MachairWind Offshore Windfarm

Appendix 3 WDA Scoping Validation Report

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Glossary of Acronyms

Term	Definition
ECC	Export Cable Corridor
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
GBS	Gravity based structures
GW	Gigawatts
HAT	Highest astronomical tide
HES	Historic Environment Scotland
HIAL	Highlands and Islands Airport Ltd
IAC	Inter-array cable
ICES	International Council for the Exploration of the Seas
INTOG	Innovation and Targeted Oil & Gas
km	Kilometres
LAT	Lowest Astronomical Tide
MCA	Maritime Coastguard Agency
MD-LOT	Marine Directorate Licencing and Operations Team
MD-SEDD	Marine Directorate Science Evidence, Data and Digital
MoD	Ministry of Defence
NLB	Northern Lighthouse Board
OAA	Option Agreement Area
OnTDA	Onshore Transmission Development Area
OSP	Offshore Substation Platform
PDE	Project Design Envelope
SEA	Strategic Environmental Assessment
SFF	Scottish Fishermen's Federation
SMP-OWE	Sectoral Marine Plan for Offshore Wind Energy
UK	United Kingdom
UXO	Unexploded Ordnance
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.
Collision	The act or process of two moving objects colliding.
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.
Cumulative Effects Assessment	Assessment of likely significant effects resulting from the incremental change caused by other past, present and reasonably foreseeable projects / activities together with the Project. This is separate to combined effects arising between the Project's separate Development Areas.
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.
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.
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".
Habitats Regulations	A collective term used to describe the Conservation of Habitats and Species Regulations 2017 and The Conservation (Natural Habitats, &c.) Regulations 1994.
Highest astronomical tide (HAT)	The highest level that can be expected to occur under average meteorological conditions and under any combination of astronomical conditions.
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).
International Council for the Exploration of the Seas (ICES) statistical rectangles	The International Council for the Exploration of the Seas (ICES) standardise the division of sea areas to enable statistical analysis of data. Each ICES statistical rectangle is 30 min latitude by 1 degree longitude in size (approximately 30 x 30 nautical miles). A number of rectangles are amalgamated to create ICES statistical areas.

Term	Definition
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.
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 cables	The collective term for all offshore cables i.e. IACs, offshore substation platform link cables, offshore export cables and associated fibre optic cables.
Offshore ECC infrastructure	The offshore transmission infrastructure located within the boundary of the Offshore Export Cable Corridor, namely the offshore export cable(s).
Offshore export cable	Armoured cable containing electrical cores between the offshore substation platform(s) and landfall. Offshore export cables will include bundled fibre optic cables. The offshore export cables are subject to Marine Licence applications under the Marine (Scotland) Act 2010. The portion of the offshore export cable(s) located within the WDA is assessed as part of this MachairWind WDA EIA and a marine licence application to construct, alter or improve this portion has been submitted alongside the WDA application. A separate marine licence application will be submitted for the portion of the offshore export cable(s) from the WDA boundary to mean high water Mean High Water Springs.
Offshore Export Cable Corridor (ECC)	The preliminary boundary extending from the WDA to mean high water springs near Girvan, South Ayrshire and within which the offshore export cable(s) will be located. A separate marine licence application will be submitted for the offshore export cable(s) located within the Offshore ECC.
Offshore Substation Platform (OSP)	An offshore platform with a fixed foundation located within the WDA which houses electrical equipment such as transformers, switchgear, protection and control systems, and enables the windfarm's renewable electricity to be collected via inter-array cables and exported to the National Electricity Transmission System via offshore export cables.
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.

Term	Definition
Onshore Transmission Development Area (OnTDA)	The preliminary boundary which extends landward from mean low water springs and includes the land required for the landfall of the offshore export cables and their route up to but not including the proposed high voltage direct current switching station which will be developed and constructed by Transmission Owner, ScottishPower Transmission. This Transmission Owner is responsible for consenting the high voltage direct current switching station. Onward connections to the National Electricity Transmission System will be consented by National Grid Electricity Transmission and ScottishPower Transmission. Where relevant, these are considered as part of cumulative effects assessment in the EIA.
OnTDA infrastructure	The onshore transmission infrastructure, for which the Applicant is responsible, that is located primarily within the OnTDA, up to mean low water springs, and includes but is not limited to: landfall(s), onshore export cables, transition joint bays, telecom/SCADA infrastructure including vehicular access, joint bays, link boxes and temporary construction compounds. The OnTDA infrastructure will be subject to a planning application under the Town and Country Planning (Scotland) Act 1997.
Option Agreement Area (OAA)	The seabed area awarded to ScottishPower Renewables in January 2022 through the Scotwind leasing round.
OSPAR	OSPAR started in 1972 with the Oslo Convention against dumping and was broadened to cover land-based sources of marine pollution and the offshore industry by the Paris Convention of 1974. These two conventions were unified, updated and extended by the 1992 OSPAR Convention. OSPAR is so named because of the original Oslo and Paris Conventions ("OS" for Oslo and "PAR" for Paris).
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.
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.
ScotWind	A Crown Estate Scotland seabed leasing round which enabled developers to propose offshore wind projects and apply for seabed rights to plan and build windfarms in Scottish waters.
Scour protection	Protective measures to avoid sediment being eroded away from the base of the wind turbine generator foundations as a result of the flow of water.
The Applicant	The legal entity submitting consent applications for the MachairWind Offshore Windfarm, namely Machairwind Limited.
The Project	MachairWind Offshore Windfarm including all its Development Areas and associated infrastructure.
Transition bay	Connects offshore and onshore export cables at the landfall. The transition bay will be located above mean high water.
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).
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.

