducing to **moderate and significant** on Iona and minor and not significant elsewhere
	LCT 58 – Sand Dunes and Machair	**Major and significant** on Colonsay and northwest Islay, minor and not significant on Tiree and Laggan Bay on Islay
	LCT 42 – Rocky Moorland – Argyll	**Major and significant** from the coastal edge and extending inland to the hills north and west of Loch Gorm, **moderate and significant** from more inland areas of the LCT on the Rinns of Islay, south of Loch Gorm, minor and not significant elsewhere
	LCT 48 – Lowland Bog and Moor	**Major and significant** from Loch Gorm, minor and not significant from Loch Gruinart and Laggan Bay
	LCT 41 – Plateau Moorland – Argyll	**Moderate and significant** in north Islay, minor and not significant in south Islay and on Jura
	LCT 44 – Boulder Moors – Argyll	**Moderate and significant** on the south and west coast of the Ross of Mull, reducing to minor and not significant elsewhere
Effects on Coastal character	CCA 5 - Sound of Iona	**Moderate and significant**
	CCA 6: Iona West Coast – Druim an Aoineidh to Ardionra	**Moderate and significant**
	CCA 7: Ross of Mull South	**Moderate and significant**
	CCA 9: Kiloran Bay to Eilean Dubh, Colonsay	**Major and significant**
	CCA 11: West Colonsay (Tighe Mhoir to Ardskenish)	**Major and significant**
	CCA 12: The Strand, Colonsay/Oronsay	**Major and significant**

Potential Effects	Receptor	Residual Significance of Effect
	CCA 13: Oronsay	**Major and significant**
	CCA 14: Rubha an t-Sailein to Glendebadel Bay, Jura	**Moderate and significant**
	CCA 15: Loch Tarbert, Jura	**Moderate and significant**
	CCA 18: Sgairail, Islay	**Moderate and significant**
	CCA 20: Ardnave Point to Rinns Point, Islay	**Moderate and significant**
Effects on visual receptors at viewpoints	Viewpoint 1: Ardnave Point, Islay	**Major and significant**
	Viewpoint 2: Saligo Bay, Islay	**Major and significant**
	Viewpoint 3: Kilchoman, Islay	**Major and significant**
	Viewpoint 4: Creag Bealach na Caillich, Islay	**Major and significant**
	Viewpoint 5: Minor Rd near Portnahaven, Islay	**Moderate and significant**
	Viewpoint 7: Beinn Bheigier, Islay	**Moderate and significant**
	Viewpoint 9: Colonsay - Port Askaig Ferry	**Moderate and significant**
	Viewpoint 10: Loch Tarbert, Jura	**Moderate and significant**
	Viewpoint 11: Beinn an Oir, Jura	**Moderate and significant**
	Viewpoint 13: Oronsay Priory, Colonsay	**Major and significant**
	Viewpoint 14: B8086 south of Lower Kilchattan, Colonsay	**Major and significant**
	Viewpoint 15: Uragaig, Colonsay	**Moderate and significant**
	Viewpoint 16: Beinn nan Guidairean, Colonsay	**Moderate and significant**
	Viewpoint 20: Erraid, Mull	**Moderate and significant**
	Viewpoint 21: Mull - Iona Ferry	**Moderate and significant**

Potential Effects	Receptor	Residual Significance of Effect
	Viewpoint 22: Dun I, Iona	**Moderate and significant**
Effects on visual receptors at settlements and travelling on routes	Colonsay and Oronsay	**Moderate and significant** to **major and significant**
	Islay	Negligible and not significant to **major and significant**
	Mull and Iona	Minor and not significant to **moderate and significant**
Effects on visual receptors travelling on ferry routes	Colonsay – Port Askaig (Islay) Ferry	**Moderate and significant**

159. As shown in **Table 6.6** and **Table 6.7**, some significant seascape, landscape and visual effects were identified in the assessment for all the aspects considered, based on a realistic worst-case scenario using the Rochdale Envelope approach (see **Chapter 16 Seascape, Landscape and Visual Impact Assessment** of the EIAR for further details). The Project is situated in a location with diverse, nationally important landscapes and multiple island communities; these sensitivities were one of the key drivers behind the significant refinements made to the WDA boundary and the design of the Project to date. Major adverse effects were primarily predicted on Colonsay and Oronsay and northwest / west Islay, all of which are located closest to the WDA. With increased distance, impacts reduce to moderate adverse, which is the lower end of a significant effect.

160. The WDA is located within the OAA included within the adopted SMP-OWE (POA W1), which acknowledged visual impacts and landscape/seascape character impacts as a risk factor to development of this site. The SEA undertaken for the Draft Updated SMP-OWE published in 2025 concluded that, for site W1, *'residual effects on landscape/seascape is assessed as moderate adverse, depending on the spatial planning, array design and turbine design of development within the OA'.* The WDA was designated within the SMP-OWE (2020) as POA W1, with recognition that the site may give rise to adverse visual effects due to its distance from shore. Despite these expected significant effects, site W1 was retained by the Scottish Government as a viable option for 2 GW of offshore wind capacity within the Draft Updated SMP (2025). Both of the SMPs were informed by strategic level assessments and advice from NatureScot. The retention of POA W1 with the same expected boundary and capacity of 2 GW indicates the Scottish Ministers' strong support in principle for offshore wind development in this specific location. This policy judgement also limits the ability to further address inherent SLVIA sensitivities associated with the location and scale of offshore wind development at a project level.

161. However, the Applicant has made significant reductions to the WDA in comparison to the original OAA (approximately 40%) which have increased the separation distance from island communities and reduced the horizontal spread of turbines in some views. NatureScot's original design guidance (2019) which was produced to accompany the (then draft) SMP became incompatible with the implementation of the subsequently adopted SMP. NatureScot confirmed during consultation that efforts to reduce SLVIA effects should instead be considered at a project level with reference to place-based design objectives and principles. As such, the Applicant and NatureScot entered into a collaborative working arrangement to help shape the Project's design development with a commitment that the process would continue throughout the pre- and post-application phases. During this process, a set of Design Objectives were developed which will guide the final design of the Project in a way that seeks to safeguard the integrity and objectives of nationally important

landscapes. This will be achieved by striving to reduce significant effects on NSAs, while recognising that some seascape and visual change as a result of the Project is unavoidable. The Design Objectives will be balanced against the wider Project Objectives, which include the Project's minimum requirements in terms of economic viability, turbine selection (see **Section 2.2**), and other constraints. The Project's design objectives are set out in **Appendix 15 Design Strategy**, along with details of how design evolution would be secured within a Section 36 consent, should it be granted (see also **Section 2.4.2**).

162. Steps taken to reduce significant effects at NSAs will have associated reductions in effects at other landscape and visual receptors.

163. The Applicant is aware of the ongoing development of ADLS for use as a potential mitigation measure to reduce the night-time effects of WTG aviation lighting. The Applicant has already initiated engagement with the CAA to explore a reduced lighting scheme and will continue this proactive engagement in the determination phase of the Project. The most appropriate mitigation option will be reflected in the final Lighting and Marking Plan, secured as embedded mitigation measure M-20.

6.2.4.2 Planning Assessment Conclusions for Visual Environment

164. The SLVIA identified significant effects on landscape and visual receptors, including the Jura NSA. As set out above, the WDA was designated within the SMP-OWE (2020) as POA W1 and retained by the Scottish Government as a viable option for 2 GW of offshore wind provision within the Draft Updated SMP (2025), which indicates strong support by the Scottish Ministers for the provision of offshore wind development in this location despite expected significant visual effects.