1 WDA SCOPING VALIDATION REPORT

1.1 INTRODUCTION

1.1.1 Background

1. The MachairWind Offshore Windfarm ('the Project') is being developed by Machairwind Limited ('the Applicant') with separate applications being submitted for each of its three Development Areas i.e. the Windfarm Development Area (WDA), the Offshore Export Cable Corridor (ECC) and Onshore Transmission Development Area (OnTDA). The WDA is 448 km^2 and is located off the west coast of Scotland, to the northwest of Islay and west of Colonsay. The WDA infrastructure includes but is not limited to:

   - Wind Turbine Generators (WTG) and associated fixed foundations and scour protection;
   - Offshore Substation Platforms (OSP) and associated fixed foundations and scour protection;
   - Inter-array cables (IACs) and associated cable 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.

2. When operational, the WDA is anticipated to have a capacity of around 2 Gigawatts (GW) generated by up to 144 WTGs. This will have the potential to generate renewable electricity for up to two million United Kingdom (UK) homes, contributing to Scotland and the UK's transition to Net Zero and the UK's energy security in line with Government policy.

3. The earliest that WDA construction could commence is anticipated to be 2030.

4. The Applicant is seeking the following consents from Scottish Ministers for the WDA:

   - Section 36 consent under the Electricity Act 1989; and
   - Two Marine Licences under the Marine (Scotland) Act 2010.

5. Further details on the consenting approach including the location of each Development Area, the key respective infrastructure and the associated consents and licences that are being sought as part of each Development Area application are provided in **Chapter 1 Introduction** of the Environmental Impact Assessment (EIA) Report (EIAR).

6. The consenting process is summarised in **Table 1.1**.

Table 1.1 Overview of the process for offshore windfarm developments in Scotland

Development Stage	Active Undertaken
Pre-application	Initial project design envelope, scoping, EIA and consultation on the proposed project.
Application	Submission of application to MD-LOT, engagement with consultees and public advertisement of the application.
Consideration of Application	Consultees submit representations on the application.
Application of Evaluation	Responses submitted by consultees and the application are reviewed by MD-LOT and recommendation provided to the Scottish Ministers.
Application Determination and Announcement	Scottish Ministers provide the determination on the application, which is then publicly announced and published

Development Stage	Active Undertaken
Post-consent	Developer compliance with conditions associated with consent under Section 36 of the Electricity Act 1989 (as amended) (UK Parliament, 198921) and relevant Marine Licence(s).

1.1.2 Document Purpose

7. This document serves as the WDA Scoping Validation Report for the Project, the need for which was identified within the Scoping Opinion received from Marine Directorate Licensing and Operations Team (MD-LOT) in January 2025, where it stated:

8. *'In the event that the Developer does not submit applications for a s.36 consent under the 1989 Act and marine licence under the 2010 Act for the Proposed Development within 12 months of the date of this Scoping Opinion, the Scottish Ministers strongly recommend that the Developer seeks further advice from them regarding the validity of the Scoping Opinion'.*

9. This WDA Scoping Validation Report has therefore been prepared in response to this recommendation within the Scoping Opinion.

10. The purpose of this WDA Scoping Validation Report is to confirm and if required, update or refine the scope of the WDA EIAR to reflect that the Scoping Opinion was issued over 12 months prior to consent application submission.

11. In addition, this Scoping Validation Report will also validate consultation received from the Scoping Opinion, ensuring that all potential likely significant effects identified in the EIAR have been comprehensively identified and addressed.

1.1.3 Scope

12. This WDA Scoping Validation Report will cover all WDA infrastructure described in **Section 1.1.1**. Topics have been scoped into the EIA where topic receptors are identified as likely to have significant effect on the physical, biological and human environment.

13. An overview of the assessment methodologies used to characterise the existing environment (including the future baseline) associated with the Project, enabling a suitable assessment of likely significant effects are described in EIAR **Chapter 5 EIA Methodology** and in individual receptor-topic chapters in the EIAR.

14. In line with the WDA Scoping Report, the WDA EIAR presents a combined assessment of the construction, operation and maintenance and decommissioning of the WDA activities with the Offshore ECC and OnTDA activities (commensurate with the level of detail that is available at the time of carrying out that assessment). This approach ensures a holistic view is undertaken of the entire Project. As noted in **Chapter 1 Introduction** of the **WDA Scoping Report**, the assessment of likely significant effects on all receptors associated with the Offshore ECC and OnTDA will be presented in individual Scoping Reports, which will be submitted separately in accordance with the relevant EIA Regulations. Within the upcoming Offshore ECC and OnTDA consenting strategies, their respective scoping and Environmental Report / EIARs will include the assessment outcomes of the WDA EIAR.

1.1.4 Document Structure

15. The WDA Scoping Validation Report is structured as follows:

- Section 1: Introduction – Provides a brief background to the Project and describes the purpose and scope of the document;

- Section 2: Updates to the Project – Provides an overview of the developments and milestones following the submission of the WDA Scoping Report. Highlights changes / refinements to the Project design between the EIAR and Scoping Report, including boundary and infrastructure updates. The section also presents any relevant legislation, policy or guidance additions or changes since the submission of the WDA Scoping Report; and
- Section 3: Summary – Provides a conclusion on the validity of the Scoping Opinion provided in January 2025 in relation to that which has been assessed in the WDA EIA.

2 UPDATES TO THE PROJECT

2.1 LEGISLATION, POLICY AND GUIDANCE

16. The legislation, policy and guidance used to inform the WDA Scoping Report remains valid at the time of writing the EIAR (March 2026) although a number of updates are noted below.