165. As set out in **Section 2.2**, seascape, landscape and visual impacts were one of the key considerations in the WDA refinement undertaken to date; the northern, eastern and southern boundaries of the WDA have been refined, resulting in an overall reduction of the WDA by approximately 40% when compared with the W1 Plan OAA and maximising the distance to island communities insofar as possible at this stage. The reduction in the WDA has also reduced the horizontal spread of WTGs (see **Chapter 4 Site Selection and Alternatives** of the EIAR for further details).

166. An assessment of the identified significant effects in relation to the relevant policies is set out below. The assessment was undertaken based on relevant policies from the NMP as this takes precedence in the consenting of proposals within the Scottish marine area. However, for topics such as SLVIA for which effects are predominantly experienced onshore, the requirements of NPF4 and Argyll and Bute Council's LDP2 have also been considered in the evaluation of receptor sensitivity and importance. The policy tests of relevance to SLVIA between these policy and planning documents are, however, similar and therefore afford SLVIA receptors and effects on them the same importance and level of protection in the determination process.

6.2.4.2.1 National Scenic Areas

167. Consultation was undertaken with NatureScot to identify which SLQs had potential to be affected by the Project. Of the eight SLQs applicable to the Jura NSA, five were agreed to be taken forward into the assessment as they were considered to have potential to be adversely affected by the Project. Of these five SLQs of relevance, three were predicted to be significantly affected by the Project (the *"distinctive Paps of Jura", "large tracts of wild land"* and *"inaccessible Loch Tarbert"* SLQs).

168. With regard to *"the distinctive Paps of Jura"* SLQ it is the outward views of the Project, limited to only the northwest facing slopes and the central and southern summit of the Paps and "*unparalleled views*

to the Inner Hebrides, the Mull of Kintyre and beyond" which would be impacted by the Project; the physical characteristics of the Paps of Jura and their role as landmarks would not be affected.

169. The *"large tracts of wild land"* SLQ relates primarily to areas where settlement and other human impact is absent, namely the moorland interior around the Paps of Jura and the west coast. There is very limited theoretical visibility of the Project from the moorland interior, with visibility primarily from the Paps of Jura (as noted above), hills to the south, north and east and from approximately 20 km of the west coast of the NSA. The Project would introduce an obvious but distant human impact into views which would impact upon feelings of remoteness, naturalness and wildness, but the extent and experience of effects on this SLQ would vary according to the way receptors move through the area.

170. In terms of the *"inaccessible Loch Tarbert"* SLQ, the SLQ description notes the physical characteristics of the loch and its indented coastline, and the uninhabited moorland surroundings which contribute to its inaccessibility, including its perceptual characteristics as a *"lonely and remote place"*. The Project would be theoretically visible from almost the entirety of Loch Tarbert and its coastline west of its central narrowing. The Project would introduce human elements into distant views beyond the boundary of the NSA which would reduce the perception of remoteness, but its inaccessibility, which also contributes to the SLQ, would be unaffected.

171. The magnitude of change brought about by the Project in relation to all three SLQs, based on the geographical extent, scale of change and duration and reversibility of the effect was medium; the key driver behind the effects being concluded as significant is the high sensitivity of each SLQ to the type and scale of development proposed.

172. Policy Gen 7 of the NMP states that development affecting NSAs should only be permitted where it would not adversely affect the integrity of the area or special qualities for which it has been designated, and any such adverse effects should be clearly outweighed by social, environmental or economic benefits of national importance. Offshore wind projects by their nature may give rise to unavoidable significant landscape and visual effects, and it is the way these effects have been reduced within the design of the project that is key. As noted above, it was acknowledged in the allocation of POA W1 in the SMP-OWE (2020) and the Draft Updated SMP-OWE (2025) that significant SLVIA effects would be experienced, and despite this the site was retained for 2 GW of offshore wind development. As noted above, the Project would affect the Jura NSA indirectly, giving rise to significant effects on relatively few aspects/locations within a limited subset of SLQs for which the Jura NSA is designated. Furthermore, for the purposes of EIA the assessment was based on a realistic worst case scenario, with one of the key drivers behind future design refinement, as detailed in **Appendix 15 Design Strategy**, being to reduce significant effects on the Jura NSA, which the Applicant proposes is secured by condition (see **Section 2.4.2**). It has been demonstrated in **Section 6.2.4.1** that effects have been minimised as far as possible at this stage. Given the relatively limited indirect effects on a limited subset of SLQs of this NSA, the overall integrity of the Jura NSA is not considered to be adversely affected.

173. Furthermore, the Project will provide significant benefits of national importance. As demonstrated in **Chapter 18 Socio-Economics** of the EIAR, the Project would bring about significant beneficial socio-economic effects. The Project's **SEAP** will deliver a range of benefits and enhancements structured around five core interlinked outcomes to deliver benefits at national, regional and community levels. These outcomes are grouped around key themes of maximising opportunities for Scottish businesses in supply chains, being a good neighbour, maximising local employment opportunities, contributing to placemaking and contributing to regional economic development.

174. In addition, the deployment of GW-scale offshore wind, with multiple associated benefits for the electricity system, represents efficient provision of infrastructure to meet identified energy needs. The Project's significant contribution towards Scotland's offshore wind ambition, meeting Scotland's ambitious net zero and decarbonisation targets, and the scale of reduction in GHG emissions across the Project's lifetime (see **Section 6.2.7**), are of significant benefit at a national level which outweigh the identified significant effects.

6.2.4.2.2 Locally Designated Landscapes

175. Significant effects were identified in relation to inferred special qualities of the North and West Islay (Coast) LLA and Central, South and West Mull LLA. These LLAs are located in closest proximity to the WDA. Changes to the characteristics of these LLAs are principally associated with changes to view out to sea and effects on the perceptual characteristics of the landscape, such as feelings of wildness and remoteness. Inland, the introduction of the Project would contrast with the tranquil, rural nature of the landscape and its historic character.

176. Effects on LCTs and representative viewpoints considered in the assessment that are situated within the LLAs were predicted to be of high magnitude only at the closest distances from the WDA (within 20km), with the magnitude of impact reducing to medium or low with distance. This demonstrates that the geographical area within which effects would be experienced is limited and would not affect the LLAs in their entirety.

177. Although policy GEN 7 is primarily related to effects on nationally-designated landscapes, reference is made to Scottish Planning Policy (which has since been revoked and replaced with NPF4) in relation to locally designated areas. NPF4 policy 11 and Argyll and Bute Council's LDP2 policy 71a specify similar tests to policy GEN 7. Given the limited geographical extent of significant effects, it is demonstrated that the integrity of the landscape areas is not significantly affected. In addition, as described above, the significant nationally-important benefits that the Project would provide would outweigh the identified significant effects.

6.2.4.2.3 Landscape and Coastal Character and Visual Receptors

178. As for the nationally and locally designated landscapes above, it is the LCTs and CCAs in closest proximity to the WDA that were predicted to experience significant adverse effects. Major adverse effects were identified on LCTs across Colonsay, Oronsay and northwest Islay, with effects reducing to moderate adverse significance on Iona, the Rinns of Islay and the south and west coast of the Ross of Mull. Similarly for CCAs, major adverse effects were identified on 'Kiloran Bay to Eilean Dubh, Colonsay', 'West Colonsay (Tighe Mhoir to Ardskenish)', 'The Strand, Colonsay/Oronsay' and 'Oronsay', and effects reducing to moderate adverse significance at 'Ross of Mull South', 'Rubha an t-Sailein to Glendebadel Bay, Jura', 'Loch Tarbert, Jura', 'Sgairail, Islay' and 'Ardnave Point to Rinns Point, Islay'. All other locations within the SLVIA study area were not expected to experience significant adverse effects.

179. Similarly, effects on visual receptors at identified viewpoints or at settlements and travelling on routes were of major adverse significance at the closest locations to the Project (VP14 Colonsay, VP13 Oronsay, VP 1, 2, 3, 4 northwest Islay), with effects reducing to moderate adverse at a greater distance from the WDA or from elevated positions on Islay (VP5 and 7), Colonsay (VP9, 15 and 16), Jura (VP10), Mull (VP20 and 21) and Iona (VP22). Whilst the relevant policies do not reference effects on these receptors, the nationally-significant beneficial effects of the Project and its contribution to achieving Scotland's offshore wind ambition, net zero and decarbonisation targets outweigh the identified significant effects.

6.2.4.2.4 Summary

180. The Project would give rise to some limited major adverse effects on SLVIA receptors. However, major adverse effects are not experienced at the most sensitive nationally-designated landscapes. Effects at the Jura NSA were identified on relatively few aspects/locations within a small subset of SLQs for which the area is designated, and it is therefore demonstrated that the overall integrity of the area will not be compromised. In addition, the significant adverse effects on the qualities for which the area has been designated are outweighed by the social, environmental and economic benefits of national importance which would be delivered by the Project. Further detail on the balance between the identified significant effects and the Project's social, environmental and economic benefits is set out in **Section 7**.

6.2.5 Cultural Environment

6.2.5.1 Offshore Archaeology and Cultural Heritage

181. A summary of the outcomes of the assessment within **Chapter 14 Offshore Archaeology and Cultural Heritage** of the EIAR are set out in **Table 6.8**.

Table 6.8 Summary of the outcomes of the Offshore Archaeology and Cultural Heritage assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Direct impacts to heritage assets	M-14, M-37, M-38, M-39, M-40, M-41, M-49 and M-50	Not significant (all phases)	No change	No change	GEN 6 GEN 7 GEN 21
Indirect impacts to heritage assets associated with changes to the marine physical environment	N/A	No change (All phases)	No change	No change	
Change to the setting of heritage assets	M-50	**Significant** at four Scheduled Monuments (operation only) **Significant** at two Listed Buildings (operation only) **Significant** at the Iona Conservation Area Not significant at 21 Scheduled Monuments Not significant at 6 Listed Buildings Not assessed during construction and decommissioning as effects would be most felt	No change	No change	

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
		during the operational phase			

182. As shown in **Table 6.8**, no significant effects were predicted as a result of direct or indirect impacts on heritage assets. In the case of potential heritage assets (seabed prehistory – buried channels and paleoenvironmental deposits), minor beneficial effects were identified during the construction phase as, should any deposits or features of archaeological interest be identified, examination of these would contribute to the body of scientific data available for the study of seabed prehistory within the region. Implementation of **Appendix 11 Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries** of the EIAR will also ensure that adverse effects of the Project on heritage assets are minimised or avoided.

183. Based on a realistic worst-case scenario, significant effects were predicted during the Project's operational phase as a result of changes in setting of designated heritage assets. Significant effects were predicted on scheduled monuments on Islay (Beinn a' Chaisteil, promontory fort and associated remains and Dun Bheolain, fort) and Iona (St Mary's Abbey), with noticeable changes to setting were predicted to occur.

184. Iona Abbey is also a listed building and was also predicted to experience significant effects as a result of a noticeable change to setting, along with Dubh Artach lighthouse which was predicted to experience a medium change to setting leading to significant effects. There would also be a significant effect on the Iona conservation area as a result of the Project. Further details on the effects associated with changes to setting are set out in **Appendix 14.3 Settings Assessment** of the EIAR.

185. The Project's design evolution to date and embedded mitigation measures have reduced the effect of the Project on designated assets as far as possible at this stage. Should the Project receive consent, evolution of the Project design will continue through the post-consent phase, as outlined in **Appendix 15 Design Strategy.**

6.2.5.2 Planning Assessment Conclusions for Cultural Environment

186. The Settings Assessment identified significant effects on heritage assets (Oronsay Priory and Cross (SM287), Beinn a' Chaisteil (SM13213), Dun Bheolain (SM13214) St Mary's Abbey (SM12968), Iona Abbey (LB12310), Dubh Artach lighthouse (LB12320) and Iona Conservation Area (CA468)). Consideration is given below to the policies of relevance and whether their requirements are met.

187. GEN 6 of the NMP states "Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance".

188. Paragraph 4.23 of the NMP goes on to state "[…] Designated heritage assets – representing sites of national or international significance for which statutory requirements apply. Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary to deliver social, economic or environmental benefits that outweigh the harm or loss […]". The policy requirement is therefore to avoid substantial loss or harm.

189. Harm to heritage assets is a policy concept that has been little used in Scotland, but has been the subject of extensive consideration in England, and there is a body of guidance and case law that provides useful context for its discussion, and makes it clear that substantial harm presents a high bar.

190. The test of whether harm would be substantial is independent of valuation of the asset, and therefore reference to criteria used in the EIAR for establishing the magnitude of impact are relevant. **Chapter 14 Offshore Archaeology and Cultural Heritage** of the EIAR defines a high adverse impact as where *'key elements of the asset's fabric and/or setting are lost or fundamentally altered, such that the asset's cultural significance is lost or severely compromised'*. While this represents a relatively coarse banding of magnitudes of impact up to and including total loss of a heritage asset, this is a useful lower threshold for harms that could be considered to be substantial and which would require consideration under this policy.

191. As no effects arising through change to setting have been assessed as higher than a medium magnitude of impact, it is therefore clear that substantial harm would not arise to any designated heritage assets. Therefore, the relevant requirements of the NMP are met and the consenting applications accord with policy GEN 6.

192. NPF4 refers to the concept of integrity of setting defined by HES as "changes to factors of setting that contribute to cultural significance such that understanding, appreciation and experience of an assets are not adequately retained will affect the integrity of setting".

193. Adverse effects to integrity of setting therefore relate to a fundamental shift in the relationship of an asset in its surroundings that would arise through loss or radical change to fundamental elements of that setting. While significant adverse effects are predicted to a number of Scheduled Monuments, in all cases the fundamental relationship between these assets and their surroundings, with historical, functional and cultural links to the sea, and the landscapes surrounding the Scheduled Monuments remain in essence unchanged. In addition, the perceptual prominence of the assets remains over the WDA infrastructure. While there would be, in some cases, a reduction in the perceived remoteness or expression of dominance, these characteristics would remain legible and understandable to a viewer and their ability to appreciate the contribution of those characteristics to the asset would remain. **Table 6.9** details this for each individual asset where significant adverse effects are predicted to occur.

194. As such, given that the thresholds in relation to substantial harm are not met, it is therefore also concluded that the integrity of setting would not be significantly affected.