17. Recent updates to relevant legislation include the Climate Change (Scotland) Act 2009 as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024. In November 2024, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 was introduced, and replaced the targets set out in 2009 with a framework of targets based on carbon budgets. However, the overall target of net zero by 2045 remains in place.

18. The former Planning and Infrastructure Bill received Royal Assent on 18 December 2025, becoming the Planning and Infrastructure Act 2025, with the aim of modernising and accelerating approvals for nationally significant infrastructure, including clean energy and grid connections. The Act introduced measures to streamline consenting, prioritise electricity grid connections, and improve land assembly (including compulsory purchase mechanisms) to speed delivery of homes, transport and energy projects. For Scotland, the Act delivers procedural reforms to Electricity Act consenting. Most of these changes commence two months after Royal Assent, while full operation depends on accompanying regulations to be made by Scottish Ministers; Legislative Consent Memorandums were agreed by the Scottish Parliament in October 2025 to enable application in Scotland.

19. Updates in policy include the release of the Draft Updated Sectoral Marine Plan for Offshore Wind Energy (SMP-OWE) (Scottish Government, 2025a). The policy is currently undergoing an Iterative Plan Review to incorporate the outcomes of the ScotWind, Innovation and Targeted Oil & Gas (INTOG), and Test & Demonstration leasing rounds. Consultation feedback, including a response from the Applicant, is being reviewed. The Draft Updated SMP-OWE introduces refined Option Areas within the spatial limits of existing Plan Options and Areas of Search and sets out key development parameters intended to guide licensing, consenting, and continued project progression in line with the National Marine Plan.

20. The Draft Updated Offshore Wind Ambition was released in 2025, launching a consultation on a draft updated SMP-OWE and proposing an increase in offshore wind targets. This was subsequently finalised in 2026, with the Scottish Government increasing the targeted offshore wind capacity in Scottish waters to 40GW by 2040 (Scottish Government, 2026).

21. The Revised Carbon Budget Delivery Plan (DESNZ, 2025), sets out how the UK intends to meet Carbon Budgets 4 to 6 (2023-2037) and stay on track for the 2050 Net Zero target. The Plan outlines the emissions-reduction trajectory required under the Climate Change Act and integrates domestic carbon budgets with the UK's international climate commitments, including 2030 and 2035 NDCs under the Paris Agreement. It reflects a strengthened policy framework following earlier versions ruled unlawful by the High Court. It presents cross-sector projections and policy measures for decarbonising power, transport, buildings, industry, natural resources, and greenhouse gas

removals, and concludes that current policies are sufficient to meet the Sixth Carbon Budget (2033-2037) and 96-99% of international commitments.

22. As identified in the Scoping Report, in 2022, the ESO (now NESO) recommended a new electricity network design called the Pathway to 2030 HND. In November 2025, NESO published a draft HND Implementation Plan along with a related suite of environmental assessments for public consultation. These environmental assessments ensured their recommended offshore network designs (including MachairWind) adequately address environmental concerns at a strategic level and included a Strategic Environmental Assessment (SEA), Habitats Regulations Appraisal, and Marine Conservation Zone Assessment. Whilst the SEA considers a connection point in Ballantrae, the majority of the offshore ECC has been strategically appraised. It should be noted that the Applicant has submitted a response to the consultation.

23. These described amendments to the legislation and policy used to inform the WDA EIA do not change or invalidate the existing Scoping Opinion. Further details on the current legislation, policy and guidance applicable to the Project can be found in **Chapter 2 Policy and Legislation** of the EIAR. Additionally, each receptor-topic chapter details legislation and policy relevant to each assessment and should be referred to for those details.

2.2 PROJECT DEVELOPMENTS

24. Since submission of the WDA Scoping Report to MD-LOT in October 2024, the Applicant has undertaken further baseline characterisation surveys, undertaken engineering and environmental constraints workshops and facilitated stakeholder and public consultation events which has informed the refinement of the Project Design Envelope (PDE). Feedback from the Scoping Opinion has also been considered. The following sections outline the key project developments that have been made since submission of the WDA Scoping Report.

2.2.1 WDA Boundary Refinements

25. Changes to the WDA boundary have been made since submission of the WDA Scoping Report. A detailed account of how the WDA boundary has changed is provided in **Chapter 4 Site Selection and Alternatives** of the EIAR.

26. In summary, following hazard workshops held with Shipping and Navigation / Commercial Fisheries stakeholders, a meeting was held with the Northern Lighthouse Board (NLB). During this meeting, the Applicant discussed the potential impacts on Dubh Artach lighthouse, the statutory public consultation events and ongoing stakeholder engagement that has taken place throughout the pre-application period, noting how the Applicant has refined the WDA boundary presented at scoping.

27. Consultation with the Ministry of Defence (MoD) following issue of the Scoping Report identified a potential interaction between the WDA and Highly Surveyed Routes used by the Navy. As such, the WDA was refined to reduce the potential risk of interaction with Highly Surveyed Routes.

28. Following feedback received at the initial round of Statutory Consultation regarding potential visual impacts of the Project, the southern and eastern WDA boundary was refined which has resulted in a slight reduction in impact on host communities, cultural heritage assets and nearby National Scenic Areas.

29. Further examination of the geophysical survey collected for the Project identified areas within the WDA that would not be suitable for the installation of WTG / OSP foundations. This included a deep-water trench that is located within the middle of the WDA and additional areas of seabed in water depths greater than 60 m. In addition, areas of shallow bedrock within the eastern section of the WDA were also identified. These areas cumulatively add up to an area of approximately 51 km² and are collectively referred to as the ‘WDA Restricted Build Area’.