Table 6.9 Rationale behind conclusions on the effect on integrity of setting

Asset	Significance of effect	Significant effect on Integrity of Setting	Rationale
SM287 Oronsay Priory and Cross	Moderate Adverse (significant)	No	Visibility of WTGs would affect the perceived remoteness of the asset and appear prominently in seaward views, but the abbey ruins would remain the principal focus in views in which the asset can be experienced and the relationship of the abbey to the modern farm and coastline would not be affected, leaving the asset in a regionally distinctive setting.
SM13213 Beinn a'Chaisteil,	Major Adverse (significant)	No	WTGs would be prominently visible as background elements in seaward views from a

Asset	Significance of effect	Significant effect on Integrity of Setting	Rationale
promontory fort and associated remains, Islay			variety of points within the monument. However, they would not be visible in the principal approach and would only be visible with the monument in more distant views where the asset and the landform on which it is located would remain the principal focus, and the perception of localised dominance of the asset would remain. Views landward would remain unaffected.
SM13214 Dun Bheolain, fort, Islay	Major Adverse (significant)	No	WTGs would be prominently visible as background elements in seaward views from a variety of points within the monument. However, they would not be visible in the principal approach and would only be visible with the monument in more distant views where the asset and the landform on which it is located would remain the principal focus, and the perception of localised dominance of the asset would remain. Views landward would remain unaffected.
SM12968 St Mary's Abbey, Iona, monastic settlement	Moderate Adverse (significant)	No	WTGs would be visible as distant elements of the background to some views from the asset with varying degrees of prominence. The asset would not be juxtaposed with the WTGs in views from the modern and supposed ancient pilgrimage route and WTGs would not appear in key views identified in the Iona Abbey Statement of Significance and Management Plan. The WTGs would appear juxtaposed with the Abbey church in some views from the north but in these views the church would remain the dominant visual element.

6.2.6 The Marine Human Environment

6.2.6.1 Shipping and Navigation, Military and Civil Aviation, Infrastructure and Other Marine Users

195. A summary of the outcomes of the assessment within **Chapter 13 Shipping and Navigation**, **Chapter 15 Military and Civil Aviation** and **Chapter 17 Infrastructure and Other Marine Users** of the EIAR are set out in **Table 6.10** to **Table 6.12** respectively.

Table 6.10 Summary of the outcomes of the Shipping and Navigation assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Vessel displacement and increased third-party vessel to vessel collision risk	M-19, M-25, M-26, M-28, M-31, M-35, M-36	Not significant	Not significant	N/A	GEN 21 TRANSPORT 1 TRANSPORT 2 TRANSPORT 3 TRANSPORT 6
Increased third-party vessel to project vessel collision risk	M-7, M-19, M-23, M-25, M-28, M-29, M-31, M-35, M-36,	Not significant	Not significant	N/A	
Reduced access to local ports and harbours	M-19, M-25, M-26	Not significant	Not significant	N/A	
Reduction of emergency response capability	M-7, M-26, M-29, M-31, M-36	Not significant	Not significant	N/A	
Vessel-to-structure allision risk	M-7, M-19, M-23, M-25, M-26, M-27, M-29, M-30, M-31, M-35, M-36	Not significant	Not significant	N/A	
Reduction of under keel clearance (Operation only)	M-7, M-8, M-19, M-25, M-26	Not significant	Not significant	N/A	
Anchor interaction with subsea cables (Operation only)	M-8, M-19, M-25, M-26,	Not significant	Not significant	N/A	

196. As shown in **Table 6.10**, effects associated with Shipping and Navigation were shown to not be significant with the implementation of the relevant embedded mitigation measures. This topic deals principally with risk and all risks were found to be either broadly acceptable or tolerable with mitigation and As Low As Reasonably Practicable (ALARP).

197. The development of the Project design has included a number of refinements which have had a positive impact upon Shipping and Navigation receptors, including increasing the distance from the WDA to Dubh Artach lighthouse to accommodate maintenance operations, refinements to the southern boundary to prevent isolated WTGs which could pose a safety risk, and refinements to the eastern boundary to reduce DFDS ferry route deviation, allow vessels to more safely navigate around shallow areas of seabed and accommodate a potential increase in fishing activity in this area. These Project design changes were consulted on with the relevant stakeholders who welcomed the amendments. The efficacy of these design changes is reflected in the lack of identified significant

impacts. Implementation of **Appendix 12 Outline Lighting and Marking Plan** and **Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan** of the EIAR will also ensure that adverse effects of the Project on Shipping and Navigation are minimised or avoided.

198. A summary of the effects on Military and Civil Aviation presented within **Chapter 15 Military and Civil Aviation** of the EIAR is shown in **Table 6.11**.

Table 6.11 Summary of the outcomes of the Military and Civil Aviation assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Creation of an aviation obstacle environment	M-20, M-26, M-27, M-33, M-34, M-35, and M-48.	Not significant	Not significant	No potential for cumulative effects	GEN 21 DEFENCE 1
Increased air traffic in the area related to Project activities (Operation only)	N/A	Not significant	Not significant	No potential for cumulative effects	
Impact on Civil Primary Surveillance Radar (PSR) Systems (Operation only)	N/A	Not significant	Not significant	Not significant	

199. As shown in **Table 6.11**, effects on Military and Civil Aviation were found to be not significant as a result of the Project, taking into account both embedded and additional mitigation. Implementation of **Appendix 12 Outline Lighting and Marking Plan** of the EIAR will also ensure that adverse effects of the Project on aviation receptors are minimised or avoided.

200. Before mitigation, major adverse (significant) effects were identified on Islay and Tiree Instrument Flight Procedures (IFPs) and on National Air Traffic Services (NATS) (En-Route) plc (NERL) PSR at Tiree as a result of the WDA infrastructure.

201. Prior to application submission, the Applicant consulted with Highlands and Islands Airports Limited (HIAL) regarding the impacts on IFPs. Suitable revisions to the IFPs will be made once final details of WTG locations and blade tip heights are available, should the Project receive consent. To revise IFPs, an airspace change proposal would be prepared in accordance with relevant guidance from the CAA (CAP 1616) and submitted for CAA approval. This additional mitigation would reduce effects to not significant.

202. For impacts on PSR, NATS has recently awarded Indra with a contract to upgrade the network of NERL operated en-route radars with new state-of-the-art systems. The PSRs at each of the ten existing NERL radar sites, including Tiree, will be replaced with an Indra PSR3D which give it the capability to mitigate the adverse effects of WTGs. NATS has confirmed that the “Indra solution” can be used as the radar mitigation for the Project, and that the mitigation is acceptable to military users of Tiree PSR (MoD 78 Squadron). The Applicant has engaged with NATS and has a draft Contract For Sale of Consultancy Services in Relation to Wind Turbines at Machairwind Offshore Windfarm

which is being negotiated, but both parties are in agreement on material terms. With the implementation of this additional mitigation, effects would not be significant.

203. A summary of the effects on Infrastructure and Other Marine Users presented within **Chapter 17 Infrastructure and Other Marine Users** of the EIAR is shown in **Table 6.12**.

Table 6.12 Summary of the outcomes of the Infrastructure and Other Marine Users assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Impacts on MoD maritime navigational interests	M-18, M-19, M-23, M-24, M-25, M-34, M-35, M-49	Not significant	Not significant	Not significant	GEN 4 RENEWABLES 1 REC & TOURISM 2 TRANSPORT 2 CABLES 1 DEFENCE 2
Impacts on recreational charter angling and wildlife tours	M-8, M-18, M-19. M-20, M-23, M-24, M-25, M-26, M-27, M-28, M-29, M-31, M-34, M-35, M-49	Not significant	Not significant	No potential for cumulative impacts	

204. As detailed in **Table 6.12**, effects on Infrastructure and Other Marine Users were found to be not significant with the implementation of embedded mitigation measures and the Project design refinements undertaken to date. Consultation with the MoD following issue of the WDA Scoping Report identified a potential interaction between the WDA and Highly Surveyed Routes used by the Navy; however, it should be noted that due to the location of these highly surveyed routes being of national security interest, the Project cannot be certain if the WDA presented in the consenting applications overlaps with these routes. Nevertheless, the WDA was refined to reduce the potential risk of interaction with Highly Surveyed Routes. In addition, the EIA Scoping WDA Boundary overlapped with three MoD Practice and Exercise Areas. Following refinements to the southern boundary of the WDA, the WDA no longer overlaps with one of these (X5539: Orsay).

6.2.6.2 Commercial Fisheries

205. A summary of the outcomes of the assessment within **Chapter 12 Commercial Fisheries** of the EIAR is set out in **Table 6.13**.

Table 6.13 Summary of the outcomes of the Commercial Fisheries assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Reduction in access to, or exclusion from the WDA	M-16, M-17, M-18, M-19, M-21, M-22, M-23, M-25, M-28, M-29, M-32 and M-36.	Not significant	Not significant	Not significant	GEN 4 GEN 21 FISHERIES 1 FISHERIES 2

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Displacement leading to gear conflict and/or increased fishing pressure	M-16, M-17, M-19, M-21, M-22, M-23, M-28, M-29 and M-32.	Not significant	Not significant	Not significant	FISHERIES 3 RENEWABLES 8
Displacement or disruption of commercial resources	M-4, M-5, M-6, M-7, M-8 and M-16.	Not significant	Not significant	Not significant	
Increased Project vessel traffic leading to interference	M-10, M-16, M-17, M-18, M-19, M-21, M-22, M-23, M-24, M-27, M-28, M-29, M-31, M-32 and M-36.	Not significant	Not significant	Not significant	
Gear snagging leading to loss of earnings	M-8, M-16, M-18, M-19, M-21, M-23, M-24, M-25, M-28, M-35 and M-36.	Not significant	Not significant	Not significant	

206. As shown in **Table 6.13**, effects on commercial fisheries were found to be not significant, following the implementation of embedded and additional mitigation measures. Refinements made to the northern WDA between EIA Scoping and application resulted in the avoidance of most of the areas of scallop grounds within the WDA which has contributed to a reduction in impact.

207. In the case of impacts related to reduction in access to, or exclusion from the WDA, and displacement for UK potting targeting crab and lobster, a significant effect was identified pre-mitigation, due to their limited capacity to relocate to alternative distant grounds, the potential for localised increases in competition and the high economic value of the resource (for further details see **Chapter 12 Commercial Fisheries** of the EIAR). Additional mitigation was therefore identified in the form of Disruption Agreements which will be implemented in advance of construction to coordinate and agree appropriate co-operation and establish evidence-based disruption payments to fishers. Implementation of **Appendix 10 Fisheries Mitigation, Monitoring and Communication Plan** of the EIAR will also ensure that adverse effects of the Project on Commercial Fisheries are minimised or avoided.

6.2.6.3 Planning Assessment Conclusions – Marine Human Environment

208. The policies of relevance to these assessments relate to co-existence with other activities in the marine area, consideration of cumulative effects, safeguarding of fishing activity, stakeholder engagement, consideration of effects on recreation and tourism, protection of navigational safety, retention of access to ports and harbours, safeguarding of ferry routes, avoidance of shipping displacement, and maintenance of effective defence systems. No significant effects were identified for Shipping and Navigation, Military and Civil Aviation, Infrastructure and Other Marine Users or

Commercial Fisheries, subject to implementation of embedded mitigation or identified additional mitigation. It is therefore demonstrated that the requirements of the NMP (policies GEN 4, GEN 21, RENEWABLES 1, RENEWABLES 8, REC & TOURISM 2, CABLES 1, FISHERIES 1, FISHERIES 2, FISHERIES 3, DEFENCE 1, DEFENCE 2, TRANSPORT 1, TRANSPORT 2, TRANSPORT 3 and TRANSPORT 6) and other relevant policy considerations are met.

6.2.7 Climate Context

6.2.7.1 Greenhouse Gas Assessment, Climate Change Resilience

209. A summary of the outcomes of the assessment within **Chapter 19 Greenhouse Gas Assessment** of the EIAR is set out in **Table 6.14**.

Table 6.14 Summary of the outcomes of the Greenhouse Gas assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
GHG emissions	M-51	**Significant beneficial** (Operation only) Not significant (Construction and Decommissioning)	Not significant	N/A	GEN 21
Disturbance to blue carbon habitats	N/A	Not significant	Not significant	N/A	
Blue carbon loss	N/A	Not significant	Not significant	N/A	

210. As shown in **Table 6.14**, the assessment of effects on GHGs showed that there would be a significant beneficial effect experienced during the operational phase, with all other effects being not significant. The significant beneficial effects would be experienced as a result of the avoidance of GHG emissions which would otherwise be produced without the Project using fossil fuels. The use of renewable energy to provide this electricity would result in the avoidance of 2,851,685 tonnes CO_2 equivalent (CO_2e) over the Project's lifetime.

211. The Applicant is committed to exploring GHG emission reduction opportunities throughout the Project's lifecycle. In refining the Project design pre-application, GBS for WTG foundations were removed from the project design envelope; these foundations require a substantial amount of concrete and therefore embodied carbon emissions are reduced. An Outline Carbon Management Plan (**Appendix 14 Outline Carbon Management Plan** of the EIAR) has been developed which presents the initial approach for managing and reducing GHG emissions associated with the Project and will inform the development of a detailed Carbon Management Plan prior to construction, should consent be granted.

212. Consideration of the vulnerability of the WDA infrastructure and its associated activities to the projected effects of climate change is set out in **Chapter 20 Climate Change Risk Assessment** of the EIAR. Unlike other chapters, this assessment does not aim to determine the significance of effects, but instead focuses on identifying potential climate-related risks, assessing their implications, and recommending appropriate measures to reduce these risks and enhance the overall resilience of the Project.

213. The impacts identified within the risk assessment were well understood climate stressors that are routinely encountered and managed within the offshore wind sector. The project design, construction methodology, operational controls and decommissioning strategy incorporate robust, industry-proven embedded mitigation (including measures M-15, M-27 and M-32) resulting in low residual risk. Consequently, no additional mitigation measures are required beyond standard practice.

6.2.7.2 Planning Assessment Conclusions for Climate Context

214. Policies of relevance to these assessments relate to minimisation of GHG emissions, adaptation to climate change and adherence to sustainable development principles.

215. As detailed above, significant beneficial effects were identified in relation to GHGs due to the Project's contribution to renewable energy generation. Other effects were not found to be significant, and risks associated with climate change were also found to be of acceptable levels subject to implementation of embedded mitigation. As such, it is demonstrated that the requirements of policy GEN 21 of the NMP and other relevant policy considerations are met.

6.2.8 Socio-economics

6.2.8.1 Socio-economics

216. A summary of the outcomes of the assessment within **Chapter 18 Socio-economics** of the EIAR is set out in **Table 6.15**.