30. The refinement to the WDA boundary resulted in a reduction in area from 510 km² to 448 km², representing a reduction in of just over 12%[1]. As the WDA boundary has reduced from that presented at scoping, the Scoping Opinion is deemed to remain valid.

2.2.2 WDA Infrastructure

31. The WDA Scoping Report proposed between 88 (340 m blade tip height) and 147 (260 m blade tip height) WTGs. Following the trend of rapid growth of WTG sizes and power ratings in the last 20 years, it is expected that WTGs available in the years 2025-2035 will be in the range of 15 - 24 MW. By the time construction starts, the models currently on the market will most likely have been superseded by newer technology. This assumption has been confirmed by the Applicant's experience in the offshore wind sector to date, and the suppliers with whom the Applicant has engaged during the Project's early development stage.

32. Therefore, based on the WTGs likely to be available at the time the Project enters construction, a PDE for the application has been established which includes between 91 of the largest (335 m blade tip height) and 144 of the smallest (280 m blade tip height) WTGs.

33. All WTGs will have bottom-fixed foundations. The following WTG foundation design options are included within the consent application:

- Pin pile jacket;
- Suction bucket jacket; and
- Monopile.

34. It is possible that more than one type of WTG foundation could be used across the WDA.

35. At the point of scoping, the Applicant had retained several WTG foundation options to retain flexibility in the PDE. In their Scoping Opinion, the Scottish Fishermen's Federation noted their primary concern was regarding the spatial footprint of the WTG foundations in the WDA. Upon review of the potential foundation options, it was identified that Gravity Based Structures (GBS) would have the greatest spatial footprint of any of the potential foundation options on the seabed within the WDA. Moreover, concrete production is carbon intensive and so production of up to 144 GBS foundations would significantly increase the embedded emissions were GBS to be taken forward. Therefore, removal of GBS as a foundation option for WTGs has reduced the worst-case seabed footprint and embedded emissions for WTGs thus lowering the likelihood of significant effects within the impact assessments.

36. The approximate length of IACs proposed at scoping was 450 km. Following further design consideration based on the indicative WTG / OSP layouts that have been assessed as part of the EIA, the IAC length has increased to a maximum of 572 km.

37. Regarding cable burial depths, whilst the minimum target burial depth has reduced from 0.5 m to 0.3 m this would only be for IAC cables along short and discrete sections of their length. A detailed justification for cable burial depths is provided in **Chapter 3 Project Description** of the EIAR.

38. Whilst the IAC length and target cable burial depths have increased and decreased respectively since scoping, there are no new impacts as a result of this and therefore the Scoping Opinion remains valid.

[1] It should be noted that the WDA Restricted Build Area is located within refined 448 km² WDA boundary.

2.2.3 Addition of WDA Transmission Infrastructure

39. The WDA Scoping Report did not describe transmission infrastructure that would be located within the WDA. The transmission infrastructure that will be located within the WDA (OSPs, OSP link cables and a portion of the offshore export cable), has been assessed within the WDA-alone assessment as part of the WDA EIA. This ensures that all infrastructure within the boundary of the WDA (i.e. the WDA infrastructure), for which marine licences to construct, alter or improve are being sought as part of the WDA consent application and has been adequately assessed (see **Chapter 1 Introduction** and **Chapter 3 Project Description** of the EIAR for further details).

40. There could be up to two OSPs located within the WDA. The foundation types that may be used for the OSPs are:

- Pin pile jackets;
- Suction bucket jackets; and
- GBS.

41. A maximum of four OSP link cables have been included within the WDA PDE, with a total length of 272 km and up to two cables bundled within the same trench.

42. Additionally, up to 200 km of offshore export cable with up to two cables bundled within the same trench, within the WDA has been assessed as part of the WDA-alone assessment in the technical chapters of the EIAR.

43. The Applicant held a meeting with MD-LOT and NatureScot on 10 June 2025 to discuss the consenting strategy for the WDA. The Applicant set out that there would be no new or materially different impacts as a result of this inclusion and therefore the Scoping Opinion would remain valid. MD-LOT and NatureScot did not raise any concerns regarding this.

2.2.4 PDE Updates

44. Comments raised by Scottish Ministers in the Scoping Opinion acknowledged the Applicant's intention to apply a design envelope approach to enable flexibility within the consent process. Scottish Ministers emphasised that:

45. "*the Developer must make every attempt to reduce to narrow the range of options. Where flexibility in the design envelope is required, this must be defined within the EIA Report and the reasons for requiring such flexibility clearly stated. At the time of application, the parameters of the Proposed Development should not be so wide-ranging as to represent effectively different projects. To address any uncertainty, the EIA Report must consider the potential impacts associated with each of the different scenarios. The criteria for selecting the worst case and the most likely scenario, together with the potential impacts arising from these, must also be described. The parameters of the Proposed Development must be clearly and consistently defined in the application for the s.36 consent and marine licences and the accompanying EIA Report*."

46. The WDA PDE is detailed in **Chapter 3 Project Description** of the EIAR. The Chapter outlines that the Project has adopted the Rochdale Envelope approach in accordance with current good practice, as described in Marine Scotland Consenting and Licensing Guidance for Offshore Wind, Wave and Tidal Energy Applications (2018) and related guidance outlined by Marine Scotland[2] and the Energy Consents Unit (Marine Scotland, 2022). The main requirements of the Marine Scotland (2022) guidance are to develop an "informed and credible" design envelope and to justify the parameters selected in relation to likely environmental effects.

[2] Now referred to as the Marine Directorate

47. **Table 2.1** summarises the updates made to the key WDA infrastructure parameters between the Scoping Report and the EIAR. **Chapter 3 Project Description** of the EIAR should be read for full context, including justification for project design revisions.