Table 6.15 Summary of the outcomes of the Socio-economic assessment

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Increase in Employment and Gross Value Added (GVA)	N/A	**Significant beneficial** (construction only) Not significant (beneficial) (Operation and decommissioning)	**Significant beneficial** (see further detail below)	**Significant beneficial** (see further detail below)	GEN 21
Impacts on Communities	N/A	Not significant (construction) Significant beneficial (operation only)	No combined effect	**Significant beneficial** (see further detail below)	
Changes to Housing	N/A	Not significant (construction) Significant beneficial (operation only)	No combined effect	**Significant beneficial** (see further detail below)	
Changes to Labour Market	N/A	Not significant (construction) Significant beneficial (operation only)	No combined effect	**Significant beneficial** (see further detail below)	
Changes to Infrastructure and	N/A	Not significant	No combined effect	N/A	

Impact	Embedded Mitigation	Residual Effect	Combined Effect with the Offshore ECC and OnTDA	Cumulative Effect with Other Plans and Projects	Relevant NMP Policies
Other Local Services					
Impacts on Habitability	N/A	**Significant beneficial** (construction and operation)	No combined effect	**Significant beneficial** (see further detail below)	
Interconnecting Influence on Other Places	N/A	**Significant beneficial** (construction only) Not significant (operation)	No combined effect	N/A	
Socio-cultural effects	N/A	Not significant	No combined effect	N/A	
Tourism	N/A	Not significant	No combined effect	N/A	
Changes to Commercial Fisheries	N/A	Not significant	No combined effect	N/A	
Changes to Shipping and Marine Recreation	N/A	Not significant	No combined effect	N/A	
Impact on the Whisky Sector	N/A	Not significant	No combined effect	N/A	
Impact on Crofting	N/A	Not significant	No combined effect	N/A	

217. As shown in **Table 6.15**, a range of effects were identified from the socio-economic assessment, of which many were found to be significantly beneficial Whilst at this stage in the Project's development, specific decisions regarding port locations and their roles across its phases – construction (marshalling and assembly, marine operations), and O&M – have not yet been made and will not be confirmed until after consent is granted, indicative locations have been considered based on where activity is most likely to be concentrated, using available project information and sector knowledge. These locations are illustrative only and do not reflect any formal decisions about site or port selection; however, they have been selected to ensure that reasonable worst-case scenarios could be assessed. A summary of the assessed likely beneficial effects is as follows:

- Construction Phase:
  - A **major beneficial** economic impact at the marshalling and assembly port (Hunterston);
  - A **major beneficial** economic impact at the marine operations base (Oban);
  - A **moderate beneficial** economic impact on the Scottish economy;
  - A **major beneficial** effect on habitability at the marshalling assembly port (Kishorn);
  - A **major beneficial** effect on habitability at the marine operations base (Port Ellen); and
  - A **major beneficial** effect on the rest of Scotland (excluding construction ports) from interconnecting influences.

- O&M Phase:
  - A **major beneficial** economic impact at the O&M port (Campbeltown and Machrihanish);
  - A **moderate beneficial** economic impact in Scotland;
  - A **major beneficial** effect on communities at the O&M port (Campbeltown and Machrihanish);
  - A **major beneficial** effect on housing at the O&M port (Campbeltown and Machrihanish);
  - A **major beneficial** effect on the labour market at the O&M port (Campbeltown and Machrihanish); and
  - A **major beneficial** effect on habitability at the O&M port (Campbeltown and Machrihanish).

218. In addition, it is anticipated that the majority of cumulative effects will be beneficial as the marshalling and assembly port becomes a hub for offshore wind, resulting in long-term employment. As a result, the following significant beneficial cumulative effects have been identified:

- Construction Phase:
  - A **moderate beneficial** effect on the Scottish economy;
  - A **major beneficial** economic impact at the marshalling and assembly port (Kishorn);
  - A **major beneficial** effect on communities at the marshalling and assembly port (Kishorn);
  - A **major beneficial** effect on housing at the marshalling and assembly port (Kishorn);
  - A **major beneficial** effect on the labour market at the marshalling and assembly port (Kishorn); and
  - A **major beneficial** effect on habitability at the marshalling and assembly port (Kishorn).

219. All other effects were assessed as not significant.

220. Policies of relevance to this assessment relate to support for proposals only where they maximise net economic impact, including local and community socio-economic benefits. As detailed in **Section 3.5**, the **SEAP** sets out how the Applicant will develop, build and operate MachairWind in a manner that maximises social, economic and wider benefits for its host island communities, Argyll and Bute, the West of Scotland, and Scotland more broadly. The **SEAP** is structured around five interlinked outcomes that are focused on:

I. Maximising opportunities for Scottish businesses within the supply chain;
II. Enhancing local employment opportunities, particularly at ports;
III. Contributing to placemaking through infrastructure investment;
IV. Supporting regional economic development; and
V. Acting as a good neighbour to host communities.

221. The **SEAP** has a strong focus on maximising opportunities for Scottish businesses, with the aim of stimulating growth and increasing participation across all phases of the project lifecycle. Commitments include promoting supply chain opportunities at local and regional events, hosting supplier engagement events, maintaining a register of Argyll and Bute suppliers, undertaking a baseline survey of West of Scotland suppliers, and a requirement for Tier 1 contractors to identify and engage with suppliers in Argyll and Bute. This aligns with the Project's Supply Chain Development Statement, which will be updated in 2026 to reflect the **SEAP** actions.

222. The development of employment opportunities is central to the **SEAP**, with measures to address industry-wide skills shortages through the provision of accessible training, apprenticeships and graduate opportunities internally and in the wider supply chain. In addition, the **SEAP** includes actions to promote educational engagement, working in partnership with local and regional

educational institutions to raise awareness of offshore wind careers and inspire the next generation of the Scottish renewable energy workforce.

223. The **SEAP** includes commitments to support the delivery of placemaking within adopted Local Development Plans. MachairWind will also make up to £25 million available through an Offshore Wind Stimulus Fund to support the development of Scottish infrastructure, facilities and workforce commitments. The **SEAP** is designed to align with national policy objectives and local development plans, contributing to Scottish Government ambitions for a just transition and inclusive economic growth through renewable energy development.

224. The Applicant is committed to maximising the positive impacts of MachairWind and has made a series of commitments within the **SEAP** that focus specifically on supporting economic development in Argyll and Bute and the Highlands and Islands. These include commitments to align MachairWind logistics, infrastructure, and skills investment with regional investment priorities where possible, and collaborating with regional stakeholders to identify and develop opportunities that generate regional benefits.

225. The **SEAP** reaffirms the Applicant's commitment to regular community engagement through a Good Neighbour Feedback Loop. It highlights a buy local first policy which prioritises local spend where possible on services like catering, transport and accommodation. It also sets out commitments to ensuring a lasting host-community legacy through the establishment of CBFs for the Project's operational phase. To provide transparency and accountability of operations in host communities, SPR will report on project milestones that summarise socio-economic, supply chain, and environmental contributions.

226. Implementation of the **SEAP** would support national, regional and local economic goals with regards to development of the renewable energy industry.

6.2.8.2 Planning Assessment Conclusions for Socio-economics

227. Policy of relevance to this assessment relates to maximisation of net economic impact, including local and community socio-economic benefits.

228. As detailed above, the Project would result in significant beneficial socio-economic effects and the implementation of the **SEAP** submitted with the application would further provide significant enhancements to host island communities and support local, national and regional economic goals. As such, it is demonstrated that the requirements of policy GEN 21 of the NMP and other relevant policy considerations are met.

6.3 PLANNING ASSESSMENT SUMMARY

229. The Planning Assessment has demonstrated that effects on Marine Physical Environment, Benthic Ecology, Fish (including Basking Shark) and Shellfish, Marine Mammals and Leatherback Turtle, Offshore Ornithology, Shipping and Navigation, Military and Civil Aviation, Infrastructure and Other Marine Users, Commercial Fisheries and Climate Change Resilience would be not significant as a result of the Project.

230. Significant beneficial effects were identified on GHGs due to the provision of renewable energy, and on Socio-Economics due to increased expenditure in the economy and other associated effects.

231. Significant adverse effects were identified on SLVIA and Offshore Archaeology and Cultural Heritage, primarily due to the distance of the Project from island communities, designated landscapes and designated heritage assets. The Project's design refinement to date has reduced these effects insofar as possible, and the Project's Design Strategy (**Appendix 15 Design Strategy**

of the EIAR), developed in collaboration with NatureScot, provides a mechanism for ongoing design development, should consent be granted.

232. The Project includes a comprehensive suite of embedded mitigation measures, management and enhancement plans which will ensure that the Project minimises and, where possible, enhances its effects on the environment.