Table 2.1 Outline description of WDA infrastructure at Scoping compared to EIAR

Design Parameter	WDA Design Envelope	
	Scoping	**EIAR**
WTG foundation type (bottom fixed)	Monopiles; Pin pile jacket; Suction bucket jacket; and GBS.	Monopiles; Pin pile jacket; and Suction bucket jacket.
WTG range	88-147	91-144
Maximum number of OSPs	Not included	2
Maximum number of OSP link cables	Not included	4
Maximum length of total OSP link cables (km)	Not included	272
Maximum length of IACs (km)	~450	572
Maximum number of offshore export cable(s)	Not included	4
Maximum length of total offshore export cable(s) located wholly within the WDA boundary (km)	Not included	200
Minimum target IAC burial depth (m)	0.5	0.3
Minimum target OSP link and offshore export cable burial depth (m)	Not included	1.0
Minimum blade tip height (air gap) (m HAT)	22.45	28.4
Maximum blade tip height (m LAT)	340	335

2.2.5 Site Surveys

48. Baseline characterisation surveys within the WDA have been completed during 2025 to provide a detailed understanding of the existing environment, key features of the seabed and marine environment. Survey campaigns include:

- Metocean surveys; and
- Geophysical surveys.

49. Further examination of the geophysical survey collected for the Project identified areas within the WDA that would not be suitable for the installation of WTG / OSP foundations. This included a deep-water trench that is located within the middle of the WDA and additional areas of seabed in water depths greater than 60 m. In addition, areas of shallow bedrock within the eastern section of the WDA were also identified. These areas cumulatively add up to an area of approximately 51 km² and are collectively referred to as the 'WDA Restricted Build Area'.

2.2.6 Community and Stakeholder Consultation

50. An extensive programme of community and stakeholder consultation has been undertaken to inform the EIA process, including but not limited to statutory and non-statutory public consultation and Expert Topic Groups. Regular engagement with stakeholders has shaped the WDA refinement

process, including design. In advance of the formal application, extensive consultation has been carried out to allow stakeholders and local communities the opportunity to provide feedback on all aspects of the Project, such as informing the scope of studies, surveys, assessments and design. **Chapter 6 Consultation and Stakeholder Engagement** of the EIAR and the **Pre-Application Consultation Report** details the extensive stakeholder and public consultation during the pre-application stage of the Project, which has informed the EIA and project decision making.

3 POTENTIAL IMPLICATIONS FOR EIA RECEPTORS

51. A review of the Scoping Opinion has been undertaken for each EIA topic in relation to changes set out above. This exercise has been undertaken to assess if there is potential for change in likely significant effects and whether these alter those presented in the WDA Scoping Report as being scoped in or scoped out.

52. Several of the design refinements detailed in **Section 2.2** are of relevance to all topic chapters with regards to the ongoing validity of the Scoping Report, and are listed below:

- The location of the WDA has not changed, although the footprint has reduced from within the 510 km² scoping development area to 448 km²;
- The range of WTGs has changed from between 88 and 147 to 91 and 144 however this does not invalidate the Scoping Opinion as there would be no new or materially different impacts;
- The length of IAC cables has increased from approximately 450 km to 572 km however this does not invalidate the Scoping Opinion as there are no new or materially different impact pathways as a result of this change; and
- There are no new or materially different impact pathways from the inclusion of up to two OSPs, OSP link cables and the portion of the offshore export cable located within the WDA.

53. In addition to the above, **Table 3.1** presents topic-specific responses regarding the ongoing validity of the Scoping Opinion.

Table 3.1 Potential implications for EIA receptors

Receptor	Summary of Relevant Points from Scoping Opinion	Justification of Validity of Scoping Opinion
Marine Physical Environment	Study Area The Scottish Ministers are broadly content with the proposed Study Area described in Section 6.6 (of the Scoping Report), however, highlight the NatureScot representation regarding the definition of 'short distance' and request that this must be fully addressed and implemented in the EIAR. Scope The Scottish Ministers broadly agree with the impacts proposed to be scoped in. However, in line with advice from Marine Directorate Science Evidence, Data and Digital (MD-SEDD) and representation from NatureScot, advise that impacts on mixing and stratification is also scoped in due to consistent seasonal stratification.	The WDA boundary has reduced since scoping and a refined (smaller) zone of influence based on the potential maximum effect on waves has been defined with distances given for all directions. Potential impacts on mixing and stratification have been assessed as requested. Therefore, the Scoping Opinion remains valid.
Benthic Ecology	Baseline Data The Scottish Ministers are broadly content with the Study Area as defined in Section 8.6 of the Scoping Report and that the baseline data gathered for the assessment is appropriate. This view is supported by NatureScot. Scope In line with the representation from NatureScot, the Scottish Ministers broadly agree with the impacts to be scoped in and out as summarised in Table 8.8 of the Scoping Report. The Scottish Ministers highlight the representation made by Scottish Fishermen's Federation (SFF) relating to impacts to benthic invertebrates from thermal emissions, disturbance from noise and vibration on fish and shellfish, and foundation works and advise that consideration is given to these points in the EIAR. Mitigation The Scottish Ministers highlight the representation from NatureScot regarding the proposed approach to mitigation and request that consideration is given to ensuring a target cable burial depth of at least 1m to mitigate the effects of electromagnetic fields on benthic ecology receptors. In addition, the Scottish Ministers direct the Developer to the representation from Argyll and Bute Council with regards to cable burial depth for consideration.	The WDA boundary has reduced since scoping and a refined (smaller) zone of influence has been defined for the Benthic Ecology Study Area based on the tidal excursion ellipse: Approximately 4 to 7 km in the North and centre of the WDA; and Between 7 to 11 km towards the South of the WDA. The impact of thermal emissions on benthic ecology has been assessed, with disturbance from noise and vibration on fish and shellfish being assessed in **Chapter 9 Fish (including Basking Sharks) and Shellfish**. Whilst the minimum target cable burial depth has reduced slightly from Scoping to EIAR to allow for burial in challenging ground conditions such as shallow outcropping rock, the target depth for the vast majority of offshore cables remains 1 m, in line with NatureScot's request. As such this does not result in any new or materially different impacts. Therefore, the Scoping Opinion remains valid.