233. The assessment identified that the Project would be in accordance with policies GEN 4, GEN 6, GEN 7, GEN 8, GEN 9, GEN 10, GEN 13, GEN 21, RENEWABLES 1, RENEWABLES 8, REC & TOURISM 2, CABLES 1, FISHERIES 1, FISHERIES 2, FISHERIES 3, WILD FISH 1, DEFENCE 1, DEFENCE 2, TRANSPORT 1, TRANSPORT 2, TRANSPORT 3 and TRANSPORT 6 of the NMP.

234. For Offshore Archaeology and Cultural Heritage and SLVIA, despite the identification of significant effects, it was demonstrated that the requirements of policies GEN 6 and GEN 7 of the NMP are met.

235. Further discussion on the balance between the identified significant effects and the Project's social, environmental and economic benefits is set out in **Section 7.**

236. There are also a number of general policies within the NMP (GEN 1, GEN2, GEN 3, GEN 4 and GEN 18 (as set out in **Table 5.1**)) which it is demonstrated that the Project is in compliance with.

7 PLANNING BALANCE AND CONCLUSIONS

7.1 INTRODUCTION

237. This section sets out the key policy and legislative considerations of relevance to any WDA consent decision, followed by the balance between the environmental, social and economic outcomes for the Project and requirements of national policy, to reach a balanced judgement of whether consent should be granted.

7.2 POLICY AND LEGISLATIVE CONSIDERATIONS

7.2.1 Scottish Planning Policy and Legislation

238. Scotland has set some of the most ambitious climate-change goals in Europe. Under the Climate Change (Scotland) Act 2009, Scotland committed to long-term reductions in GHG emissions. This was amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 which set new targets for reducing GHG emissions in Scotland, to achieve the Scottish Government's ambition of net zero emissions by 2045. It has been demonstrated that the Project would contribute significantly to reductions in GHG emissions across its lifetime via the provision of renewable energy.

239. In January 2026, the Scottish Government finalised an updated offshore wind policy ambition to deploy 40 GW of new offshore wind between 2025 and 2040. The Project's capacity of up to 2 GW and characteristics as a fixed-bottom project, subject to less development and engineering risks and uncertainties than floating projects, will provide an important, meaningful and direct contribution to the achievement of ambition.

240. An overarching general planning principle of the NMP is in favour of sustainable development and use of the marine environment, especially within the renewable energy sector. The NMP positions renewable energy as central to meeting Scotland's decarbonisation targets while ensuring sustainable growth, subject to maximisation of economic benefits. NPF4 also provides strong support for infrastructure associated with offshore wind and recognises the positive economic potential. The Project's **SEAP** will deliver significant socio-economic enhancements locally, regionally and nationally. It has also been demonstrated that the Project would contribute towards Scotland's decarbonisation targets.

241. Furthermore, the Project's Objectives (reduction of GHG emissions, delivery of offshore wind, energy security, nature positive development, delivery of social and economic performance and optimising the use of the available site (see **Section 3**)) fully align with and contribute towards the successful implementation of national policy.

7.2.2 The Electricity Act 1989

242. Duties under Section 36 and Schedule 9 of the Electricity Act 1989 (see **Section 5.2.1**) are demonstrated to have been met through the extensive Project design refinements that have been undertaken since award of the original OAA, the comprehensive suite of embedded mitigation measures that are incorporated within the Project to minimise any adverse effects (**Appendix 5 WDA Mitigation and Commitments Register** of the EIAR), and the various management and enhancement plans (**Appendix 6 Outline Environmental Management Plan**, **Appendix 7 Marine Pollution Contingency Plan**, **Appendix 8 Invasive Non-Native Species Mitigation Plan**, **Appendix 9 Draft Marine Mammal Mitigation Protocol**, **Appendix 10 Fisheries Mitigation, Monitoring and Communication Plan**, **Appendix 11 Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries, Appendix 12 Outline Lighting and Marking Plan,**

Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan, Appendix 14 Carbon Management Plan and **Appendix 15 Design Strategy** of the EIAR and the **SEAP** and **NPP**) which will reduce effects on the natural and built environment and ensure the Project delivers long-term enhancements.

7.3 ENVIRONMENTAL, SOCIAL AND ECONOMIC OUTCOMES OF THE PROJECT

243. As set out in **Section 6**, the Applicant has endeavoured to avoid or reduce the Project's environmental effects through its design evolution and through commitment to comprehensive embedded mitigation. The effectiveness of these measures is demonstrated by the overwhelming majority of effects being not significant. As demonstrated in **Section 6**, the Project would be in accordance with the requirements of policies GEN 4, GEN 6, GEN 7, GEN 8, GEN 9, GEN 10, GEN 13, GEN 21, RENEWABLES 1, RENEWABLES 8, REC & TOURISM 2, CABLES 1, FISHERIES 1, FISHERIES 2, FISHERIES 3, WILD FISH 1, DEFENCE 1, DEFENCE 2, TRANSPORT 1, TRANSPORT 2, TRANSPORT 3 and TRANSPORT 6 of the NMP.

244. For Offshore Archaeology and Cultural Heritage, despite the identification of limited significant effects, it was demonstrated that the requirements of policies GEN 6 and GEN 7 of the NMP are met.

245. The assessment of effects on Commercial Fisheries confirmed that requirements of the policy which relate to co-existence are met (GEN 4 of the NMP), with no significant effects identified during the Project's operational phase. Importantly, the fixed-bottom nature of the Project enables some fishing activity to continue within the WDA during the Project's operation. Disruption payments would be provided as additional mitigation during construction for UK potting targeting crab and lobster, as localised exclusion zones would inhibit access to established grounds. Other fishing activities would not experience significant effects during construction due to reduced overlap with the WDA and greater availability of alternative grounds.

246. In respect of aviation safeguarding, proportionate mitigation is required to address impacts on IFPs and PSR. Prior to application submission, the Applicant consulted with HIAL regarding the impacts on IFPs and suitable revisions to the IFPs will be made once final details of WTG locations and blade tip heights are available, should the Project receive consent. For impacts on PSR, NATS has recently awarded Indra with a contract to upgrade the network of NERL operated en-route radars, including Tiree. NATS has confirmed that the "Indra solution" can be used as the radar mitigation for the Project, and that the mitigation is acceptable to military users. The Applicant has engaged with NATS and has a draft Contract For Sale of Consultancy Services in Relation to Wind Turbines at Machairwind Offshore Windfarm, which is being negotiated, but both parties are in agreement on material terms. With the implementation of these additional mitigation measures, residual effects on Military and Civil Aviation would not be significant.

247. Whilst consent is being sought for the WDA alone at this stage (this includes some transmission infrastructure), a whole project assessment has been undertaken by carrying out a combined assessment of the Project's other Development Areas (the Offshore ECC and OnTDA which will be subject to future consent applications) insofar as possible at this stage. This assessment considered impact interactions and additive effects to determine if any likely effects would be materially elevated from those assessed for the WDA alone assessment and was based on the level of detail available at the time of carrying out the assessment. Combined effects were also found to be not significant.

248. Significant adverse effects were identified in relation to SLVIA and Cultural Heritage, with the proximity of the WDA to island communities, national and local designations and designated heritage assets being the key driver for these effects. Consideration should therefore be given to the strategic marine planning context behind the WDA's location. The WDA was designated within the SMP-OWE

(2020) as POA W1, with acknowledgement that the site may give rise to adverse visual impacts and impacts on seascape and landscape character due to its distance from shore. The SMP-OWE stated that impacts may be reduced or avoided by project-level mitigation. The SEA undertaken for the Draft Updated SMP-OWE (2025) acknowledged that *'effects on the setting of a number of protected sites is likely'* and that *'residual effects on landscape/seascape is assessed as moderate adverse, depending on the spatial planning, array design and turbine design of development within the OA'.* Despite these expected significant effects, and following a process of constraints analysis, assessment and consultation, site W1 was retained by the Scottish Government as a viable option for offshore wind provision.