Receptor	Summary of Relevant Points from Scoping Opinion	Justification of Validity of Scoping Opinion
Fish (including Basking Shark) and Shellfish	Study Area The Scottish Ministers are broadly content with the two proposed Study Areas described in Section 9.6, but highlight the representation made by NatureScot regarding maximum tidal excursion for consideration below: Two Study Areas have been defined for Fish and Shellfish ecology – the International Council for the Exploration of the Sea (ICES) rectangles 40E3 and 41E3 that overlap with the WDA and the Regional Study Area, bounded by ICES rectangles 45E2, 45E4, 39E2 and 39E4. The latter provides a wider context for the fish species and populations, used to inform impact assessments over long distances (e.g. underwater noise). In our advice issued following the Scoping Workshop, we indicated that we are content with the Study Areas proposed. The maximum tidal excursion should also be considered to take account of impacts from suspended sediments and ensure that the local Study Area covers the full extent of this potential impact.	The WDA boundary has reduced since scoping and a refined (smaller) zone of influence for suspended sediment concentrations based on the tidal ellipse has been defined. The Regional Study Area has since been updated to include ICES rectangles 41E1 and 40E1 following the results shown in **Appendix 10.1 Underwater Noise Modelling Report** of the EIAR, which identified an 88 km zone of influence based on Popper et al., 2014. However, no new or materially different impacts result from this. Therefore, the Scoping Opinion remains valid.
Marine Mammals and Leatherback Turtle	Scope The Scottish Ministers generally agree with the impacts to be scoped in and out as outlined in Table 10.7 of the Scoping Report. However, the Scottish Ministers advise, in line with the NatureScot representation, that geophysical surveys should be scoped into the assessment. In addition, the Scottish Ministers direct the Developer to the NatureScot representation regarding the scoping in/out of auditory injury from operational noise based on results of underwater noise modelling. Finally, the Scottish Ministers highlight the representation from Argyll and Bute Council with regards to cable burial depth for consideration.	Potential impacts resulting from geophysical surveys and operational noise on marine mammals have been assessed. Whilst the minimum target cable burial depth has reduced slightly from Scoping to EIAR to allow for burial in challenging ground conditions such as shallow outcropping rock, the target depth for the vast majority of offshore cables remains 1 m. As such this does not result in any new or materially different impacts. Therefore, the Scoping Opinion remains valid.
Offshore Ornithology	Baseline Data With regards to the baseline information described in Section 11.4 and Section 11.5 of the Scoping Report, the Scottish Ministers are broadly content with the proposed data sources proposed but highlight the additional data sources recommended by NatureScot and advise that these are included in the EIA Report. The Scottish	The minimum air gap has been increased from 22.45 m to 28.4 m above Highest Astronomical Tide (HAT) to reduce collision risk effects on offshore ornithology receptors whilst accounting for metocean conditions at the WDA, thus reducing the potential effects discussed within the Scoping Opinion.

Receptor	Summary of Relevant Points from Scoping Opinion	Justification of Validity of Scoping Opinion
	Ministers direct the Developer to the representation from NatureScot and RSPB Scotland with regards to DAS which highlights the possible presence of cryptic species and nocturnally active species (e.g. shearwaters and petrels), which may not be recorded effectively using standard survey methods. In addition, the Scottish Ministers advise, in line with NatureScot representation, that any gaps in DAS data should be filled prior to any assessments being undertaken. Finally, the Scottish Ministers direct the Developer to NatureScot Scientific Advisory Committee, Offshore Wind Ornithological Impact Assessment - Review of Digital Aerial Survey Methods in this regard, as highlighted in the RSPB Scotland representation, for consideration. Scope The Developer presents the impacts proposed to be scoped in and out of the assessment in Section 11.9 and Table 11.6 of the Scoping Report. The Scottish Ministers are generally content with the impacts proposed, however agree with NatureScot that disturbance and displacement from vessel movements, light attraction and disorientation and Unexploded Ordnance (UXO) clearance must be scoped into the assessment. This view is supported by RSPB Scotland.	The potential for artificial light impacts on Manx shearwater and European storm-petrel is considered in **Chapter 11 Offshore Ornithology** of the EIAR. This summarises recent information collated by Furness et al. (2026) and is also presented in the RIAA which considers underestimations of these species using DAS methods. During pre-application consultation dated 07 August 2025, the Applicant and NatureScot reached agreement on how identified DAS data gaps should be filled, see Section 11.3 of **Chapter 11 Offshore Ornithology** of the EIAR for further information. Impacts associated with vessel movements during the Project's phases (including movements between ports and the WDA) have been assessed in phase in **Chapter 11 Offshore Ornithology** of the EIAR. UXO clearance has been considered as part of the overall risks of disturbance to seabirds during the construction phase in **Chapter 11 Offshore Ornithology** of the EIAR. Therefore, the Scoping Opinion remains valid.
Commercial Fisheries	Scope Table 12.5 of the Scoping Report summarises the impacts proposed to be scoped in and out of the EIAR for commercial fisheries. The Scottish Ministers are broadly in agreement with the impacts to be scoped out and in, however, in line with MD-SEDD commercial fisheries advice, advise that sprat fishery is included as a receptor in the commercial fisheries assessment. This view is supported by SFF. Additionally, for the avoidance of doubt the Scottish Ministers advise that "physical presence of infrastructure and potential exposure of that infrastructure leading to gear snagging" must be scoped in for all phases of the Proposed Development. The Scottish Ministers also draw attention to the representation made by SFF regarding human casualties and gear snagging and request that this is fully considered in the EIAR. In addition, the Scottish Ministers highlight the SFF representation relating to boulder and UXO clearance for consideration.	The potential impacts on pelagic sprat and herring fisheries have been assessed accordingly. The "physical presence of infrastructure and potential exposure of that infrastructure leading to gear snagging" is scoped in for all phases and assessed within **Chapter 12 Commercial Fisheries** of the EIAR, with cross-reference to navigation safety. Boulder and UXO clearance activities are considered as part of the construction-phase assessment, including potential interactions with fisheries. Whilst the minimum target cable burial depth has reduced slightly from Scoping to EIAR to allow for burial in challenging ground conditions such as shallow outcropping rock, the target depth for the vast majority of offshore cables remains 1 m.

Receptor	Summary of Relevant Points from Scoping Opinion	Justification of Validity of Scoping Opinion
	The Scottish Ministers direct the Developer to the SFF representation regarding design aspects of the Proposed Development, including WTG foundations, IACs, cable burial and protection, scour protection and decommissioning. The Scottish Ministers advise that these must be considered by the Developer when finalising the design parameters for the Proposed Development.	Therefore, the Scoping Opinion remains valid.
Shipping and Navigation	Scope Each of the possible impacts on navigational issues outlined in the Maritime Coastguard Agency (MCA) representation should be addressed within the EIA.	All possible impacts noted by the MCA within their Scoping Opinion have been assessed within **Chapter 13 Shipping and Navigation** of the EIAR. Therefore, the Scoping Opinion remains valid.
Offshore Archaeology and Cultural Heritage	Baseline Data The Scottish Ministers are broadly content with the Study Area as defined in the Scoping Report, however, highlight the representation from Historic Environment Scotland (HES) with regards to the assessment of the Proposed Development on the setting of historic environment assets, using detailed zone of theoretical visibility and appropriate visualisations, and request that this must be fully addressed and implemented in the EIAR. Scope The Scottish Ministers are broadly content with the impact pathways scoped into the EIA, however, highlight the advice from HES regarding the potential impact on scheduled monuments due to the Proposed Development and request that this be fully addressed and implemented in the EIAR. In addition, the Scottish Ministers request that an assessment of the setting of Dubh Artach lighthouse and how it would be impacted, due to the Proposed Development, is undertaken and addressed in the EIAR. This view is supported by NatureScot and NLB.	Detailed Zones of Theoretical Visibility and visualisations have been produced to support the assessment and are presented across **Chapter 14 Offshore Archaeology** of the EIAR and **Appendix 14.3 Settings Assessment**. Impacts on the setting of historic environment assets (including scheduled monuments and Dubh Artach lighthouse) have been assessed in the EIAR. Therefore, the Scoping Opinion remains valid.
Military and Civil Aviation	Scope In Table 15.4 of the Scoping Report the Developer summarises the potential impacts to Military and Civil Aviation during the different phases of the Proposed Development. The Scottish Ministers largely agree with the impacts scoped in to and out of the EIAR however highlight the MoD representation in relation to military low flying training, defence maritime training and operational interests for consideration.	Potential impacts on MoD interests within the Military and Civil Aviation study area have been assessed in **Chapter 15 Military and Civil Aviation** of the EIAR. Potential impacts on Islay Airport and Tiree Airport IFPs are assessed in **Chapter 15 Military and Civil Aviation** of the EIAR. Consultation between the Applicant and HIAL regarding potential

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	The Scottish Ministers highlight the Highlands and Islands Airport Ltd (HIAL) representation stating that the Proposed Development location sits within the Minimum Sector Altitude for Islay and Tiree Airport and may conflict with Instrument Flight Procedures. The Scottish Ministers recommend the Developer engage further with HIAL on these points and advise that these impacts must be assessed, and appropriate mitigation proposed, in the EIAR.	mitigation is ongoing and will continue into the post-application phase of the Project. Therefore, the Scoping Opinion remains valid.
Seascape Landscape and Visual Impacts	Scope The Scottish Ministers broadly agreed with the impact pathways proposed to be scoped into and out of the EIAR as set out in Table 16.8 of the Scoping Report. They directed the Applicant to the NatureScot representation regarding commonality between SLQs and advised this is addressed in the EIAR. In addition, the Scottish Ministers directed the Applicant to the representation from the Royal Yachting Association regarding the impact of the Project on the landscape and seascape for cruising sailors.	The relevant Wild Land Qualities of Wild Land Area 05 Jura, Scarba, Lunga and the Garvellachs were drawn upon to inform the assessment of effects on the Special Landscape Qualities of National Scenic Areas as set out in **Appendix 16.2 Assessment of Effects on Special Landscape Qualities**. Effects on the visual amenity of cruising sailors are considered in **Chapter 16 Seascape Landscape and Visual Impacts** of the EIAR. Therefore, the Scoping Opinion remains valid.
Infrastructure and Other Users	Baseline Data Baseline data sources are considered in Section 17.4 and Section 17.5 of the Scoping Report. The Scottish Ministers consider the baseline data gathered for the assessment is appropriate. Stakeholder engagement The Scottish Ministers emphasise the importance of engaging with other marine users, including developers of ScotWind and INTOG projects, during all phases of the Proposed Development.	The Applicant has consulted with other marine users (including other ScotWind and INTOG developers) within and in the vicinity of the Project. Details of this consultation is provided in **Chapter 17 Infrastructure and Other Users** and **Chapter 6 Consultation and Stakeholder Engagement** of the EIAR Therefore, the Scoping Opinion remains valid.
Socio-economics	Study Area The Scottish Ministers are broadly content with the study areas as detailed in Section 18.6 of the Scoping Report however, in line with the MD-SEDD Socioeconomics advice received on 21 November 2024, requests the Developer to consider expanding the areas of impact to include a “communities of practice” approach	A broad range of impacts on different groups has been considered as part of the EIA, including fisheries, commercial shipping and infrastructure and other marine users. A detailed quantitative and qualitative methodology as well as an analysis was included as part of MachairWind Development