249. As detailed in **Section 2.2** and **Section 6.2.3.2**, the Applicant has undertaken significant refinements in the boundary of the WDA following award of the OAA, reducing the area by 40% between OAA award and consent application. In recognition of the limitations on making further design refinements at this stage, in advance of further survey work being undertaken, the Applicant has developed **Appendix 15 Design Strategy** of the EIAR in collaboration with NatureScot. This document includes a set of Design Objectives which will help to shape the final design of the Project in a way that seeks to protect the integrity and objectives of nationally important landscapes. This will be achieved by striving to reduce significant effects on the Jura NSA, while recognising that some seascape and visual change as a result of the Project is unavoidable. These Design Objectives will be balanced alongside the wider Project Objectives, including economic viability, flexibility in turbine placement, and other engineering and environmental constraints. Any improvements made to landscape and visual effects are likely to have associated advantages for designated heritage assets.

250. The Applicant is mindful of the need to secure appropriate spatial planning, array design and turbine design of the Project, in line with the expectations of both the existing and emerging SMPs, within any consent granted. To enable this, the consenting applications are accompanied by **Appendix 15 Design Strategy** and draft condition wording is set out in **Section 2.4.2** above. This demonstrates the Applicant's strong commitment to achieving good design outcomes and the intent to secure appropriate spatial planning, array design and turbine design.

251. The socio-economic assessment presented in the EIAR identified significant beneficial effects in relation to increases in employment and GVA, habitability and interconnecting influence on other places. All other effects were found to be not significant (either beneficial or adverse), including effects on tourism within the local area.

252. Significant beneficial effects were also identified in relation to GHGs. The benefits of supplying renewable energy to the UK's NETS would result in 2,851,685 tonnes CO_2e being avoided during the O&M phase of the Project due to the displacement of non-renewable electricity. The GHG intensity of the Project was also calculated to be 32.9 g CO_2e per kWh, which would contribute towards achieving the decarbonisation target of emissions intensity of 50 g CO_2e per kWh by 2030 as set out in the Electricity Generation Policy Statement (2013) and referenced as one of the key objectives for offshore wind in the NMP.

7.4 HABITATS REGULATIONS APPRAISAL AND WITHOUT PREJUDICE DEROGATION CASE

253. The Applicant's RIAA concluded that no AEoSI would occur as a result of the Project, either alone or in-combination on any designated site. It is possible that the Scottish Ministers may not reach the same conclusion. In this event, a derogation would be required and compensation may be deemed necessary for the guillemot feature of the North Colonsay and Western Cliffs SPA which has been identified for potential compensation planning on a 'without prejudice' basis. The **Without Prejudice Derogation Case** and associated **Appendix 1 Without Prejudice Guillemot Compensation Plan**

has been demonstrated that there are IROPI for developing the Project, there are no alternative solutions and that suitable and sufficient compensation measures can be deployed to satisfy the requisite statutory tests.

7.5 OVERALL PLANNING BALANCE

254. Given the significant legislative and policy drivers behind renewable energy and decarbonisation, and to support the Scottish Government's 2040 offshore wind ambition and 2045 target to achieve net zero, the need for the Project should be given very considerable weight in the planning balance.

255. Whilst a limited number of significant adverse effects were identified with regard to Cultural Heritage, the specific policy requirements of the NMP were demonstrated to be met (see **Section 6.2.5.1**).

256. With regard to the identified significant adverse effects on SLVIA interests, consideration must first be given to the principle of offshore wind development at the proposed scale within POA W1 being firmly established and the policy context behind the site's allocation. This includes the acknowledged significant effects set out in the SMP-OWE which were expected to arise as a result of the expected scale of development in this area, as well as the substantial refinements which have been made to the WDA prior to the submission of the consenting applications. Significant adverse effects were identified as a result of the Project on some discrete SLQs of the Jura NSA. Whilst the Project's Design Strategy (**Appendix 15 Design Strategy** of the EIAR) includes a series of design objectives which would seek to minimise effects within the Jura NSA, Policy GEN 7 and paragraph 4.28 of the NMP state that where NSAs are affected, if it cannot be demonstrated that the integrity of the area or its special qualities would not be adversely affected, that any such effects must be clearly outweighed by social, environmental or economic benefits of national importance. Similarly, Policy 4 of NPF4 also states that support will be given for proposals affecting NSAs only where any significant adverse effects on special qualities are clearly outweighed by social, environmental or economic benefits of national importance. The planning assessment has demonstrated that there would be no adverse effects on integrity within the Jura NSA, and therefore the requirements of policy GEN 7 are met.

257. As detailed in **Section 3.5**, the Project's **SEAP** will deliver a range of benefits and enhancements structured around five interlinked outcomes that represent the economic and social value the WDA seeks to deliver at national, regional and community levels. These outcomes are focused on:

- Maximising opportunities for Scottish businesses within the supply chain;
- Enhancing local employment opportunities, particularly at ports;
- Contributing to placemaking through infrastructure investment;
- Supporting regional economic development; and
- Acting as a good neighbour to host communities.

258. Delivery of the **SEAP** will ensure that significant beneficial effects are experienced locally, regionally and nationally. It is clear that the socio-economic benefits and enhancements that would be delivered by the Project are of the national scale that would satisfy the requirements of GEN 7 and paragraph 4.28 of the NMP and Policy 4 of NPF 4.

259. Furthermore, the contribution that the Project would make towards meeting Scotland's ambitious net zero and decarbonisation targets, and the scale of reduction in GHG emissions across the Project's lifetime, are of significant environmental, social and national importance. The Project is one of the few applications for sites allocated within the SMP based on fixed-bottom foundation technology, making it subject to fewer developmental and engineering risks and uncertainties than floating projects, and would provide a reliable 2 GW renewable energy source.

260. In addition, the Project's **NPP** sets out a range of potential enhancement options that may be considered within future design evolution which would support the biodiversity enhancement goals set out within the Scottish Biodiversity Strategy to 2045, the NMP and NPF4 and deliver further environmental benefits.

261. Given the significant environmental, social and economic benefits and enhancements that would be delivered by the Project set out above, it is demonstrated that the Project is compliant with all relevant policy. This, coupled with the status of the Project as a National Development and the strong policy support afforded renewable energy projects, should result in there being no barrier to consent both under Section 36 of the Electricity Act 1989 and Marine Scotland Act 2010 in the case of marine licences. The Project is therefore considered to be acceptable in planning terms.

7.6 CONCLUSIONS

262. This Planning Statement demonstrates the national and specific locational need for the Project and that the Project accords with all relevant national and regional policies and would be in alignment with Scottish climate change, net zero and decarbonisation targets. It has also demonstrated that duties under Schedule 9 of the Electricity Act 1989 are met, and that the Project would deliver nationally-important social, economic and environmental benefits. These nationally-important benefits outweigh the predicted effects of the Project, including those on nationally-important receptors. National policy asserts a presumption in favour of sustainable development for renewables projects within allocated areas, and the Project would provide infrastructure of national significance. Accordingly, a decision of the Scottish Ministers to grant consent under Section 36 of the Electricity Act 1989 for the Project, alongside approval of the requested marine licences, would be fully compliant with and is supported by the relevant national policy framework.

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