Receptor	Summary of Relevant Points from Scoping Opinion	Justification of Validity of Scoping Opinion
	alongside the "communities of place" approach listed. In addition, the Scottish Ministers encourage the Developer to include the results of the qualitive research included within Appendix K at application stage. Approach to Assessment In Table 18.5 of the Scoping Report the Developer summarises the potential impacts to Offshore Socio-Economics during the different phases of the Proposed Development. The Scottish Ministers broadly agree with the impacts scoped in and out however, advise that cumulative impacts during the decommissioning phase must be scoped in and fully assessed in the EIA Report. This is in line with the MD-SEDD socioeconomics advice. In relation to mitigation measures, the Scottish Ministers highlight the representation from Argyll and Bute Council, with regards to the location of the base of operations, and request that this is considered in the EIA Report.	Economic and Social Scenarios: Opportunities and Impacts (BiGGAR Economics, 2024). Cumulative economic effects, including on decommissioning, have been assessed in **Chapter 18 Socio-economics** of the EIAR. Consideration of the Projects shortlisted port local areas is detailed in **Chapter 18 Socio-economics** of the EIAR. Therefore, the Scoping Opinion remains valid.
Greenhouse Gas Assessment	Approach to assessment The Scottish Ministers are largely content with the Developer's approach in assessing Green House Gases ("GHG") and climate change effects within Section 19 of the Scoping Report, noting that the IEMA EIA Guide "Assessing Greenhouse Gas Emissions And Evaluating Their Significance" provides further insight on this matter. The Scottish Ministers have considered this together with the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and the requirement of the EIA Regulations to assess significant effects from the Proposed Development on climate. The Scottish Ministers highlight that the GHG assessment should include the pre-construction, construction, operation and decommissioning phases, including consideration of the supply chain as well as benefits beyond the life cycle of the Proposed Development. The NatureScot representation regarding climate change and carbon costs should be fully addressed by the Developer within the EIA Report. Blue carbon The Scottish Ministers direct the Developer to the NatureScot representation in relation to blue carbon assessment. The Scottish Ministers advise that consideration should be given to impacts on blue carbon as a result of the Proposed Development	The greenhouse gas assessment presents a calculation of GHG emissions arising from the construction (including pre-construction activities), operation and decommissioning phases of the Project. Upstream emissions from the supply chain, particularly from activities which encompass 'embodied' carbon in materials, have been accounted for in the assessment. The benefits of the Project, in terms of avoided emissions from other forms of electricity generation, have also been calculated. The Blue Carbon assessment presented in **Appendix 19.2 Blue Carbon Assessment** considers potential impacts on blue carbon habitats and sediments from activities within the WDA. Therefore, the Scoping Opinion remains valid.

Receptor	Summary of Relevant Points from Scoping Opinion	Justification of Validity of Scoping Opinion
	as well as an expanded assessment for benthic ecology focusing on potential impacts on marine sediments and coastal habitats.	
Climate Change Risk Assessment	The Scottish Minister's advice on climate change follows that described for the Greenhouse Gas Assessment detailed above.	See above row regarding the Greenhouse Gas Assessment. The Scoping Opinion remains valid.
Major Accidents and Disasters	The Scottish ministers requested that the description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and the Proposed Development potential to cause an accident or disaster.	The EIA considers the vulnerability of the project to a potential major accident or disaster or to cause an accident or disaster. Therefore, the Scoping Opinion remains valid.

4 SUMMARY

54. The definition of WDA parameters in the Scoping Report was indicative. Since scoping, the PDE has been refined based on review of site investigation data, engineering and environmental workshops and engagement with suppliers, stakeholders and communities. It is not feasible to define detailed design parameters at this stage of the application process due to the early stages of development of the Project. Therefore, a Rochdale Envelope approach has been adopted for the WDA EIAR. The approach is implemented in accordance with current good practice, as described in Marine Scotland Consenting and Licensing Guidance for Offshore Wind, Wave and Tidal Energy Applications (2018) and related guidance outlined by Marine Scotland[3] and the Energy Consents Unit (Marine Scotland, 2022). The main requirements of the Marine Scotland (2022) guidance are to develop an "informed and credible" design envelope and to justify the parameters selected in relation to likely environmental effects.

55. **Section 3** confirms that the changes in the design envelope from scoping to the WDA EIAR do not alter impacts scoped in/out for topic receptors.

56. In conclusion, this WDA Scoping Validation Report concludes that the Scoping Opinion issued by MD-LOT in January 2025 remains valid for the Project and no additional requirements for the WDA EIAR have been identified and are considered necessary.

[3] Now referred to as the Marine Directorate

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